



Nugis Platform Privacy Policy

Effective Date: October 8, 2025

The company **Sited, s.r.o.** (hereinafter referred to as "**we**," "**us**," or "**Controller**") respects your right to privacy and is committed to protecting personal data. This Privacy Policy (hereinafter referred to as the "**Policy**") explains how we collect, use, and protect personal data in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as "**GDPR**").

Article I.

Basic Provisions and Definitions

1. **Data Controller: Sited, s.r.o.** Registered office: Jakuba Kraya 2411/20, 060 01 Kežmarok, Slovak Republic Company ID (IČO): 50543709 Registered in the Commercial Register of the District Court Prešov, Section: Sro, Insert No.: 37977/P Contact email for data protection matters: **hello@nug.is**
2. **Data Subject:** A natural person whose personal data is being processed.
3. **Personal Data:** Any information relating to an identified or identifiable natural person.
4. **Processing:** Any operation or set of operations which is performed on personal data, such as collection, recording, organization, storage, alteration, retrieval, consultation, use, disclosure, erasure, or destruction.

Article II.

Scope and Purpose of Personal Data Processing

This Policy distinguishes between two main situations of personal data processing:

A) Sited, s.r.o. as DATA CONTROLLER In this role, we process the personal data of **our Clients** (representatives of companies who have ordered the Nugis service) and **visitors to our website**.



Category of Data Subjects	Categories of Processed Data	Purpose(s) of Processing	Legal Basis (GDPR)	Retention Period
Clients (their representatives)	First name, last name, job title, work email, work phone number, company billing information (Company ID, Tax ID, address), payment details.	<ul style="list-style-type: none"> • Performance of the Agreement, provision of the Service, customer support, invoicing. • Compliance with legal obligations (e.g., accounting and tax). • Sending marketing and informational communications about our products and services. 	<ul style="list-style-type: none"> • Art. 6(1)(b) – Performance of a contract. • Art. 6(1)(c) – Legal obligation. • Art. 6(1)(f) – Legitimate interest (direct marketing to existing clients). 	For the duration of the contractual relationship and subsequently for the period required by specific laws (e.g., 10 years for tax purposes).
Visitors to the nugis website	IP address, cookies, data from contact forms (name, email, message content).	<ul style="list-style-type: none"> • Ensuring the functionality and security of the website. • Communicating and responding to inquiries. 	<ul style="list-style-type: none"> • Art. 6(1)(f) – Legitimate interest. 	For the duration of the session or according to cookie settings. For the time necessary to handle the inquiry.

B) Sited, s.r.o. as DATA PROCESSOR In this role, we process the personal data of **Respondents** (end-users who fill out quizzes and forms created by our Clients).

1. The **Data Controller** of the Respondents' personal data is our **Client**. The Client determines the purposes and means of processing – i.e., what data to collect, why, and for how long.
2. We, as the Data Processor, process this data **solely based on the Client's instructions**, which are formalized in the **Data Processing Agreement (DPA)**.
3. **The scope and type of the Respondents' personal data processed are entirely at the discretion and under the responsibility of the Client, depending on the questions they choose to include in the interactive content. The Client may use the Platform to collect common personal data (e.g., name, email, age, address) as well as special categories of personal data (e.g., data concerning health, political opinions) under Article 9 of the GDPR.**



4. **WARNING TO THE CLIENT (DATA CONTROLLER):** The Client, as the data controller, bears full and exclusive responsibility for ensuring a valid legal basis for the processing of all personal data collected from Respondents (e.g., consent, performance of a contract, legitimate interest). In the case of processing special categories of personal data, the Client is obliged to meet one of the conditions under Art. 9(2) of the GDPR, which is typically the explicit consent of the data subject. Our company, as the Data Processor, does not verify the lawfulness of the purposes and legal bases established by the Client.
5. **If you are a Respondent and wish to exercise your rights (e.g., request data erasure), please contact the company (our Client) on whose behalf the quiz or form was created and to whom you provided your data.** We cannot make decisions about your data without an instruction from the Client.

Article III.

Rights of the Data Subject

As a data subject, you have the following rights:

1. **Right of access** (Art. 15 GDPR): You have the right to obtain confirmation as to whether or not personal data concerning you is being processed, and, where that is the case, access to the personal data.
2. **Right to rectification** (Art. 16 GDPR): You have the right to obtain the rectification of inaccurate personal data concerning you.
3. **Right to erasure ('right to be forgotten')** (Art. 17 GDPR): You have the right to the erasure of your personal data if one of the grounds in the GDPR applies (e.g., the data is no longer necessary for the purpose for which it was collected).
4. **Right to restriction of processing** (Art. 18 GDPR): You have the right to obtain the restriction of processing under certain conditions.
5. **Right to data portability** (Art. 20 GDPR): You have the right to receive the personal data you have provided to us in a structured, commonly used, and machine-readable format.
6. **Right to object** (Art. 21 GDPR): Where we process your data based on legitimate interest, you have the right to object at any time to such processing.
7. **Right to withdraw consent:** If processing is based on your consent, you have the right to withdraw that consent at any time.

You can exercise your rights by sending a request to the email address **hello@nug.is**.

Article IV.

Recipients and Data Transfers



1. In providing our Services, we use trusted partners (sub-processors) who help us ensure the functionality, security, and quality of the Nugis platform. We carefully select these partners and contractually bind them to uphold the highest data protection standards.
2. Overview of sub-processor categories:

Sub-processor Category	Purpose of the Provided Service	Examples of Providers	Processing Location	Transfer Mechanism (if outside EEA)
Cloud Infrastructure Providers	Application hosting, data storage, and backup.	Amazon Web Services, Google Cloud	EEA (e.g., Frankfurt, Ireland)	---
Payment Gateway Processors	Secure processing of Subscription payments.	Stripe, Inc.	USA	Standard Contractual Clauses (SCCs)
Transactional Email Providers	Delivery of system notifications (e.g., password reset).	SendGrid, Mailgun	USA	Standard Contractual Clauses (SCCs)
Customer Support and CRM Tools	Management and resolution of Client inquiries.	Intercom, Zendesk	USA / EEA	Standard Contractual Clauses (SCCs)
Analytics and Monitoring Tools	Usage analysis and platform performance monitoring.	Google Analytics, Sentry	USA	Standard Contractual Clauses (SCCs)
Accounting and Invoicing Services	Management of accounting and invoicing.	[E.g., external accounting firm]	Slovak Republic	---

3. We primarily process personal data on servers located within the European Economic Area (EEA). In the event of a data transfer to third countries (e.g., the USA), we ensure its protection through appropriate safeguards, primarily through Standard Contractual Clauses (SCCs) approved by the European Commission.



Article V.

Data Security

We have implemented appropriate technical and organizational measures to protect your personal data from loss, misuse, unauthorized access, disclosure, or alteration. These measures include, for example, encryption, access controls, and regular security audits.

Article VI.

Cookies

Our website uses cookies. For detailed information on what cookies we use and for what purposes, please see our **Cookie Policy**.

Article VII.

Final Provisions

1. We reserve the right to update this Policy at any time. We will inform you of significant changes on our website or by email.
2. If you have any questions regarding data protection, please do not hesitate to contact us at **hello@nug.is**.
3. If you believe that your data protection rights have been violated, you have the right to lodge a complaint with the supervisory authority, which is the **Office for Personal Data Protection of the Slovak Republic**, Hraničná 12, 820 07 Bratislava 27, Slovak Republic.