



# Statement on GDPR Compliance for the Nugis Platform

**Effective Date: October 8, 2025**

Sited, s.r.o., as the operator of the Nugis platform, is fully aware of the importance of personal data protection and privacy. This statement provides a clear summary of our approach to the Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter the "GDPR") and explains how the Nugis platform helps our Clients fulfill their data protection obligations.

## **Article I.**

### **Our Commitment to Data Protection**

At Sited, s.r.o., we consider data protection to be the cornerstone of trust between us and our Clients. The Nugis platform has been designed and developed from the outset in accordance with the key principles of GDPR, particularly "**Privacy by Design**" and "**Privacy by Default.**"

Our commitment in practice means that:

- **Lawfulness and Transparency:** We always process personal data lawfully, fairly, and transparently.
- **Data Minimisation:** We collect and process only the data that is strictly necessary for the specified purpose.
- **Security:** We implement robust technical and organizational measures to protect all data within our systems from loss, misuse, or unauthorized access.
- **Accountability:** We take full responsibility for adhering to the principles of GDPR within our processes.

## **Article II.**

### **Explaining the Roles: Controller vs. Processor**

To correctly understand responsibilities under GDPR, it is crucial to distinguish between two main situations:



Situation	Our Role (Sited, s.r.o.)	Client's Role	Who is Responsible?	Example
We process data about our Client	CONTROLLER	---	Us (Sited, s.r.o.)	Your company, contact, and billing information that you provide during registration and use of the Service.
The Client processes data about their customers (Respondents)	PROCESSOR	CONTROLLER	The Client	Any data (email, name, preferences) that the Client collects from Respondents through a quiz created in Nugis.

As your Processor, we act solely on your instructions. You, as the Controller, are fully responsible for the lawfulness of the collection and processing of your Respondents' data, including ensuring a valid legal basis (e.g., consent).

### Article III.

#### Data Processing Agreement (DPA)

According to Article 28 of the GDPR, the relationship between a controller and a processor must be governed by a written contract. Therefore, a **Data Processing Agreement (DPA)** is a standard and integral part of our contractual relationship with every Client.

Our DPA:

- Formalizes our obligations as your Processor.
- Defines the subject-matter, nature, and purpose of the processing of Respondents' data.
- Binds us to strict security measures, confidentiality, and providing assistance in fulfilling your obligations.
- Transparently governs the conditions for engaging other sub-processors.

By concluding the DPA, we provide you with the legal certainty that the processing of your customers' data through the Nugis platform is in full compliance with GDPR requirements.