

PRINCIPLES AND RULES FOR THE PROTECTION OF PERSONAL DATA

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TurnaGO, s. r. o. (hereinafter referred to as "TurnaGO") stores and processes personal data in accordance with EU Regulation 2016/679 on data protection (GDPR) and the Personal Data Protection Act No. 18/2018 Coll.

I. CATEGORIES OF CLIENT PERSONAL DATA PROCESSED BY TurnaGO.

PURPOSES AND LEGAL BASIS

TurnaGO processes your email address, telephone number, name, surname, billing and delivery address for the purposes of delivering important information regarding the services/products you have ordered, support communication in the pre-contractual phase and after the conclusion of the contract, delivery, payment settlement and the creation of various statistics, which are, however, used only for internal purposes.

The legal basis for processing your email address and telephone number for these purposes is TurnaGO's legitimate interest in providing you with important information about the products you have ordered.

TurnaGO also processes your email address for the purpose of assigning it to your order when you communicate with our customer support representatives. The legal basis for such processing is our legitimate interest in providing you with quality customer support.

If you consent to receiving marketing information and newsletters from TurnaGO, TurnaGO will also process your email address and telephone number for the purpose of sending you marketing information and newsletters about various services/products offered by us. The legal basis for processing your email address for this purpose is your consent. You can withdraw your consent at any time by clicking on the unsubscribe link at the bottom of our marketing emails, by unsubscribing directly on the www.TurnaGO.sk portal, or by contacting TurnaGO customer service at info@turnago.sk

1. PERSONAL DATA PROCESSED WHEN COMMUNICATING WITH TURNAGO

When you communicate with our customer support representatives by email, phone, online or in person, we collect personal data such as your name, surname, address, telephone number and email address. We may also create event logs that are useful in diagnosing problems related to the use of our portal and record information about a support or service issue. In order to improve customer service

, we may also record and monitor conversations with customer support representatives and analyse feedback provided by users through voluntary customer opinion surveys, within the limits of applicable laws.

PURPOSE AND LEGAL BASIS

We use this information for the purposes of providing customer and product support and to monitor the quality and types of customer and product support we provide to our customers. The legal basis for processing such information for these purposes is TurnaGO's legitimate interest in providing you with quality customer support.

2. PERSONAL DATA PROCESSED WHEN CONCLUDING A CONTRACT WITH/THROUGH TURNAGO

GENERAL PERSONAL DATA

If you order a service/goods via the web portal www.turnago.sk, TurnaGO collects your first name, surname, email address, delivery and billing address, and telephone number. The data from your payment card that we process are: payment card number (the first six and last four digits of the payment card), name and surname of the cardholder, card expiry date, and cardholder's signature. The recipient of this personal data is also a company that handles payment processing and complies with payment card data processing security standards. VÚB a.s., as a third-party payment gateway administrator, processes customer payment card information when TurnaGO customers use a payment card to complete a purchase on the www.turnago.sk portal.

If you pay by transfer from a payment account, we process the account holder's first and last name and account number. If you pay by direct deposit to our account, we process the first and last name of the person who made the deposit. The recipients of this data are the banks through whose systems the payment is made.

We process your name, surname, email address, billing and delivery address, telephone number, and payment card details in order to process your order. The legal basis for processing this data is the performance of a contract or the implementation of pre-contractual measures based on your request. We also process your personal data as part of our fraud detection processes. The legal basis for processing your personal data for this purpose is our legitimate interest in protecting TurnaGO and our customers from fraudulent transactions.

3. PERSONAL DATA PROCESSED WHEN CREATING A CUSTOMER ACCOUNT

PURPOSES AND LEGAL BASIS

When you create a customer account with us, we will ask you to provide your email address. TurnaGO will process your email address because you use it together with your password to log in to your account. The legal basis for processing your email address for this purpose is TurnaGO's legitimate interest in protecting the security of your account.

TurnaGO also processes your email address for the purpose of delivering important information about your products, applications or customer account. The legal basis for processing your email address and name for these purposes is TurnaGO's legitimate interest in providing you with important security information or other information about your products, applications or customer account.

of TurnaGO to provide you with important security-related information or other information about your products, applications or customer account.

