



PRIVACY POLICY OF THE PARTNER PORTAL

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Privacy Policy of the Partner Portal

General Provisions

This Privacy Policy describes how **ADEON International, spol. s r. o.** (hereinafter referred to as the “Distributor”, “We”) collects, uses, and protects personal data provided on the Partner Portal (<https://order.adeon.international/>).

1. Who we are

Data Controller: ADEON International, spol. s r. o. **Address:** Mierová 29, 821 05, Bratislava – mestská časť Ružinov, Slovenská republika. **IČO:** 54 974 631. **Email for inquiries:** privacy@adeon.international

2. What personal data do we process and use

We process personal data of the following two categories of subjects:

- A. Representatives of Partners (Resellers):** first name, last name, company name, company registration code, email address, contact phone number, position, IP address, login to access the Partner Portal.
- B. End users (clients of Partners):** first name, last name, email address, company name, company registration code. These data are provided by the Partner to order subscriptions to the Solutions.

3. Purpose and legal grounds for processing personal data

We process personal data for the purpose of:

- **Performance of the contract (Art. 6(1)(b) GDPR):** To register the Partner, process orders, generate keys activation and provide access to the Solution (software).
- **Legitimate interest (Art. 6(1)(f) GDPR):** To protect our IT system against fraud, manage the partners network and marketing communications with Partners (B2B).
- **Legal obligation (Art. 6(1)(c) GDPR):** To maintain accounting records and comply with Slovak tax requirements.

4. To whom we transfer personal data

Personal data may be transferred to fulfill your order for Solutions to the following entities:

- **Software Manufacturers (Vendors):** To order a subscription (may include transfer outside the EU if the manufacturer is located in the USA or another country).
- **Sub-distributors:** If the order is placed through a regional representative.
- **IT providers:** Companies that provide hosting for our Portal and the operation of the CRM system.

5. Cross-border data transfer

Since we work with Partners from different CIS countries, data may be transferred outside the European Economic Area (EEA). In such cases, we use the **Standard Contractual Clauses (SCC)** approved by the European Commission to ensure data security.

6. Retention period of personal data

- The Partner's personal data is stored for the entire term of the Partner Agreement and 5 years after its termination (in accordance with archiving requirements).
- The End Users' personal data is stored for the term of the subscription and 2 years after to provide technical support and verify the legality of updates.

7. Your rights (according to GDPR)

You (and your customers) have the right to:

- Access to your personal data.
- Rectification if your personal data is inaccurate or incomplete (by writing to privacy@adeon.international).
- Erasure of your personal data ("right to be forgotten").
- If necessary, to restrict the processing of your personal data (by writing to privacy@adeon.international).
- Portability of personal data (transfer of your personal data to another controller).
- Filing a complaint with the supervisory authority, which is the Office for the Protection of Personal Data of the Slovak Republic (Úrad na ochranu osobní údajov SR).

8. Security

We have implemented appropriate technical measures: data encryption (SSL/TLS), restriction of personnel access, regular backups and monitoring of the Portal's vulnerabilities.

9. Policy Changes

We reserve the right to amend this Privacy Policy, including to reflect changes in applicable legal requirements. We encourage you to review this Policy periodically.