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PRIVACY POLICY

This Privacy Policy applies to all trust, information, cryptographic and other services provided by brainit.sk s.r.o.

Please read this document carefully, which describes in detail the Privacy Policy that applies to trust, information, cryptographic and other services provided by brainit.sk s.r.o.

This Privacy Policy forms an integral part of the General Terms and Conditions of the contract of trust, information, cryptographic and other services of brainit.sk s.r.o. (General Terms and Conditions). The Privacy Policy is available on the brainit.sk website (<https://nfqes.sk>)

This Privacy Policy applies to the activities carried out by brainit.sk in the provision of services under the General Terms and Conditions. In addition, in connection with some of its services, brainit.sk may provide and implement specific privacy policies regarding the processing of personal data by brainit.sk in the provision of those services. In the event of a conflict between this Privacy Policy and such specific policies, the specific policies shall prevail, but only with respect to the processing activities related to the provision of the relevant services to which such policies relate. In the event of gaps in the Specific Principles, the provisions of this Privacy Policy shall apply.

1. WHO WE ARE AND HOW WE PROCESS PERSONAL DATA

In providing its trust, information, cryptographic and other services

Company:

Name: brainit.sk, s.r.o.

Headquarters: Veľký diel 3323, 010 08 Žilina

ID: 52577465

VAT NUMBER: 2121068763

VAT ID: SK 2121068763

Website: <https://nfqes.com>

Contact details:

info@brainit.sk


+421 907 679 106

Contact person responsible:

gdpr@brainit.sk

Processes personal data in accordance with this Privacy Policy. In addition, in connection with its individual services, brainit.sk may establish and apply specific privacy policies regarding the processing of personal data by brainit.sk in the provision of its individual services. In the event of any conflict between this Policy and such specific policies, the specific policies shall prevail, but only with respect to the processing activities related to the provision of the relevant services to which this Policy applies. If there are no gaps in the Specific Policies, the provisions of this Policy shall apply.

When processing personal data, brainit.sk complies with all applicable data protection regulations that apply to its activities, including but not limited to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of

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personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as "the Regulation").

Personal data is any information associated with an identified or identifiable natural person, such as name, PIN, online identifier, address, telephone number, email address, etc., within the meaning of the Regulation.

Processing of personal data means any act or set of acts which may be performed automatically or by other means in relation to personal data.

All terms and definitions used in this Policy for which no definition is provided herein shall have the meanings given to them in the General Terms and Conditions or in the applicable brainit.sk policies and procedures; or, if not defined in the foregoing documents, shall have the meanings given to them in the Regulation and other applicable laws and regulations.

2. FOR WHICH INDIVIDUALS WE PROCESS PERSONAL DATA

In connection with brainit.sk's activities as a provider of qualified and trusted services, we process information about:

- Customers brainit.sk - natural persons;
- Natural persons who are representatives of brainit.sk customers and natural persons designated by legal entities - brainit.sk customers as contact persons;
- Individuals who have submitted enquiries (including by telephone), requests, notifications, complaints or other correspondence to brainit.sk;
- Individuals whose information is contained in inquiries (including telephone calls), requests, notices, complaints or other correspondence addressed to brainit.sk (collectively referred to as "Data Subject" / "Data Subject" / "You").


3. WHAT CATEGORIES OF PERSONAL DATA DO WE PROCESS?

3.1. Data processed in connection with the identification of the user for the purpose of requesting brainit.sk services and concluding a contract

3.1.1. Data processed when enquiring about services and when concluding a contract in person

Some of brainit.sk's services can be requested in person at a branch of the provider or at a branch of the registration authority. In such cases, we may process the following data:

- User ID: Full name (according to the identity document); details from the identity document (national identification number depending on the issuing country of the identity document, number, date of issue, date of validity and issuer of the identity document, date of birth; address); data obtained in the course of the official validation of your identity document from official databases of the competent authorities in the country of issue of the identity document (if access to such databases is available in the jurisdiction of the country of issue of the identity document) and/or data obtained from the machine-readable part or from the NFC chip of the identity document (this may include a photograph from the official databases of identity documents); signature;
- Contact details - mobile phone number, email address and postal address;

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- Alternatively, details of the customer you represent and your representative's authorisation (type, term, limitations, amendment, copy of authorisation, details of power of attorney, etc.), position, official contact details (telephone number and e-mail address),
- Alternatively, personal data contained in documents about the legal entity Customer submitted to brainit.sk (e.g. documents certifying the establishment of the legal entity or its current status, etc.) in connection with its identification as a Customer.

