

NOTICE TO INDIVIDUALS UNDER ARTICLE 13 OF THE GENERAL DATA PROTECTION REGULATION (GDPR) REGARDING THE PROCESSING OF PERSONAL DATA

0. Use and applicability of this privacy notice

CLUEKIT, digitalni marketing, d.o.o., Podbreznik 15, 8000 Novo mesto, company reg. no.: 9084614000, Tax ID. no.: SI 92929699, Slovenia, Europe, namely the owner and supplier of the **Buzztik Service** and the <https://buzztik.com/> website (hereinafter: **we, us, our**, the **company, organisation** or **the controller**) who can be reached at info@cluekit.com or through the messaging/contact module on our website.

The company is the owner and provider of the **Buzztik Service** software program / mobile application (regardless of version or trial status) with the core functionality as described on the <https://buzztik.com/> website (hereinafter: the **service** or the **product/platform**), as the website is updated from time to time, whereby the software is the proprietary intellectual property of the controller and is made available to you via the <https://buzztik.com/> website.

The specificity of our business model means that we may share your personal data with clients (i.e. marketing agencies, brand owners, international businesses, etc.) (hereinafter: **clients**) that use our service (as listed below) so that they may find our content creators (i.e. influencers) and reach out to them for collaboration on projects.

If, as an individual, you want to obtain information about the processing of your data by an individual client (i.e. as an individual controller), we advise you to contact the client directly.

Unless otherwise stated, the terms of the General Data Protection Regulation (e.g. personal data, processing, controller, processor, etc.) appearing in this notice have the same meaning as the terms of the GDPR regulation in question.

This general information on the processing of personal data may be updated from time to time in order to better reflect changes in data protection or for other operational and legal reasons.

If we change this notice significantly, we will publish the news on our website or send a notification within the service, or we shall inform end users (individuals) via e-mail.

Feel free to read the short section summaries provided at the beginning of most sections or read the legally binding text below each summary.

We truly hope that you find the contents contained herein understandable. Should you require any additional information or clarifications regarding the processing of your personal data and the use of our products and services, feel free to reach out to us at info@cluekit.com.

- **1. Introduction**

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- **1.1 Information on the controller of your personal data**

Summary: Information on us (i.e. the data controller responsible for your personal data)

CLUEKIT, digitalni marketing, d.o.o.,

Podbreznik 15,

8000 Novo mesto,

company reg. no.: 9084614000, Tax ID. no.: SI 92929699,

Slovenia, Europe

(hereinafter: ***we, us, the controller, organisation or company***)

A data protection officer has not yet been appointed by the company. You can send your enquiries regarding the processing and protection of personal data to info@cluekit.com.

- **2. Data processing activities that relate to our websites, communication, sales and delivery of our products, our general marketing and other company operations**

Summary: The following is an overview of when we process your personal data, what personal data we process, why we process said data, what underlying legal basis allows us to do, how long we keep your data in each case.

2.1 Visiting and using our websites

2.1.1 Visiting our website involves the placing of necessary cookies

Summary: We automatically place necessary cookies on your device when you visit our website. These cookies are necessary so that our website may be displayed and function properly. These cookies do not typically reveal any information about your browsing habits and preferences (see our dedicated [Cookie Policy](#) to learn more).

When: When you visit our website, we automatically place necessary cookies on your device.

Data: Necessary cookie data which typically only reveals technical information about your device (see our [Cookie Policy](#) to learn more).

Purpose: Necessary cookies are essential for the correct functioning of our website and enable key functions like page navigation, display features, page responsiveness, etc. (see our [Cookie Policy](#) to learn more).

Legal basis: We are legally permitted to place necessary cookies on your device without consent.

Data retention: Necessary cookie data can either be stored for the duration of your browsing session or longer (see our [Cookie Policy](#) to learn more).

