

# Privacy Policy --Version 001/10.04.2022--

#### 1. Introduction

This Privacy Policy is addressed to all individuals (i.e. data subjects) who get access to and use any and all services of any of the following Internet sites: https://4thtech.io/, https://app.4thtech.io/, https://wiki.4thtech.io/ (without this list being exhaustive) ("you", "your" or "User"). It sets out the manner in which The 4th pillar Ltd., a private limited company, based in Slovenia at the following address: Parmova Ulica 53, 1000 Ljubljana, and its affiliates ("Company", "we" or "us") use and protect the information you transmit to us, if any when you get access, browse or otherwise use any of the above-listed sites (hereinafter referred to as the "Site").

It may be amended or supplemented at any time by Company, in particular, to comply with any legislative, regulatory, jurisprudential or technological developments. In such a case, the date of its update will be identified at the beginning of this policy. These modifications engage the User as soon as they are posted online. The company, therefore, invites the User to regularly consult this Privacy Policy in order to be aware of any changes.

# 2. Personal data

You have the opportunity to browse the Site without disclosing any personal information about yourself. However, you may not be able to benefit from certain information or services.

Indeed, some Personal Data will be requested if you complete a form on the Site (surname, first name, email address, telephone number, etc., hereinafter referred to as your "Personal Data"). By providing this information, you expressly agree that it will be processed by us for the purposes indicated in 1.2. below and, if applicable, only for the purposes stated at the end of each form.

We do not collect any Personal Data without your knowledge or consent. Only Personal Data provided voluntarily will be collected, data that we are committed to keeping in optimal conditions of security.

In addition, we do not collect or process sensitive Personal Data that directly or indirectly reveal your racial or ethnic origin, your political, philosophical or religious opinions, your trade union membership, your health and sexual life, and genetic data. Therefore, we request that you do not include such sensitive Personal Data about yourself or other persons in your communication and/or documents sent to us. Otherwise, we will consider that we have received the consent to use such Personal Data for the purposes of responding to your query.

# 1.1. Identity of the controller

The controller is The 4th pillar Ltd., a private limited company, based in Slovenia, Parmova Ulica 53, 1000 Ljubljana.

Email: hello[@]4thtech.io

# 1.2. Purposes of the treatment

We may process your Personal Data for the following purpose (s):

- Provision of the information or services that you have requested (in particular via the various forms of the Site);
- Improving the Site, our products, and our services (including cookies);
- Contacting you to propose services and offers adapted to your centres of interest;
- Contacting you to obtain additional information or clarifications in response to your reported incidents;
- Sharing information on social networks;
- Protecting our legitimate interests.

#### 1.3. Recipients

We may share your Personal Data with the following recipients to the extent we deem such disclosure or transmission to be necessary or desirable for satisfying the aforementioned purposes:

- Administrative, regulatory and judicial bodies (in Luxembourg or abroad as the case may be);
- IT service providers that support hosting and data storage functionalities of the Site;
- Law firms, consultancy and other agencies in case we engage them for investigating and/or advising us in connection with the incidents or communications reported by you.

## 1.4. Duration of retention of your Personal Data

We will not keep your Personal Data for longer than the time necessary for satisfying the aforementioned purposes, subject to the legal periods of limitation and to the situations where applicable laws require or allow Personal Data to be retained for a certain period of time for regulatory and compliance purposes.

# 1.5. Rights granted to data subjects

Subject to the limits set out in the applicable data protection laws, and in particular, in the EU General Data Protection Regulation 2016/679, you may benefit from the following rights.

# 1.5.1. Your right of access

You have the right to ask us for confirmation as to whether or not Personal Data relating to you are being processed and, where that is the case, access to the Personal Data and relevant information in that regard.

# 1.5.2. Your right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete

## 1.5.3. Your right to erasure

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You have the right to ask us to erase your personal information. However, we can refuse to erase your Personal Data for instance if we have a legal obligation to keep such Personal Data.

#### 1.5.4. Your right to restriction of processing

You have the right to ask us to restrict the processing of your information.

#### 1.5.5. Your right to object to processing

You have the right to object to processing that we carry out based on the legitimate interest we pursue. However, we remain able to process your information if we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims

#### 1.5.6. Your right to data portability

Where relevant, you have to right to request to receive Personal Data concerning you which you have provided to us on in a structured, commonly used, machine-readable format and to transmit it to another controller

#### 1.5.7. No automated decision making

You are hereby informed that no automated decision-making or profiling is conducted. You will be informed of the change in this regard.

# 1.5.8. Your right to complain

We work to high standards when it comes to processing your personal information. If you have queries or concerns, please contact me by writing a letter to the address: 41, rue du Puits Romain, z.a. Bourmicht (Atrium Business Park), L-8070 Bertrange, Luxembourg.

If you remain dissatisfied, you can make a complaint about the way we process your personal information to the competent data protection authority, in Luxembourg such authority is the CNPD (Commission Nationale pour la Protection des Données).

## 1.5.9. Your right to withdraw your consent

Where processing relies on your consent, notably via the "optin" mechanism, you can withdraw such consent at any time.

# 3. General information about cookies on the Site

The company, as the publisher of the Site, uses cookies. Cookies are text files of limited size to recognize your computer, your tablet, or your mobile to customize the services we offer. The information collected through cookies does not in any way identify you by name. They are used for our own purposes only and are never transmitted to third parties, unless you have previously consented to it or when the disclosure of this information is required by law, by order of a court or any administrative or judicial authority empowered to do so. to know. The information collected allows us to establish statistics on the attendance or more generally the use of our site, and to send you contents adapted to your centres of interest. The retention period of information collected through cookies does not exceed one year.

# 2.2. Setting your cookie preferences

#### 2.2.1. Accept or refuse the deposit of cookies at any time

When you first login to the Site, a banner briefly outlining information about cookies and similar technologies will appear at the bottom of your screen. This banner warns you that by continuing your navigation on the Site (by loading a new page or by clicking on various elements of the site for example), you accept the deposit of cookies on your terminal. Only the acceptance of cookies will remove the banner from your display.

#### Functional cookies

Certain cookies are strictly necessary for the operation of the Site or have the sole purpose of enabling or facilitating communication by electronic means. These include session ID, authentication, load balancing session, security cookies as well as cookies for customizing your interface. These cookies are fully subject to this policy as long as they are issued and managed by Company.

#### Persistent Cookies

This requirement applies to third-party cookies that are described as "persistent" because they remain in your device until they are deleted or expired. Because such cookies are issued by third parties, their use and deposit are subject to their own privacy policies. This cookie family includes audience measurement cookies, advertising cookies (which the Company does not use), and social network sharing cookies. Audience measurement cookies provide statistics on the use and use of various elements of the website (such as the content/pages you visited). These data contribute to improving the ergonomics of the Site. Two audience measurement tools are used on the Site:

• Google Analytics (deactivation module) : https://tools.google.com/dlpage/gaoptout?hl=fr

# 2.2.2. Tools for setting cookies

Most Internet browsers are configured by default so that cookies are allowed to be posted. You can change these standard settings so that all cookies are rejected systematically or that certain cookies are accepted or rejected according to their issuer.

# 4. Warning

The refusal of the deposit of cookies on your terminal is likely to alter your user experience as well as your access to certain services or features of the Site. If necessary, Company declines any responsibility concerning the consequences related to the degradation of your navigation conditions. These consequences cannot constitute damage and you cannot claim any compensation for this fact.

Your browser also allows you to delete existing cookies on your device or to notify you when new cookies may be placed on your device. These settings do not affect your navigation but you lose all the benefits of the cookie.