3.1.2. Data processed during registration and/or user identification

Some of brainit.sk's services can be used by registering with brainit.sk's mobile applications ("Applications"). In such cases, after registration and/or identification (whether initial or re-identification) through our Application, we process the personal data described in the Privacy Policy that applies to the use of the relevant Application. The Privacy Policy applicable to the use of the relevant Application is available in the Application itself as well as on our website and it is a mandatory requirement to read it when registering for the Application.

In addition to the information listed above in section 3.1.1 and 3.1.2, we may also process the following personal data in connection with the conclusion, modification, performance and termination of the brainit.sk service contract:


- information on the contract: type of contract; date of conclusion; terms and conditions of the contract; information and documents relating to the modification, performance or termination of the contract (notices, date, legal grounds, supporting documentation, etc.); amendments to the contract; other aspects relevant to the validity, conclusion and performance of the contract; notices and other documents and information relating to the contract, including any documents and information relating to acts (legal and factual) performed and representations made in connection with the contract;
- correspondence and other communications related to the contract; information contained in or related to questions, offers, reviews/feedback, complaints, claims, etc.
- other information created or exchanged during the negotiation, conclusion, amendment, performance and termination of contracts.

3.2 Data processed in connection with the issue of qualified electronic signature certificates

When issuing a qualified electronic signature certificate, personal data necessary for identification will be processed for the purpose of requesting brainit.sk services and concluding the contract as described in point 3.1 above.

The content of the issued certificates for qualified electronic signature is in accordance with the valid European standards. The certificate issued by brainit.sk will contain your name or your chosen nickname, country, information about the start and end date of validity, your public key, information about the issuer and data used to identify and verify the certificate by the Parties. In addition, the certificate may also contain information about the legal entity with which you have a legal relationship.

When issuing a qualified certificate for a qualified electronic signature, brainit.sk may, in addition to the above data, also include information about your national identification number, identity document number, VAT number, etc. as information such as date of birth, date of validity of the identity document and other data obtained from the machine-readable part of the identity document and/or

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from the NFC chip of the identity document and/or from the official databases of the competent authorities based in the jurisdiction of the country issuing your identity document. What data is included in brainit.sk's user credentials will depend on what data you want brainit.sk to certify to the Affiliates before whom you will be using such certificates.

Each qualified trust service provider is obliged under the applicable legislation to maintain a certificate repository of qualified certificates issued by it for qualified electronic signature, as well as of all suspended and terminated certificates. This shall be done in order to allow all relying parties to verify the validity of the certificates. Brainit.sk maintains functionality to verify the validity of certificates issued by it.

3.3 Data processed by remote electronic signature/seal

In the case of electronic signing/sealing remotely, brainit.sk stores information in the form of logs on the fact and time of signing and the fact and time of sending and receiving signed documents, together with system identification numbers of the Customer and the Relying Party (sender of the document to be signed / recipient of the signed document).

3.4 Data processed in connection with the issuance of a qualified electronic seal certificate


When issuing a qualified electronic seal certificate, personal data necessary for identification will be processed for the purpose of requesting brainit.sk services and concluding a contract as described in point 3.1 above. The content of the electronic seal certificates issued by brainit.sk complies with the applicable European standards. The certificate issued by brainit.sk shall contain the name and, where applicable, the registration number according to the official registers of the seal creator, the data for validation of the electronic seal corresponding to the data for the creation of the electronic seal, information on the start and expiry dates of validity, information on the issuer and the data used to identify and verify the validity of the certificate by the Related Parties.

3.5 Data processed in connection with the issuance of a qualified certificate of authenticity for websites

When issuing a qualified certificate of authenticity of websites, the personal data according to point 3.1 will be processed for the purpose of identification for the purpose of requesting brainit.sk services and concluding a contract. The content of the qualified certificates of authenticity of websites issued by brainit.sk complies with the applicable European standards. The certificate issued by brainit.sk shall contain the name or nickname (if it is a nickname, it must be clearly stated), the relevant name of the person to whom the certificate has been issued and, if applicable, the registration number according to the official registers of the person to whom the certificate has been issued (if it is a legal entity), details of the address, including at least the city and country of the person, to whom the certificate has been issued, the domain name or domain names maintained by the person to whom the certificate has been issued, details of the start and end date of validity, details of the issuer and details that serve to identify and validate the certificate by the Common Parties.