Furthermore, through your customer account, which contains your first and last name, telephone number, and billing and delivery address, you can more easily place your orders on our portal. The legal basis for processing this personal data is to simplify the pre-contractual phase, i.e. the completion of your order and the conclusion of the contract.

In your customer account, you can also set data such as your weight, height, measurements and age.

4. PERSONAL DATA PROCESSED WHEN PARTICIPATING IN COMPETITIONS ORGANISED BY TurnaGOom

PURPOSE AND LEGAL BASIS

When you participate in a competition organised or co-organised by TurnaGO, TurnaGO may, depending on the nature of the competition, process your personal data such as your name, surname, nickname, age, email address and photograph, which you provide when entering the competition. The purpose is to run the competition and identify the competitor. The legal basis for processing this personal data is our legitimate interest, namely the organisation of the competition.

If you become the winner of such a competition, your home address, date of birth and telephone number may also be processed for the purposes of processing, verifying and delivering the prize.

We will store your personal data for a period of 4 years from the date of its acquisition for the purpose of protecting our legitimate interests in the event of a complaint or other proceedings. When you enter the competition, we may ask for your consent to publish your name and photo on the website www.TurnaGO and on our Facebook profile if you win. If you give your consent, we will process this data for a period of 1 year. Failure to give consent is not a reason for refusing to allow a contestant to participate in the competition, nor does it reduce their chances of winning the competition.

II. LIST OF PROCESSED PERSONAL DATA OF JOB APPLICANTS AT TurnaGO and SUCCESSFUL APPLICANTS

If you are interested in working for TurnaGO, whether on your own initiative or on the basis of an advertised selection procedure for one of the vacant positions, TurnaGO processes your personal data, which includes, for example, your CV, to the extent of your academic title, name, surname, gender, date of birth, telephone number, e-mail address, home address, photograph, education details, career and work experience details (identification of current and previous employers, professional focus, awards, greatest work achievements, language skills and professional knowledge), hobbies as optional voluntary information. The accuracy and completeness of the information you provide may be verified by TurnaGO with the entities you specify.

PURPOSES AND LEGAL BASIS

The purpose of processing this personal data is to select future TurnaGO employees. The legal basis is TurnaGO's legitimate interest in selecting the most suitable candidates for job positions and your expression of interest in applying for a job at TurnaGO. Since things do not always work out the first time, TurnaGO will retain your personal data for another 3 years so that we can contact you with a job offer if a position becomes available or a new position suitable for you is created.

If you were successful in the selection process and agreed with TurnaGO on employment, whether in a permanent position or under one of the types of agreements under the Labour Code, we will process your personal data in addition to the above-mentioned personal data, based on labour law regulations, health insurance and social security regulations, tax regulations, etc. Such personal data may include, in particular, your birth number, identity card number, health insurance company with which you are insured, family relationship, whether you have children and their number (when claiming a tax bonus), and whether you are a holder of a ZTP card. If you are to join us, we are required by applicable law to request that you undergo an initial medical examination, the results of which will determine whether you are medically fit to work for us. We will also arrange for you to have regular check-ups as part of the occupational health service and process the legally required data on the results, which will be issued to you by the relevant doctor. The legal basis in this case is the relevant legislation in force concerning the health and fitness of employees to perform the relevant work and the occupational health service. In addition to the above personal data, TurnaGO also processes the contact details of a family member and their relationship to the employee for the purpose of contacting them in case of emergency situations (e.g. accident at work, absence from work, etc.). The aforementioned personal data will be processed for the necessary period of time, but at least for the duration of the employment relationship.

III. CATEGORIES OF RECIPIENTS OF PERSONAL DATA

FitActive is a company that cooperates with companies from all over the world. In order to provide you with the products you have ordered, we may need to transfer your personal data to other companies in other countries.

If you are a client, depending on the services you have ordered, we primarily provide your personal data to suppliers with whom you or we have concluded a contract for the performance of the ordered services. These recipients are primarily carriers, courier services, and financial administration authorities.

If you are an employee, your personal data will be provided to the health insurance company, the Social Insurance Agency, financial administration authorities and other relevant state administration authorities in accordance with the current legislation in force.

Other service providers

TurnaGO uses third-party cloud services such as Mandrill and Mailgun to help it send emails. These services track activities related to these emails, such as whether the recipient opened them, clicked on links in the emails, and made a purchase after clicking on them. Based on this data, TurnaGO analyses the level of interaction with the emails it sends.

