

Privacy Policy

Welcome to the website of Sudo labs! We value your privacy. The purpose of this Privacy Policy (the “Privacy Policy”) is to inform you of our practices regarding the collection and use of your information that you share with us through our website <https://sudolabs.com> (the “Website”). Please read this Privacy Policy carefully!

- (A) This Privacy Policy was last modified on 21.1.2022. From time to time, we will change the Privacy Policy (especially with respect to changes in legislation). However, we will keep you informed of any substantial changes to the Privacy Policy. The current version can always be found on our Website.
- (B) We process your personal data with due care in accordance with all relevant legislation, including REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the “GDPR”).
- (C) The Privacy Policy applies exclusively to the processing of personal data by us. This Privacy Policy does not address the privacy practices of other third parties and we are not responsible for them.
- (D) We do not knowingly process or ask for information from persons under the age of 18. We will delete data that we become aware was provided by a person under the age of 18 without the consent of a parent or legal representative.

1. Who processes your personal data?

- 1.1. Your personal data is processed by our company Sudo Labs s. r. o., with its registered office at Námestie osloboditeľov 3/A, 040 01 Košice - mestská časť Staré Mesto, Slovak Republic, IČO: 50415719, registered in the Commercial Register of the District Court Košice I, Section: Sro, File No.: 39525/V (the “Controller”, “we”, “us” or “our”).
- 1.2. If you would like to learn more about the processing and protection of your personal data or if you have any further questions, you can contact us at gdpr@sudolabs.io.



2. What personal data do we process?

We may collect the following types of information about you:

2.1. Personal Data

Through the Website, we may collect and process your contact details such as first and last name, email address, telephone number, address, or other data within the scope of the CV provided or other data uploaded and created by you that meet the character of personal data.).

2.2. Technical Data

We and/or our external service providers (e.g. hosting providers as well as service providers as Hotjar, Google Analytics, Facebook Analytics, Facebook Pixel) may collect technical data when you visit or interact with our Website. The technical data may include, in particular, the URL of the website you visited before visiting our Website, the time and date of users' visits, browsing habits, IP address, browser name, type of computer or device through which you access the Website, time spent on Website and other similar technical information. In a limited number of cases, it is possible to use technical data and identify you as an individual, making it personal data in accordance with applicable law, but we never use technical data to identify you as an individual.

2.3. Cookies

2.3.1. What are cookies?

- (a) A cookie is a small text file that the Website stores on your device when you visit it. Session-based cookies are stored only when the browser is open and are automatically deleted when the browser is closed. Permanent cookies last until you or your browser delete them or until they expire. They help with the basic functions of the Website. Permanent cookies last until you or your browser delete them or until they expire. They make it easier to set up the Website when you return, they help you to log in or remind you of the Website's options in the ad slots of other sites.
- (b) In order for our Website to function properly, we sometimes store small data files called cookies or other similar technologies on your device. You can read more details about the processing of cookies on our Website in the Cookies Policy.



2.3.2. What cookies do we use?

- (a) We use our own functional cookies (Google Tag Manager), which are necessary for the functioning of the Website, help it work better and provide users with a better experience.
- (b) We use permanent third-party analytics cookies (such as Google Analytics, Hotjar, Facebook Pixel), which allow us, for example, to recognize and count users, and see how they behave when using our Website so that we can improve its functionality in order to make users more satisfied.
- (c) We may also use permanent third-party marketing cookies, specifically Facebook Pixel, Hotjar, Facebook Analytics and Google Analytics, which allow you to uniquely identify your browser and Internet device, allowing our service providers to identify what interests you and show you targeted content. These cookies also allow some companies to target you on other sites.

2.3.3. How to set cookies?

- (a) When you visit the Website for the first time, we inform you about the use of cookies, and possibly also request your consent to the use of cookies. Cookies will not be used for any purposes other than those specified above.
- (b) As mentioned above, in some cases we may use cookies from third parties (service providers). A list of such third parties that you will encounter when using our Website is listed below in Section 4 of this Privacy Policy. We are not responsible for third-party websites and their privacy policies. Those companies collect and process this information based on their privacy policies.

3. What are the purposes and legal bases for the processing of your personal data?

We process your personal data for the purposes of:

3.1. Creating and maintaining an internal database of candidates

We process your data in order to manage the internal database of candidates for job positions within our company.



For this purpose, we process the following personal data that you have voluntarily provided to us: your name, surname, address or other contact data, data from social networks, data within the scope of the provided CV and other data that you have provided to us for this purpose.

Legal basis for such processing: consent in accordance with Art. 6 par. 1 letter a) GDPR.

3.2. Customer administration, creation and fulfillment of the contract that exists between us as a result of your decision to use our services that we offer through the Website

We process your data so that we can provide you our services, which may include the processing of personal data, which is necessary e.g. for the following activities:

- creation and execution of your order and subsequent sending of information to you regarding its status via email,
- handling your possible inquiries in relation to the service ordered via email,
- customer records (including persons authorized to act on their behalf),
- informing you of changes in this Privacy Policy and in our General Terms and Conditions.

For this purpose, we process the following personal data that you have voluntarily provided to us: your name, surname, e-mail address, telephone number, address and other data or uploaded data that you voluntarily provide us with when using our Website or via e-mail.

Legal basis for such processing: performance of the contract in accordance with Art. 6 par. 1 letter b) GDPR.

3.3. Direct marketing and customer relationship development

We process your data so that we can develop existing relationships with our customers. This purpose includes in particular communication with the customer and the development of customer relations.