2.2 Consenting to our use of analytical cookies

Summary: When you visit our website, we may place analytical cookies on your device. These cookies are provided to us by our service providers such as Alphabet Inc. (i.e. Google) and others, whereby they make use of automated technologies to collect and analyse information which includes personal data (such as your IP address) to understand how you use our website in order to tailor our site user experience or even increase the effectiveness of our future ad campaigns. These cookies might reveal information about your browsing habits and preferences (see our [Cookie Policy](#) to learn more).

When: When you visit our website and click the relevant button in our cookie pop-up.

Data: The information we obtain in this manner may include your device's IP address, identifiers associated with your devices, the types of devices connected to our services, web browser characteristics, device characteristics, language preferences, referring/exit pages, clickstream data, and dates and times of website or app visits (see our [Cookie Policy](#) to learn more).

Purpose: Our analytical cookies help us understand how visitors interact with our websites by collecting and reporting usage information. The intention is to improve features, evaluate and optimise the website user experience, and potentially improve the effectiveness of our marketing (see our [Cookie Policy](#) to learn more).

Legal basis: Where required by applicable law (e.g. if you are a resident of the European Economic Area), we will obtain your consent before placing analytical cookies on your device.

Data retention: Analytical cookie data can either be stored for the duration of your browsing session or longer (see our [Cookie Policy](#) to learn more).

2.3 Consenting to our use of marketing cookies for online tracking and interest-based advertising

Summary: When you visit our website, we may also place marketing cookies on your device. These cookies are provided to us by our service providers such as Alphabet Inc. (i.e. Google), Meta Platforms Inc. (i.e. Facebook) and others, whereby these cookies make use of automated technologies to collect and analyse different information, including personal data (such as your email, IP addresses, search

history, clicks, preferences, interests) for targeted advertising purposes across the web. These cookies reveal information about your browsing habits and preferences (see our [Cookie Policy](#) to learn more).

When: When you visit our website and click the relevant button in our cookie pop-up.

Data: Data collection takes place both on our website and on third-party websites where our providers' cookies, web beacons, pixels and other similar technologies have been placed on your device and where your inferred interests, browsing context, demographic data as well as other online activities over time have been collected through automated means (see our [Cookie Policy](#) to learn more).

Purpose: Our marketing cookies are used to track visitors across different websites. The intent is to increase the effectiveness of our ads by enabling target- and interest-based advertising on other online platforms, websites and ad networks (i.e. when you use Google search, Facebook, etc.) (see our [Cookie Policy](#) to learn more).

Legal basis: Where required by applicable law (e.g. if you are a resident of the European Economic Area), we will obtain your consent before placing marketing cookies on your device.

Data retention: Please see the information for each individual cookie provider in our [Cookie Policy](#).

2.4 Communication, sales and delivery of our products

2.4.1 When reaching out to us both on and off our websites

Summary: When you reach out to us (e.g. by sending an email to an address that belongs to us, messaging us through our Facebook page or Instagram profile, etc.), we shall process any data you might share (or have shared with us in the past) in order to respond to you or fulfil your request.

When: When you choose to reach out to us or contact us (i.e. by sending an email to an address that belongs to us, submitting a question through our chat module, reaching out to us through our official email channels, social media platforms, or in communication with our employees/agents or via other means).

Data: We may process any data/information you disclose during your use of our service (such as your name, email address, billing address, etc.) or which we might already have and require to formulate our response/solve your issue.

Purpose: In order to respond to emails, messages, formal inquiries, proposals, support, troubleshooting and other inbound communication.

Legal basis: We carry out these processing activities because processing might be necessary for the performance of a contract to which the person reaching out to us is a party or in order to take steps at the request of the data subject prior to entering into a contract.

Data retention: We typically do not keep communication data after responding to you. An exception to the aforementioned can be made if messaging or other communication had been performed through the use of a dedicated service (i.e. email, chat module, etc.), whereby we may keep data in such systems for up to 3 years after having received it.

In certain rare cases, we might keep parts of the data/communication for a longer period, if it is evident that certain data is needed in a legal or other official proceeding that is being carried out.