TurnaGO uses the courier company GLS – General Logistics Systems to ship purchased products to customers.

IV. COOKIES AND SIMILAR TECHNOLOGIES

Websites

With the help of third-party analytics providers, when you visit our site, we collect certain information that helps us analyse how you and other visitors navigate the www.TurnaGO.sk website and compile aggregate statistics about website usage and response rates. This information includes your IP address, the geographical location of your device, your browser type, your browser language, the date and time of your request, the times of your visits, the pages you view, and the elements of the pages (e.g., links) that you click on. We may use cookies, pixel tags, web beacons, clear GIFs or other similar tools on our websites or in email messages to help us collect and analyse this information. We use this information to provide better and more relevant content on our site, to measure the effectiveness of our advertising, to identify and fix problems, and to improve the overall experience of our site. We may also use third-party services, one or more service providers, to serve online advertising on our behalf.

They may use pixel tags or similar technologies to collect information about your visits to the sites and use that information to deliver targeted advertising.

For more information about these practices and how to opt out of such collection and use of data by third parties – our service providers – please visit

Networkadvertising.org. If you do not want your data to be collected using these technologies, most browsers have a simple procedure for

automatically reject many of these technologies, or your browser may offer you the option to reject or accept them. If you are located in the European Union or other jurisdictions where we are required to obtain your consent to the use of cookies on our websites, you will be able to manage your cookie preferences on the relevant websites. However, certain cookies are necessary for the basic functioning of the websites and therefore cannot be disabled.

1. ANALYTICAL SERVICES

1. Google: Google Analytics, DoubleClick, AdWords conversions, and Google Dynamic Retargeting are used to track statistics about the location and demographic categories of users, their interests and behaviour on websites, and information about the devices they use to connect to a given website. We also use Google Search Console to help us understand how visitors find our website and to improve our search engine optimisation. Learn more about how this analytics data may be used, how you can control its use, and how you can opt out of Google Analytics' use of your data.
2. Facebook AdReporting: Facebook AdReporting provides global anonymous data about ad spots, how many people saw the content, clicked on it, etc. Learn more about how this analytics data may be used, how you can control its use

and how you can withdraw your consent to the use of your data by Facebook AdReporting.

3. Facebook AudienceInsights: The Facebook AudienceInsights service provides basic anonymous demographic data about the people we advertise to. The smallest viewable sample is 1,000 people. Learn more about how this analytics data may be used, how you can control its use, and how you can withdraw your consent to the use of your data by Facebook AudienceInsights.
4. Exponea: The Exponea service is used to track statistics about the website, online orders and demographic categories of users, their interests and behaviour on websites, and information about the devices they use to connect to the website. Learn more about how this analytical data may be used, how you can control its use, and how you can withdraw your consent to the use of your data by Exponea.
5. Freshmarketer: The Freshmarketer service is used to track anonymous user behaviour on websites and evaluate changes made to the website and their impact on user behaviour. Learn more about how this analytical data may be used, how you can control its use, and how you can withdraw your consent to the use of your data by Freshmarketer.
6. Iperceptions: The Iperceptions service is used to anonymously collect website usability feedback. A few percent of randomly selected website visitors are selected to anonymously answer a set of four questions. These responses are then stored anonymously. Learn more about how this analytical data may be used, how you can control its use, and how you can withdraw your consent to the use of your data by Iperceptions.
7. Optimizely: Optimizely is used to track anonymous user behaviour on websites and evaluate changes made to the website and their impact on user behaviour. Learn more about how this analytical data may be used, how you can control its use, and how you can withdraw your consent to the use of your data by Optimizely.
8. Hotjar: Hotjar is used to track anonymous user behaviour on websites and evaluate changes made to the website and their impact on user behaviour. Learn more about how this analytical data may be used, how you can control its use, and how you can withdraw your consent to the use of your data by Hotjar.
9. Pushalert – used for push notifications on websites. Learn more about how this analytics data may be used, how you can control its use, and how you can withdraw your consent to the use of your data by Pushalert.
10. Glami Pixel – used for product sales, where sales conversions are recorded. Learn more about how this analytics data may be used, how you can control its use, and how you can withdraw your consent to the use of your data by Glami Pixel.

