

Principles of Processing and Protection of Personal Data

I. Basic Provisions

1. The controller for the purposes of processing personal data pursuant to Section 5(o) of Act No. 18/2018 Coll. on the Protection of Personal Data, as amended (hereinafter the „Act“) is **TRISPO s.r.o., with its registered office at Podjavorinskej 770/4, 811 03 Bratislava, IČO: 54 329 931, e-mail: info@trispo.eu, telephone number: +421 907 899 003.** (hereinafter: „controller“).
2. The contact details of the controller are the postal address: **Podjavorinskej 770/4, 811 03 Bratislava, Slovak Republic;** e-mail: **info@trispo.eu.**
3. The data subject is a client – a natural person who has concluded with the controller a contract for the provision of services under the legal order of the Slovak Republic through the platform **<https://www.trispo.eu/>** or who has set up a client account at **<https://www.trispo.eu/>**.
4. Personal data means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to a certain identifier, such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

II. Personal Data Processed

1. The controller processes the personal data provided to it by the data subject upon conclusion of the contract or upon registration of a client account. These personal data are: e-mail address, telephone number, first name, surname, sex, date of birth, login credentials for the client account, billing and payment details, information about purchased courses and made-available content, and technical data (IP address, login records, cookies to the necessary extent). The personal data may be made available to providers of IT and hosting services, accounting and tax advisors, payment service providers and public authorities, where required by law.

III. Legal Basis and Purpose of Processing Other Personal Data

1. The legal basis for processing other personal data is:
 - performance of the contract between the data subject and the controller pursuant to Section 13(1)(b) of the Act,
 - compliance with a legal obligation pursuant to Section 13(1)(c) of the Act (e.g. keeping accounts, etc.),
 - the legitimate interest of the controller in providing direct marketing (in particular for sending commercial communications and newsletters) pursuant to Section 13(1)(f) of the Act, which is directly related to the services provided.

IV. Retention Period of Personal Data

1. The controller retains personal data for the period necessary to exercise the rights and obligations arising from the contractual relationship between the data subject and the controller and to assert claims arising from these contractual relationships.
2. Upon expiry of the retention period for personal data, the controller shall erase the personal data.

V. Rights of the Data Subject

1. Under the conditions laid down in the Act, the data subject has the right:
 - the right of access to their personal data pursuant to Section 21 of the Act,

- the right to rectification of personal data pursuant to Section 22 of the Act, or to restriction of processing pursuant to Section 24 of the Act,
 - the right to erasure of personal data pursuant to Section 23 of the Act,
 - the right to object to processing pursuant to Section 27 of the Act,
 - the right to data portability pursuant to Section 26 of the Act,
2. Furthermore, the data subject has the right to lodge a complaint with the Office for Personal Data Protection if they believe that their right to the protection of personal data has been infringed.
 3. Detailed information on the rights in connection with the processing of personal data is provided below.

VI. Conditions for Securing Personal Data

1. The controller declares that it has adopted all appropriate technical and organizational measures to secure personal data.
2. The controller has adopted technical measures to secure data storage and storage of personal data in electronic form, in particular by means of a password and a firewall.
3. The controller declares that only persons authorized by it have access to the personal data.
4. The controller does not intend to transfer the data subject's personal data to a third country (a country outside the EU) or to an international organization.

VII. Final Provisions

1. The controller is entitled to amend this document. It will publish the new version of the personal data protection terms on its website and will also send the data subject the new version of these terms to the e-mail address that the data subject provided to the controller.

Notice of the Rights of the Data Subject

1) On the basis of a written request, the data subject has the right to require the controller to provide:

1. **confirmation** as to whether or not **personal data concerning them are being processed**; the controller is obliged to fulfil this requirement of the data subject free of charge,
2. in a generally comprehensible form **information about the processing of personal data and the purpose thereof** in the controller's information system. The data subject is entitled to be acquainted with the procedure of processing and evaluation. The controller is obliged to fulfil this requirement of the data subject free of charge,
3. in a generally comprehensible form, precise **information about the source** from which it obtained their personal data for processing; the controller is obliged to fulfil this requirement of the data subject free of charge,
4. in a generally comprehensible form, **a list of their personal data** that are subject to processing; the controller is obliged to provide this information free of charge
5. **rectification or erasure of their incorrect, incomplete or outdated personal data** that are subject to processing; the controller is obliged to fulfil this requirement of the data subject free of charge. Until the rectification is carried out, the data subject has **the right to restriction of the processing of personal data**.
6. **transfer of personal data**. On the basis of a written request, the data subject has the right to transfer the processed personal data to another controller.

The right of the data subject may be restricted only where such restriction arises from a special act, or where exercising it would breach the protection of the data subject or would infringe the rights and freedoms of others. **The controller is obliged to notify such restriction in writing, without undue delay, to the data subject as well as to the Office for Personal Data Protection of the Slovak Republic.**

2) On the basis of a free written request, the data subject has the right, with the controller, to **object** to:

1. **the processing of personal data** for direct marketing purposes, the use thereof,
2. **the provision** of personal data listed for direct marketing purposes.

3) The data subject furthermore has the option to **at any time** object, with the controller, **object** to the processing of personal data by stating legitimate grounds or by submitting evidence of unauthorized interference with their rights and legally protected interests that are or may be, in the particular case, harmed by such processing of personal data; unless prevented by statutory grounds and provided it is demonstrated that the data subject's objection is justified, the controller is obliged to block the personal data whose processing the data subject objected to without undue delay and to erase it as soon as circumstances permit.

4) The data subject has the right not to be subject to a decision of the controller that would have legal effects or a significant impact on them, if such a decision is issued solely on the basis of automated processing of their personal data. The data subject has the right to request the controller to review the issued decision by a method other than the automated form of processing, whereby the controller is obliged to comply with such a request by ensuring that an authorized person plays the decisive role in the review. The controller shall inform the data subject of the method of review and the outcome of its findings no later than 30 days from the date of receipt of their request. This right of the data subject does not apply if:

- it is provided for by a special act in which measures to safeguard the legitimate interests of the data subject are laid down,
- within the framework of pre-contractual relations or during the existence of contractual relations, the controller issued a decision granting the data subject's request,
- or if the controller, on the basis of the contract, has adopted other appropriate measures to safeguard the legitimate interests of the data subject.

5) The data subject **has the right to compensation for damage**, which the data subject may assert if they suffer pecuniary or non-pecuniary harm in connection with a breach of the controller's obligations. The data subject also has the **right to bring the matter before a court** in the event of asserting their rights on the grounds of compensation for damage

If the data subject does not have full legal capacity, their rights may be exercised by a legal representative. If the data subject is deceased, their rights may be exercised by a close person.

If the data subject wishes to exercise their above-mentioned rights in relation to the Controller, the data subject may contact the Controller using the contact details provided above.

Updated, 01.07.2026