If such communications took place through platforms such as Facebook, please refer to the data retention periods that Meta Inc. or other platform providers might offer, as data deletion in such circumstances is not solely dependent on us.

2.4.2 When registering a Content creator or Client account with us

Summary: We process your username, email, password for account sign-up and authorisation purposes so that you can register an account with us. We also use your email in order to communicate essential service/product related information.

When: When you sign up or sign in to use our service as a Content creator or Client by providing your email and login credentials.

Data: We process your username, email, password and potential bank account information. We may also process certain technical data such as data logs (for technical support purposes) and your account customisation preferences.

Purpose: Sign-up and sign-in account authorisation as well as account management and security purposes so that you can use our platform.

We use the email that is tied to your account in order to offer you password management and restoration capabilities as well as technical and customer support and in order to communicate essential service-/product-related information to you (i.e. inform you of important product issues, updates and changes to our policies and terms, etc.).

Legal basis: Contractual (i.e. the Buzztik Creator Terms of Service or an individual agreement that we have concluded with you as a Client).

Data retention: Until you decide to delete your user account.

Note that we may irreversibly anonymize and keep such anonymized data that has been tied to your account indefinitely (whereby this data shall not be attributable to you in any way).

2.4.3 When wishing to communicate transactional/essential information in connection with your use of our service

Summary: E.g. when we want to pay out Creator Earnings to you or communicate other essential information to you.

When: When Clients purchase your Creator Content from us or when other transactions are performed that we are required to notify you about.

Data: We may process any data/information you have offered to us for this purpose in order to carry out the transactions and pay out the Creator Earnings to you (such as your name, email address, billing address, bank information, content type/name) or which we might already have and need in order to formulate our transactional/essential messages.

Purpose: To pay out Creator Earnings and communicate transactional/essential service-/product-related information to you (i.e. notify you that an order had been placed in relation to your creator content, inform you of important product issues, updates and changes to our policies and terms, get in touch with you regarding changes to estimated product delivery dates, etc.).

Legal basis: We carry out these processing activities because processing is necessary to fulfil the contract that we have concluded with you (i.e. the Buzztik Creator Terms of Service or an individual agreement that we have concluded with you as a Client).

We may also be required to perform the above mentioned data processing because we are required to do so under law (i.e. sending you an invoice) or on the basis of our legitimate interests (i.e. providing functioning and safe products). In certain rare cases, the above stated processing might be performed by us in order to protect your vital interests (or the vital interests of another natural person).

Data retention: We typically keep account related data until you delete your account. We do not keep communication data after communicating with you. An exception to the aforementioned can be made if messaging or other communication had been performed through the use of a dedicated service (i.e. email, chat module, etc.), whereby we may keep data in such systems for up to 3 years after the receipt of communication.

If such communications took place through social media platforms on which we have our official profiles/pages (e.g. Facebook, Twitter, etc.), please refer to the data retention periods that the providers of such platforms might offer, as data deletion in such circumstances is not solely dependent on us.

2.5. General marketing activities

2.5.1 Sending email marketing messages to new consenting customers

Summary: When you consent to receiving our marketing messages (e.g. newsletters, etc.) via email or other channels we shall send marketing messages to the email address that you entered for this purpose, whereby every email shall always contain an “unsubscribe” link. You can also withdraw your consent at any time by sending a free form email to info@cluekit.com. We shall not sell or share your email and other related data with any other third party. The data is shared with Klaviyo Inc. a service provider that we use for sending marketing emails.

When: When you're open to hearing from us and consent to receiving our various email marketing messages (e.g. newsletters, etc.) via email from time to time.

Data: When marketing to an individual, we typically process the individual's email address. We may also process the name of the individual (and potential other information) if this has been explicitly stated next to the input fields where the individual entered said data and consented to the processing.

Purpose: In order to send newsletters, product waitlist messages, new product launch notifications, discounts, surveys, promotion codes, information on contests and other marketing messages to consenting individuals to their email address.

Legal basis: We carry out these processing activities on the basis of your consent.

