

MODELWISE

Protection of personal data

This document explains how ModelWise processes the personal data of website visitors, prospects and customers during non-binding inquiries, communication and execution of the order.

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Operator Sappun s. r. o.

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1 Operator and contact

The operator of personal data is Sappun s. r. o., which operates the ModelWise brand. Questions and requests regarding personal data can be sent to info@modelwise.sk or to the address of the headquarters. The operator does not have

designated responsible person, unless such an obligation arises.

2 Who and what activities the document concerns

The policy applies to visiting modelwise.sk, sending a non-binding inquiry and attachments, e-mail or telephone communication, preparation of the offer, conclusion and fulfillment of the order, invoicing, transport, complaints and internal record of inquiries and orders.

The affected person can be a customer, an interested party, a contact person of a customer or supplier, or a person

stated in the documents that the customer has rightfully provided to us.

3 Categories of personal data

- identification data, especially the name, surname, trade name and job position of the contact person
- contact information, especially e-mail, telephone, billing and delivery address
- demand and order data, technical specifications, reports, notes, approvals, deadlines and project status
- files and attachments, for example photos, sketches, CAD data, production documents and documentation
- contractual, invoicing and payment data to the extent necessary for billing
- web and communication technical data, such as IP address, request time, device type and system logs
- data on complaints, requests and exercise of the rights of the person concerned

We ask customers not to send personal data that is not necessary for the technical documents assessment or fulfillment of the order.

4 Purposes, Legal Basis and Retention

Purpose Data Legal basis and period

Steps before concluding the contract according to Art. 6 par. 1 letter b)

Contacts, administration, technical documents and

GDPR demand and supply. Unsuccessful request usually 24 months from the last one communication

communication.

Assignment, documents, approvals,

Fulfillment of the contract according to Art. 6 par. 1 letter b) GDPR. During

Order and internal records communication, status of the order and the order and, as a rule, 4 years after its end, if longer

delivery is not required by dispute or law.

Legal obligation according to Art. 6 par. 1 letter c) GDPR.

Identification, invoicing, payment and

Invoicing and accounting Accounting records of 10 years following the year of which delivery data

they concern

Legal obligation and legitimate interest according to Art. 6 par. 1

Order, communication, evidence and result

Complaints and legal claims letter c) and f) GDPR. For the duration of the proceedings and relevant equipment

limitation periods.

Steps before the conclusion of the contract or performance

contract according to Art. 6 par. 1 letter b) GDPR.

Photos, sketches, CAD data and

Request Attachments Standard 180 days from upload; longer only if other recorded materials

the basis becomes part of the contract or is

necessary for a legal claim.

Legitimate interest to protect the website, form and data

IP address, time, device, system and according to Art. 6 par. 1 letter f) GDPR. As a rule

Web and IT security

error logs for a maximum of 12 months, longer in case of investigation incident.

Consent according to Art. 6 par. 1 letter a) GDPR, if marketing

Marketing E-mail and a record of consent will be introduced. Until withdrawal of consent or maximum 3 years from

last activity.

The indicated times are the maximum common times. We may delete the data sooner if it is no longer needed. If a dispute arises,

inspection or security incident, we keep the necessary data until its legal end.

5 How the registration of inquiries and orders works

Data from the web form is submitted to Google Forms and automatically written to a linked Google spreadsheet Sheets, which ModelWise uses as an internal record of inquiries and orders. For a new query, ModelWise gets it email notification.

1. Attachments are uploaded to the web storage before submitting the form. A link to is stored in the internal records

file so that a ModelWise authorized person can open it when equipping the query. Attachments by default they keep for 180 days.

2. Further communication, offers, approvals and changes to the assignment take place by e-mail, telephone or in person.

The customer does not have a user account or access to internal records.

3. Internal records are not used for automated decision-making with legal or similar significance effects or on profiling.

6 Sources of personal data

We obtain the data directly from the person concerned, from his employer or represented organization, z communications and documents created during the order and from the technical records of the website and the inquiry form.

If the customer provides us with the data of another person, he is responsible for the fact that he can provide it and that the person in question adequately informed.

7 Beneficiaries and intermediaries

We make data available only to the extent necessary to authorized persons and suppliers who ensure:

- web operation and attachment storage through OpenAI's ChatGPT Sites service
- collection of form responses, internal records and e-mail notifications via Google services Forms, Google Sheets and Gmail
- accounting, invoicing, legal and tax services
- production or professional subcontracting, if they are necessary to fulfill the order
- payments, shipping and delivery
- public authorities, if provision is required by law or valid decision

We enter into processing contracts with suppliers who process personal data on our behalf and require adequate security and confidentiality.

8 Transfers outside the European Economic Area

Some cloud and communication service providers may involve infrastructure or subcontractors outside the European Economic Area. If such a transfer occurs, we will use the permitted mechanism GDPR, in particular the Adequacy Decision or Standard Contractual Clauses, and supplementary as necessary security measures. Information about the mechanism used will be provided by ModelWise upon request.

9 Obligation to provide data

We need to know the data marked as necessary for an inquiry or order in order to prepare an offer, enter into and fulfill a contract or fulfill a legal obligation. Without them, we may not be able to assess the

demand or

execute the order. Marketing consent is voluntary and its refusal does not affect the processing of the order.

10 Rights of the data subject

Under the terms of the GDPR, the data subject has the right to:

- obtain confirmation as to whether we are processing her data and request access to it
- request the correction of inaccurate or incomplete data
- request erasure or restriction of processing, if the legal conditions are met
- to obtain data in a portable format during processing based on consent or a contract being executed

automated

- object to processing based on legitimate interest, including direct marketing
- withdraw consent at any time without affecting the legality of earlier processing
- submit a proposal or complaint to the Personal Data Protection Office of the Slovak Republic

The request can be sent to info@modelwise.sk. We can reasonably verify the applicant's identity before furnishing.

We will respond to the request within the deadline according to the GDPR.

11 Cookies and web technologies

The website may use essential technical cookies or similar storage necessary for security, basic settings and operation of the inquiry form. Consent is not required for these technologies if they are necessary.

If ModelWise implements analytical or marketing cookies, they are activated only according to the visitor's choice and policy

shall be supplemented with their provider, purpose and period of validity. Refusal of optional cookies must not prevent use

basic web functions.

12 Security

ModelWise uses appropriate technical and organizational measures, in particular access control, strong login to the services used, encrypted transmission, updates, registration of security events and rules for authorized persons. Access to internal records and links to attachments is limited to those who need it to fulfill an inquiry or order.

13 Policy Changes

The current version is always available at modelwise.sk. In the event of a substantial change in processing, we inform the affected parties

persons in an appropriate manner. If the new purpose is based on consent, we will not use the data for it without a valid reason

consent.

14 Legal framework

Processing is mainly governed by Regulation (EU) 2016/679 of the European Parliament and of the Council GDPR and Act No.

18/2018 Coll. on the protection of personal data. The keeping of accounting records is governed by Act no.

431/2002 Coll.
about accounting.