3.6 Data processed in connection with the creation of a qualified electronic time stamp

The qualified electronic time stamp is based on the presumption of accuracy of the date and time indicated therein and on the integrity of the data submitted to brainit.sk. The data may be an electronic

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signature, an electronic seal, a hash of unsigned electronic documents or a hash of other electronic content. A qualified electronic time stamp can be integrated into the process of creating, sending or receiving electronic signatures/seals, electronically signed documents and electronic transactions, archiving electronic data, etc. This service uses technology to link the date and time to the data in a way that excludes the possibility of any unnoticed change to the data and provides the possibility to prove the fact of signing an electronic document or other electronic object in a subsequent time period (after the expiry of the validity period of the qualified electronic time stamp).

3.7 Data processed in connection with the qualified validation of a qualified electronic signature/seal

When providing the electronic signature/seal verification service, brainit.sk processes the signature/seal verification data contained in the relevant qualified electronic signature/seal certificate, the data representing the electronic signature holder/electronic seal creator and other data contained in the relevant certificate, data additionally provided by the Relying Party using the service, as well as the result of the validation performed.


3.8 Data processed when using the electronic registered delivery service

Every signing of documents via the brainit.sk registered mail application includes a qualified electronic registered delivery service as an integrated service. Further information on the data processed in the provision of this service can be found in the Privacy Policy applicable to the use of the relevant brainit.sk Application available in the Application itself as well as on the Website.

When using the electronic registered delivery service outside of the Applications, brainit.sk stores information about all documents that are sent/received by the user in the form of electronic receipts/evidence of the facts of sending and receiving documents and the integrity of the transmitted content. Such evidence shall include information on the time of sending and receipt of documents, identification data of the sender/receiver. Upon confirmation of sending, receipt and signing of the documents, brainit.sk shall provide the sender with an electronic receipt/proof signed by the sender containing information on the time of sending, receipt and/or signing, information on the sender and the recipient as evidence.

3.9 Data processed in the provision of a qualified electronic signature/seal and/or electronically signed/sealed electronic documents of a qualified storage service

In providing these services, brainit.sk provides long-term storage of all types of electronic signatures and seals contained in documents (with temporary storage of the documents themselves in the repository) and/or electronically signed/sealed documents (with storage) for customers and provides evidence of the storage process with the possibility of long-term verification of electronic signatures/seals. The provision of such services requires the retention of the data contained in the relevant electronic signatures and seals and/or in the stored documents. The data objects, the corresponding storage evidence and the additional information needed to verify them shall be accessible via the service interface or by making a specific request for the provision of data and/or evidence. These may be provided either separately or in an I/O package that is securely protected by encryption. In any case, they shall only be transmitted to the customer or his authorised representative. In addition, brainit.sk stores information about all prepared I/O packages, including the date of the event and the criteria by which the stored objects included in the package were selected. The request must specify the person requesting the data, the reasons for requesting it, and

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the manner in which he or she wishes to receive it, and brainit.sk also stores such information. After the retention period agreed with the Customer, the data will be deleted.

3.10 Data processed when using the electronic identification service

The electronic identification service gives you the opportunity to identify yourself to third parties (e.g. a bank) when entering into a contract, using remote services provided by a dependent party, etc. that identify you (e.g. mobile phone number, email address, etc.) with a request for your identification. You will receive a notice for each Relying Party that wishes to be identified from it. In order to activate the electronic identification service, you must carefully review the personal information requested by you and confirm that you wish to be identified to that Relying Party. As a result, an electronic document will be generated - a declaration containing information about your identity, the confirmation (certification) of which has been requested by the Cooperating Party, and then brainit.sk will issue you with a one-time identifier with the content requested by the Cooperating Party for identification purposes only. Such identifier shall contain all personal data that brainit.sk believes to be up-to-date and verified by legally permissible means under Regulation (EU) 910/2014. The remote identification attribute is a document you sign - a declaration on your own declaration of circumstances on your part and serves only for the purposes of your identification, insofar as the identification attribute binds brainit.sk to responsibility for the validity of the circumstances set out in the responses to this identifier. This document may include your name, birth number, a copy of your identification document and other information for the purposes of the requested service. If you agree to identify yourself to the Relying Party with the information provided in the document, you will sign it using the identifier issued to you for this purpose and authorize brainit.sk to send the document so signed to the Relying Party. As part of the electronic identification service, you will send the document signed by you to the Co-operating Party.


3.11 Data processed when using the electronic authentication service

The e-authentication service allows you to securely identify yourself when accessing your accounts on various websites and third-party online services without entering usernames and passwords, or as a second step in secure two-factor identification. In providing this service, information is processed about the website/service that is being requested, the time it is being requested, and whether you have confirmed or denied through the Application that you are the person who has requested access to the website or service.