To withdraw consent, you can send a free form email to info@cluekit.com at any time or follow the unsubscribe link included in all of our marketing emails.

Note that we shall not sell or share your email and other related data with any other third party and shall only use it in the service which we use for sending emails.

Data retention: Until we receive your unsubscribe/consent withdrawal or data deletion request or if you have not opened our marketing emails for more than 3 years, whereby your data shall be permanently deleted in all of these cases.

2.6 Other company operations

2.6.1 When responding/applying to our open job postings as a potential candidate

Summary: If you respond or apply to any of our open job postings, we may process the data we receive from you in order to evaluate you as a candidate and carry out the necessary hiring procedures. We will not keep any data after the hiring procedure ends if we do not receive your explicit consent for

doing so. The data might be shared with external HR firms we might employ to help us with the hiring process.

When: When you respond/apply to our open job posting as a potential candidate through a dedicated online form or reach out to us for this purpose via email.

Data: The data that we might require as part of your application will be stated next to the job posting or dedicated online application form. We typically consider your general contact details (full name, email address, place of residence, age, nationality) as well as any information you might have included in your resume or CV and the details about your current or past employment or other working experience. We may also process any other information you elect to share with us for this purpose as well as any information you have made public on the Internet (such as your blog, Github or LinkedIn page).

Purpose: In order to evaluate you as a candidate and carry out the necessary hiring procedures and interviews.

Note that we may share the data with external HR firms we might employ to help us with the hiring process.

Legal basis: We carry out these processing activities on the basis of entering into negotiations for the conclusion of an (employment) or other work contract.

Should you explicitly consent to this, we may keep your data after the conclusion of the hiring process in order to keep you posted of any future job opportunities that may interest you. To withdraw consent, you can send a free form email to info@cluekit.com at any time or follow the unsubscribe link included in all of our job posting emails.

Data retention: Until the conclusion of the hiring procedure or until we receive your consent withdrawal or data deletion request or if you have not opened our job posting emails for more than 3 years, whereby your data shall be permanently deleted in all of these cases.

- **3. Additional general information**

3.1 How we might obtain your personal data

We use different methods to collect data from and about you, including:

Direct interactions

You may give us information about you by filling in forms or by communicating with us by phone, email or otherwise. This includes information you might provide when creating an account in order to use our service, subscribe to our newsletter, search for a product online with a tracking cookie from our partners installed on your device, place an order through our website, enter one of our

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competitions, promotions or surveys and when reporting a problem with our website or a bug in our service.

Third parties or publicly available sources

We may receive information about you if you visit other websites that place tracking cookies from our partners on your device (see our [Cookie Policy](#) to find out more). You may also post some of your information publicly online whereby we may process your social media handle in order to reach out to you (i.e. to ask if you would be willing to allow us to use your content for our marketing purposes or the marketing purposes of our client).

3.2. Additional explanations regarding the legal bases that we may use in order to carry out our processing activities:

3.2.1 When conducting processing activities in order to comply with a legal obligation

Our organisation may occasionally process personal data for the purposes of complying with legal requirements and other regulations, especially those governing the control of personal data, taxes, invoicing and payments (an example of this may include a court, inspector or other holder of public authority ordering our organisation to provide it with access to certain information which may include personal data).

This may also be the case if someone else had filed for criminal or other legal procedures to be instituted against us by local or international law enforcement agencies or other tax and regulatory bodies, which might therefore contact our organisation for additional details (e.g. when data from our database would have to be presented as evidence in criminal or civil proceedings, otherwise our organisation would suffer material and irreparable damages). Note that we shall only fulfil such requests if specifically required by local or international law and shall adhere to anonymizing or at least minimising any personal data that we are required to share.

In the above stated cases we will always strive to fulfil the request with full transparency, except in cases where this might not be possible as (in accordance with a particular request of an authorised body) notifying the public of such request might endanger the proceedings at hand.