2. RETARGETING SERVICES

1. Facebook PIXEL: Our website uses retargeting technology from Facebook Pixel, operated by Facebook. This allows us to show visitors who have already expressed interest in our products our advertising on the FitActive advertising network.
2. Sklik retargeting: Our website uses retargeting technology from Sklik retargeting, operated by Seznam.cz, a.s. This allows us to show visitors who have already expressed interest in our products our advertising on the FitActive advertising network.
3. RTB House: Our website uses retargeting technology from the RTB House service operated by RTB House. This allows us to show visitors who have already expressed interest in our products our advertising on the FitActive advertising network.

3. COOKIES

What cookies do we evaluate?

1. Basic cookies: these cookies enable the use of basic functions such as logging in as a registered user or pre-filling forms and remembering your preferences. If you disable these cookies, we cannot guarantee the full functionality of our website.
2. Operational cookies: these cookies are used to record and analyse visitor behaviour on the website and subsequently improve its functionality and appearance. If you disable these cookies, we cannot guarantee the full functionality of our website.
3. Advertising cookies are used to optimise the content and advertising displayed based on visitor habits and the effectiveness of advertisers' marketing communications. Thanks to these cookies, you will not be shown advertisements from areas that do not interest you unnecessarily often.
4. Third-party cookies are created and used by service providers such as Google Analytics, Google Adwords, Facebook, PAP, Exponea, Freshmarketer, Intercom, Iperceptions Optimizely, Hotjar, Zarget, Pushalert, Glami pixel, and Sentry. These services are integrated into our website because we consider them useful and completely safe.

V. CHILDREN UNDER 16

As the products offered through our portal may also be intended for persons under the age of 16, we process the data of these persons only for the purpose of processing orders, correctly mediating and reserving the ordered goods and providing customer service. The legal basis for processing the data of these persons is the performance of a contract or the implementation of pre-contractual measures based on the client's request.

We do not process the personal data of persons under the age of 16 for the purposes of direct marketing and promotion of services.

VI. UPDATES TO THE PERSONAL DATA PROTECTION RULES

In connection with the addition of new services and products, improvements to our current offerings, and changes in technology and laws, we may change these personal data protection rules from time to time. The date of the last revision of these personal data protection rules can be found under "Updated" at the top of this page. All changes will take effect upon publication of the revised privacy policy.

VII. RETENTION OF PERSONAL DATA

We will retain your personal data for as long as your consent remains valid, as long as we have a legitimate interest in retaining it, or as long as we are required to do so by applicable legislation. After the specified retention period for personal data has expired, your personal data will be destroyed.

Your right to erasure is described below in the section "Your rights". In this regard, you can contact us at info@TurnaGO.sk, where we will process your request regarding the protection of personal data within the statutory period.

If you are not satisfied with our response and believe that we are processing your personal data incorrectly, please contact the supervisory authority, the Office for Personal Data Protection, at <https://dataprotection.gov.sk/uouu/>.

VIII. YOUR RIGHTS

Under the General Data Protection Regulation, you have the right to request access to your personal data from TurnaGO and to exercise the following rights:

- to find out whether TurnaGO processes your personal data and, if so, what personal data it is and the reason for its processing
- the right to correct personal data - this allows you to correct any incomplete or inaccurate information we hold about you
- the right to erase personal data - this allows you to ask us to delete your personal data if there is no reason for us to continue processing it
- the right to data portability - you have the option to transfer your personal data in electronic and structured form from TurnaGO to another entity
- the right to restrict the processing of your personal data - you can ask us to suspend the processing of your personal data for a certain period of time, for example if you want us to prove its accuracy or the reason for its processing
- the right to object to the processing of your personal data - you have the right to object when personal data is processed on the grounds that the processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party, if the interests or rights of the data subject requiring the protection of personal data prevail over those interests, in particular if the data subject is a child. You may also object if personal data is processed for direct marketing purposes, including objecting to the fact that you are subject to a decision based solely on automated processing of personal data, including profiling

- the right to withdraw consent - if we process your personal data on the basis of your consent, you have the right to withdraw this consent at any time
- the right to lodge a complaint with a supervisory authority - the supervisory authority for personal data protection is the Office for Personal Data Protection, which you can contact if you believe that your personal data is not being processed in accordance with applicable legislation