For this purpose, we process the following personal data that you have voluntarily provided to us: your name, surname, e-mail address and other data or uploaded data that you voluntarily provide us with when using our Website or via e-mail.

Legal basis for such processing: legitimate interest in accordance with Art. 6 par. 1 letter f) GDPR.



3.4. Resolving disputes, complaints and other customer complaints

We process your data in order to resolve disputes, complaints and other complaints.

For this purpose, we process the following personal data that you have voluntarily provided to us: your name, surname, address or other contact details, as well as the circumstances of the case.

Legal basis for such processing: fulfillment of a legal obligation in accordance with Art. 6 par. 1 letter c) GDPR.

3.5. Enforcing compliance with our terms and conditions

We process your data in order to enforce our terms and conditions.

For this purpose, we process the following personal data that you have voluntarily provided to us: your name, surname, e-mail, address or other contact information.

Legal basis for such processing: legitimate interest in accordance with Art. 6 par. 1 letter f) GDPR.

3.6. Compliance with tax, accounting and other legal regulations

We process your data in order to comply with legal obligations (for example, tax and accounting legislation related to financial performance).

For this purpose, we process the following personal data that you have voluntarily provided to us: your name, surname, address or other contact details.

Legal basis for such processing: fulfillment of a legal obligation in accordance with Art. 6 par. 1 letter c) GDPR.

3.7. Candidates for jobs or other cooperation

We process data of candidates for job positions or other forms of cooperation with us for the purpose of their assessment and communication regarding such opportunities.

For this purpose, we process the following personal data that you have voluntarily provided to us: your name, surname, address, phone number, email, work experience and any other information in the CV provided to us.

Legal basis for such processing: consent in accordance with Art. 6 par. 1 letter a) GDPR.



4. Who are the recipients of your personal data?

We do not share your personal data with any recipient outside the Controller's organization, unless one of the following circumstances occurs:

4.1. Sharing is essential for fulfilling our services

If our external collaborators (subcontractors) need access to your personal data in order to assist us in providing services, we take appropriate technical, contractual and organizational measures to ensure that your personal data are processed in accordance with the legal regulations.

There is a list of our subcontractors below:

- Companies in charge of managing the tax accounting agenda, auditors, lawyers and other professional advisers.
- Operators of support processes for automated processing of personal data (server, cloud, payment gateway, other specific software, etc.).
- External contractors who help us provide you with services where it is necessary to gain access to your personal information.
- Website analytics tool operators (e.g. Facebook Ireland Ltd. (Facebook Pixel and Facebook Analytics), Google LLC (Google Analytics) or Hotjar Limited (Hotjar).

4.2. Sharing is necessary for other legal reasons

We may share your personal data with other recipients if we believe in good faith that access to and use of your personal data is reasonably necessary to: (i) comply with applicable law, regulation, and/or court order, (ii) detect or prevent fraud, security or technical issues, (iii) to protect our interests, property or safety of the Controller, our users or the public as far as in accordance with the law. If possible, we will notify you of any such sharing.

5. Is automated individual decision-making and profiling used?

We do not use profiling or automated individual decision-making in the processing of your personal data, and any decision we make with regard to the provision of services for you is controlled and managed by an authorized person.

6. Do we transfer your personal data to countries outside the EU / EEA?

No, the Controller does not primarily transfer your personal data outside the countries of the European Union and the European Economic Area (EEA). If, as an Controller, we cooperate with an external service provides (processor) located outside the EEA (and



thus a cross-border transfer of personal data occurs), we may transfer your personal data only to countries that are considered to have an adequate level of protection of personal data in accordance with a decision of the European Commission, or in which appropriate safeguards are in place to protect your personal data (e.g. standard contractual clauses or binding company internal rules). However, regardless of the country in which your personal data is processed, we take appropriate technical and organizational measures to ensure that the level of protection is the same as in the European Union and the EEA.

7. What are your rights?

7.1. Right of access

We offer you access to your personal data that we process. This means that you can contact us and ask us to confirm whether your personal data are being processed or not, and if so, you have the right to request access to your data which we will provide you with in the form of the so-called “register” (in particular, the purpose, the category of personal data, the category of recipients of personal data, the retention period or the criteria for determining the retention period).

7.2. Right to correct

You have the right to correct the incorrect personal data concerning you.

7.3. Right of deletion

You may also ask us to delete your personal data from our systems. We will accept such requests unless we have the legal authority not to delete your personal data.

7.4. Right to restrict processing

You may ask us to restrict certain processing of your personal data. Restricting certain processing of your personal data may lead to restrictions on the use of our Website.

7.5. Right to data transfer

You have the right to receive your personal data in a structured, commonly used and machine-readable format for the purpose of transferring personal data to another controller.



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8.6. How to exercise your rights

You can exercise your rights mentioned above free of charge, in writing by sending an e-mail to gdpr@sudolabs.io. We may require confirmation of your identity depending on your request.

9. Can I complain?

If you believe that the processing of your personal data is not in accordance with the relevant data protection legislation, you may file a complaint to the relevant data protection authority (Office for Personal Data Protection of the Slovak Republic).

9. Are your personal data safe?

Yes. We take all necessary security (technical and organizational) measures to protect us and you from unauthorized access or unauthorized alteration, disclosure or destruction of the personal data we process. Measures include encryption, firewalls, secure devices and access rights systems, regular training of our employees and confidentiality agreement with our partners. Should security breaches occur despite your security measures that are likely to adversely affect your privacy, we will notify you as soon as possible. If you have any questions, feel free to contact us at gdpr@sudolabs.io.