3.2.2 When our processing activities are based on our legitimate interests

In certain cases (i.e. when evaluating the threat of fraud), we may rely on our legitimate interests in order to process certain payment-, order- or account-related data.

Our legitimate interests can also include instances where we process your personal data for our own internal business purposes and commercial interests, such as our own marketing activities (i.e. sending you marketing emails when you are our past customer unless consent is required under applicable laws and offering additional customer and technical support).

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3.2.3 When our processing activities are based on your consent

When you will have given your consent for the processing of your data for one or more specific purposes (such as sending email marketing messages to new consenting customers), your consenting to the processing of personal data is voluntary, whereby you may withdraw your consent at any time by contacting us at info@cluekit.com (or by clicking the “unsubscribe” link found in each of our marketing emails). If you do not provide personal data or if you withdraw your consent, this may mean that we will not always be able to fulfil the purposes for which we had collected the data.

Where consent has been withdrawn, we shall delete/anonymize any data we or our processors/service providers have kept on the basis of your consent.

Additionally, every effort will be made to remove relevant personal data from products/marketing campaigns and other distributions. However, this may not be possible in some situations, and in such cases, certain personal data that cannot be removed or otherwise anonymized (e.g. blurred) may still appear in publications, products and other media already in use or circulation.

3.2.4 When processing activities are necessary for the performance/negotiating of a contract

Typical situations include your acceptance of our Buzztik Creator Terms of Service or acceptance of an individual agreement that we have concluded with you as a Client.

This also includes instances when we need to communicate (i.e. negotiate) with you so that you may decide to enter into a contract with us (i.e. use our service, accept a job position with us, etc.).

3.3 How long do we store your personal data and when do we delete/anonymize it?

Our data retention periods depend on the legal basis and purpose of processing and are clearly stated for each type of data and data processing activity in section 2 above (or in our [Cookie Policy](#)).

Unless otherwise stated, we generally keep personal data for as long as it is necessary to fulfil the purpose for which the data had been collected, or for as long as legal obligation or regulation requires us to keep the data. After that, the data is deleted or anonymized, as mentioned above.

Our organisation undertakes to immediately remove any unnecessary data or data for which it has no legal grounds for processing/storing or regarding which the data retention periods have been exceeded.

3.4 Who might process your personal data and who do we share it with

3.4.1 Certain employees within our organisation

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Your personal data is processed by individual employees of our organisation or our external collaborators (hereinafter: “**employees**”). Employees of our organisation process only the personal data that they need for their work, but they can also share it with each other if their work tasks and the internal rules of our organisation allow them to do so. All of our employees are committed to confidentiality and the protection of personal data.

3.4.2 Public authorities

In certain cases, as prescribed by applicable law, our organisation must hand over your personal data to the competent state authorities which may have explicit legal grounds for reviewing certain data in the context of criminal, financial, tax or other types of official procedures/supervision. In certain cases, our organisation is compelled to provide data to third parties if such an obligation to provide or disclose the data is imposed on our organisation by law or on the basis of a valid legal right of a third party (see point 4.2.1 of this notice).

3.4.3 Our processors/service providers

In addition to the employees in our organisation, employees of entities that we engage so that they help us achieve the processing purposes described in sections 2 and 3 of this notice (hereinafter: “**processors/service providers**”), may also process personal data as confidential and only within the scope of the data processing agreement/standard contractual clauses, which have been concluded/put in place in relation to the processors/service provider in question.

The processors/service providers may only process personal data in accordance with the relevant data processing agreement/standard contractual clauses, and may not use the data to pursue any other purpose or interest.

The processors/service providers we may engage or cooperate with in the provision of our services that may need access to certain parts of your data:

- Consultants who cooperate with our organisation on the basis of relevant business and data processing agreements so that they can provide us with their accounting, legal, marketing, HR and other consulting services.
- External IT system maintenance providers and/or platform/service developers who cooperate with our organisation on the basis of relevant business and data processing that may gain limited access to our back-end or databases.