When providing this service, brainit.sk generates a document with structured content based on the Customer's authorization, which contains the Customer's personal data in the amount necessary to identify the Customer to a particular Relying Party for the purposes of accessing certain content provided by the latter. . As part of the brainit.sk service, it sends the generated document to the Relying Party without a signature.

3.12 Data processed in connection with payment for services rendered

For the purposes of payment for the services provided and determining the fees payable for the services provided, brainit.sk processes information about the type and volume of services provided, including data about the number of signatures and the time of their provision, as well as information about the Co-Partner in the relationship with which the respective service was used (in cases where the services are paid for by the Co-Partners). In the event that you pay us for the use of the services, we will additionally process the following data concerning you: the VAT number (for individuals with a

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VAT number), information from the commercial register (for individuals in the commercial register) or other national identification number, the method of payment, including the account from which the payment was made, information on payments due and made by you and other data contained in financial and accounting documents in accordance with applicable legislation.

3.13 Information we collect in connection with customer service and other types of communication

We may process the following personal data when providing services to our customers as well as in other types of communication with us:

- email address or phone number depending on the form you have chosen for communication;
- other data contained or provided in your communication with brainit.sk and subsequent correspondence;
- information about the time of receipt/sending of the message as well as information about the status of the messages sent, so that we can respond to or process your enquiry or request.

3.14 Information we collect

brainit.sk keeps records/logs, as specified in the General Terms and Conditions, of all significant events on its systems for a minimum period of 1 year, unless a different period is expressly stated in the General Terms and Conditions, in this Privacy Policy or in any other general terms and conditions applicable to the relevant service, contract or privacy policy.

4. FOR WHAT PURPOSES WE PROCESS YOUR PERSONAL DATA


brainit.sk collects, stores and processes the information referred to in point 3 above for the purposes set out in this Policy and the General Terms and Conditions. Depending on the legal bases for processing, these purposes may be:

- related to brainit.sk's compliance with its legal obligations;
- related to and/or necessary for the performance of contracts concluded between users and brainit.sk, or to take steps at the user's request prior to the conclusion of such a contract;
- related to the legitimate interests of brainit.sk or third parties;
- for which you have consented to the processing of your data.

4.1 Purposes of processing of personal data by brainit.sk related to compliance with legal obligations

All such purposes include:

- compliance with regulatory requirements applicable to the provision of trust services, including ensuring secure identification of users, verification of the authenticity of the data provided, verification of the validity of the identity document, inclusion of the required content in certificates issued by brainit.sk, etc;
- Compliance with regulatory requirements for the retention, disclosure, provision or access to information in connection with brainit.sk's activities as a qualified trust service provider;
- fulfilling brainit.sk's legal obligations to reproduce and prove electronic statements made by users;
- compliance with applicable tax and accounting legislation;

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- other activities related to brainit.sk's compliance with its legal obligations to provide information to relevant governmental and judicial authorities or to assist with inspections by relevant authorities or mandatory inspections related to brainit.sk's regulated activities as a trust service provider.

4.2 Purposes of the processing of personal data by brainit.sk related and/or necessary for the performance of the contract or to carry out steps at the customer's request before the conclusion of the contract

All such purposes include:

- activities related to the identification and/or registration of users/customers;
- service activities;
- communicating with users/customers about the services provided, including the provision of technical support and customer service;
- financial and accounting activities and the administration, processing and collection of payments in connection with the services;

We may process all of the above categories of personal data for the above purposes.


4.3 Purposes of processing personal data related to the pursuit of the legitimate interests of brainit.sk or third parties

All such purposes include:

Legitimate interest - the conclusion, performance, modification or termination of a contract with the Customer in cases where the Customer is a legal entity and/or acts through its attorney/legal representative. The purposes relating to the exercise of such Legitimate Interest include all of the activities set out in clause 4.2 above.

Legitimate interest - exercising and protecting the legal rights and interests of brainit.sk and assisting in exercising and protecting the legal rights and interests of Customers, other persons associated with brainit.sk, relying parties, brainit.sk employees, persons processing personal data on behalf of brainit.sk and brainit.sk business partners:

- establishing, exercising or defending legal claims by the aforementioned persons, in court, including the filing of complaints, notices, etc. with the relevant governmental and judicial authorities, reproducing the stored information to the extent necessary to fulfill the purpose;
- taking measures to suspend the provision of services in case of violation of the General Terms and Conditions or in case of non-compliance with the Policies and Procedures of brainit.sk;
- reproduction of information in connection with electronic identification carried out at the request and for the purpose of protecting the rights and legitimate interests of the Cooperating Party;
- reproduction of information in connection with the use of electronic registered mail at the request and in order to protect the rights and legitimate interests of the sender/recipient;
- managing and servicing complaints, notifications, requests, etc;
- recovery of claims against brainit.sk, including through assignment to third parties, as well as the transfer of such claims to third parties.