To obtain a detailed list of all of our processors/service providers, which data they process, the purposes we employ their processing/services for, as well as how we keep your data safe when engaging them, feel free to reach out to us at info@cluekit.com.

3.5 Transferring personal data to third countries and international organisations / research organisations and measures for protecting such transferred data

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3.5.1 Engaging contractual processors/service providers have their place of business registered in the USA or in other “third countries”

We operate globally and are thereby obliged to transfer your personal information to our main entity which is registered in the USA. The sale of our products and the provision of our services also require that we engage contractual processors/service providers as specified in sections 2 to 3 and point 4.4, whereby many of these processors/service providers have their place of business registered in the USA (or in other non-EEA countries where the GDPR is not applicable or where the requirements of the GDPR are not adequately reflected in national privacy laws, as the case may be) (hereinafter: “**third countries**”).

As stated above, we thereby regularly engage contractual processors/service who may process personal data on our behalf in third countries, whereby we only do so with the appropriate safeguards in place so that your data is safe and your data subject rights are respected.

Following decision C-311/18 (Schrems II) of the CJEU and the fall of the EU-US Privacy Shield we have reached out to our US-based processors/service providers and decided on alternative safeguards on a case-by-case basis in accordance with the guidance of the European Data Protection Board.

Where we could not put in place such appropriate safeguards (such as standard contractual clauses, data encryption, automated data deletion intervals, etc.), we ask for your specific consent before processing/sharing your data. More details on third country service providers and the measures taken to ensure your rights can be found in point 4.4 of this notice.

In addition to the purposes and providers listed in sections 2, 3 and point 4.4 of this notice, your data may also effectively be considered as transferred (i.e. disclosed) in the following situations, where we might have legitimate interests in buying/selling our assets in connection with entities that are registered in third countries:

- If we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets that may be registered in a third country (whereby we shall only do so if all applicable confidentiality and security requirements are offered to us by any potential buyer and their organisation). Please note that we shall only do so if all applicable confidentiality and security requirements are offered to us by any potential buyer and their organisation and shall never disclose any data in this way if the processing of such data had been carried out on the basis of your explicit consent.
- If all or a substantial part of our assets are acquired by a third party that may be registered in a third country whereby our assets may include parts of your data. Please note that we shall only do so if all applicable confidentiality and security requirements are offered to us by any

potential buyer and their organisation and shall never disclose any data in this way if the processing of such data had been carried out on the basis of your explicit consent.

Your data may also effectively be considered as transferred (i.e. disclosed) if we are required on the basis of EU law or the law of a Member State to disclose or share your personal data with an international organisation / public authority or other entity that might be registered in a third country, whereby we are required to do so to comply with a legal obligation.

You can obtain more detailed information on specific data transfers, safeguards and potential third country processors/service providers or research organisations we may be cooperating with by sending your questions to info@cluekit.com.

3.6 Processing special categories of personal data

- We do not knowingly process special categories of personal data.

3.7 What rights do you have in connection with your personal data and how can you exercise them?

You can contact us at any time and without hesitation at info@cluekit.com in connection with this notice or regarding the processing of your personal data by our organisation and our processors/service providers.

You can also contact us at the email mentioned above in order to send us your specific requests and for exercising your other rights which relate to your personal data and applicable local legislation or the GDPR. If we have reasonable doubts concerning your identity, we may request additional information to verify your identity.

As a data subject of the EEA, the GDPR gives you the opportunity to exercise the following rights with our organisation as the controller of your personal data:

Right of access

You have the right to obtain confirmation from us on whether personal data or personally identifiable information is being processed by us or our processors/service providers and the right to obtain a copy of your personal data that is being processed.

Right to rectification

You have the right to request the rectification of inaccurate personal data and to have incomplete data completed.

Right of objection

You have the right to object to the processing of your personal data for compelling and legitimate reasons relating to your particular situation, except in cases where legal provisions expressly provide

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for that processing. You also have the right to object/opt out of the processing of your personal data for direct marketing purposes by clicking on the unsubscribe link at the bottom of our marketing emails or by contacting us at info@cluekit.com.

Right to data portability

You have the right to receive the personal data that you have provided to us in a structured, commonly used and machine-readable format, and have the right to transmit it to other data controllers without hindrance. This right only exists if the processing is based on your consent or a contract and the processing is carried out by automated means.

Right to restrict data processing

You have the right to request the restriction of processing your personal data in certain cases.

Right of erasure (“right to be forgotten”)

You may request to erase your personal data if (i) it is no longer necessary for the purposes for which we had collected it, (ii) you have withdrawn your consent and no other legal ground for processing exists, (iii) you objected and no overriding legitimate grounds for processing exist, (iv) the processing is unlawful, or erasure is required to comply with a legal obligation.

Right to refuse or withdraw consent

In case we request your consent for processing, you are free to refuse it and can withdraw it at any time without any adverse negative consequences by contacting us at info@cluekit.com. The lawfulness of any processing of your personal data that occurred prior to the withdrawal of your consent will not be affected.

Automated decision-making

Under the GDPR you have the right not to be subject to decisions based solely on automated processing and have the right to be given more information about why any such decision has been made. Note that this is currently not applicable to our processing activities (see 4.8 of this notice).

Right to lodge a complaint with a supervisory authority

If you believe that the processing of personal data performed in connection with you by our organisation as the controller violates personal data protection regulations, you may, without prejudice to any other (administrative or other) remedy, lodge a complaint with the supervisory authority, in particular in the country where you have your habitual residence, your place of work or where the infringement is alleged to have taken place.

In Slovenia (the country where our registered office is) the authority is:

- Informacijski pooblaščenec, 22 Dunajska, 1000 Ljubljana, Slovenia, EU, email: gp.ip@ip-rs.com, phone: +38612309730, website: www.ip-rs.com.

A list of other EU supervisory authorities and their contact information can be found here:

https://edpb.europa.eu/about-edpb/about-edpb/members_en#.

3.8 Existence of automated decision-making and profiling

At the time of the publication of this notice, we do not carry out automated decision-making activities as referred to in Article 22(1) and (4) of the GDPR in connection with our websites, products and services.

Should this change, we will update this notice, and both inform you and make clear that you have the right not to be subject to decisions based solely on automated processing and shall give more information about why any such decision has been made.

3.9 Processing the personal data of persons under 16 years of age

Our organisation does not knowingly collect or otherwise process the personal data of persons under 16 years of age, as our products and services are not intended or directed towards such persons. However, our organisation may collect personal data regarding children below the age of 16 years of age directly from their parent or guardian, and with that person's explicit consent.

If our organisation subsequently finds out that it has processed the personal data of such a person without the consent of their parent or guardian, our organisation shall do everything necessary to delete all provided personal data.

At the address info@cluekit.com, the above described persons or their parents or guardians shall be able to submit their requests for the deletion of the data concerned at any time.

- 3.10 Who can you contact for further clarification regarding the processing of personal data in our organisation and regarding your rights?

You can contact us at any time and without hesitation at info@cluekit.com.

- 3.11 Security and protection of personal data

Our organisation carefully stores and protects personal data through organisational, technical and logical procedures and measures to protect data from accidental or intentional unauthorised access, destruction, alteration or loss, and unauthorised disclosure or other form of processing not explicitly stated in sections 2, 3 and point 4.4, or to which you have not expressly consented to.

To this end, our organisation has also adopted appropriate internal processes and set up various measures (e.g. assigning, using and changing passwords, locking premises, offices, server and

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workstation locations, regularly updating software and upgrading security-critical components, the physical protection of materials/data carriers containing personal data in specially designated places, the training of employees, etc.). Our organisation also demands these security commitments from its contractual processors.

- **4. Document version and updates**

Version and date of the last update of this notice

The text of this notice represents version 1.0 of this document.

Please reach out to us at info@cluekit.com in order to receive the previous version of this document.

This notice was last updated on the 31st of December 2024.