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Legitimate interest - the provision of services and their normal functioning:

- maintenance and management services;
- taking action against malicious activities against the security and normal functioning of services;
- identifying and resolving technical issues related to service functionality;
- creating a secure environment for the exchange of messages between the Customer, brainit.sk and the Relying Party.

We may process all of the above categories of personal data for the above purposes.

4.4 Express consent


Your data may be processed on the basis of your explicit consent, in which case the processing is specific and to the extent and to the extent provided for in the relevant consent.

5. WITH WHOM WE SHARE PERSONAL DATA

Brainit.sk may disclose your personal data to third parties only as set out in this Policy, the General Terms and Conditions, other terms and conditions and Policies applicable to the services you use and in the cases provided by law.

Brainit.sk may disclose your personal information to third parties:

- If this is necessary to comply with a legal obligation of brainit.sk, for example in the case of an obligation to provide information:
 - the relevant government, municipal or judicial authorities;
 - the verification (audit) body;
- If necessary to provide services such as:
 - to banks and payment service providers in connection with payments made;
 - Relying Parties;
 - to persons to whom documents are sent for signature or signed using our services;
 - postal and telecommunication services of operators in the performance of communication between the customer and brainit.sk;
- If necessary to protect the rights or legitimate interests of brainit.sk, third parties or users/customers. In such cases, brainit.sk may disclose your personal data:
 - government, municipal and judicial authorities;
 - private and public bailiffs;
 - Lawyers;
 - notary public;
- Those acting as processors of personal data on behalf of brainit.sk, such as cloud service providers, brainit.sk registration authorities (if such activities have been outsourced to an external party), accounting service providers, etc.
 - brainit.sk uses carefully selected partners, subcontractors and service providers who may process personal data on behalf of brainit.sk. Such parties include specialist data centres for the reliable and secure hosting of server and network equipment, cloud system and service providers, providers of automated identification services, other IT services, etc. In addition, we regularly appoint digital marketing agents to carry out

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marketing activities on our behalf, which may also lead to compatible processing of personal data.

- In cases where the user/customer has given his/her explicit consent;
- In other cases provided by law.

6. TRANSFER OF PERSONAL DATA OUTSIDE THE EU

Brainit.sk does not transfer personal data relating to users/customers to countries outside the EU.

7. HOW LONG WE KEEP PERSONAL DATA

Brainit.sk processes and stores information about users/customers until the respective purposes for which it was collected and processed are fulfilled.

In accordance with its internal policies and procedures and applicable laws, brainit.sk processes and stores information as described in the certification policies for the qualified and trusted services provided by brainit.sk.


The basic retention periods for personal data are:

- if a qualified certificate is issued 10 years from the date of revocation or expiry of the certificate in question
- if a 'non-qualifying' certificate is issued, 7 years from the date of revocation or expiry of the certificate in question

8. WHAT ARE THE RIGHTS OF USERS/CUSTOMERS AND HOW CAN THEY EXERCISE THEM

Under the Privacy Policy, users/customers have the right to:

- access to your own personal data, which includes the right to obtain confirmation as to whether we are processing personal data about you and, if so, the right to obtain information about the processing of such data (purpose of processing, categories of personal data, recipients, duration of storage, source of personal data, etc.),
- to correct your incorrect or outdated personal data and to possibly update and complete it (depending on the type of processing),
- restricting the processing of your personal data if:
 - you challenge the accuracy of your personal data while we verify its accuracy,
 - the processing is unlawful, you object to the erasure of your personal data and instead request the restriction of its use,
 - We have no use for your data but you need it to prove, exercise or defend legal claims,
- deletion of your personal data (if one of the grounds of Article 17(3) GDPR is not met), in the options that personal data:
 - are unnecessary for the purposes for which we obtained or processed them,
 - were processed illegally,
 - it is necessary for them to be deleted in order to comply with our legal obligation,
- the right to complain to the Data Protection Authority.

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Some of these rights are only valid with certain exceptions further defined in the GDPR and only on the condition that you can be identified - we will accept your requests in accordance with these legal conditions. You can exercise your rights with us in paper or electronic form by contacting us at the contact details above.

9. CHANGES TO THE PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect any changes in the processing of your personal data or to comply with changes in applicable law.

Any changes we may make to the Application will be posted on the Application as well as on the website: <https://nfqes.com>

This document is published on the brainit.sk website in Slovak. In case of any discrepancies, the Slovak text shall prevail.