

**PRIVACY POLICY FOR OK DOCUMENT SERVICE  
VALID FROM 6 July 2022**

## 1 Initial Provisions

1.1 ANASOFT APR, spol. s r.o. with its registered office at Mlynská dolina 41, 811 02 Bratislava, Slovak Republic, Comp. ID: 31361552, Tax ID: 2020345778, registered in the Register of the District Court Bratislava I, Section Sro, Insert 6042/B (hereafter referred to as “ANASOFT”) is the operator of the website <https://okdokument.sk/> (hereinafter referred to as the “Website”), through which it provides the service of electronic signing of documents in the online environment (hereinafter referred to as the “OK Document Service”).

1.2 These rules of personal data protection describe how we process personal data in connection with the provision of the OK Document Service, used for electronic signing of documents in the online environment (hereinafter referred to as the “Privacy Policy”).

1.3 Personal data of the data subjects are processed in accordance with valid legal regulations effective in the territory of the Slovak Republic, in accordance with Act No. 18/2018 Coll., on personal data protection and on amendments to certain other laws (hereinafter referred to as the “Act”) and in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as “GDPR”).

1.4 The legal relationship between ANASOFT and the users of the OK Document service is governed by the [General Terms and Conditions](https://okdokument.sk/), valid and effective when using the OK Document Service, available on <https://okdokument.sk/>. (hereinafter referred to as “GT&Cs”).

1.5 This Privacy Policy is binding:

- a) for all users of the OK document Service within the meaning of the GT&Cs using the OK document Service as defined in the GT&Cs;
- b) for all visitors of the website <https://okdokument.sk/>;
- c) for all who contacted us via the website <https://okdokument.sk/>, either via the form or other channels (by phone, e-mail ...);
- d) for persons who do not have a user account set up in the OK Document Service and with whom the users of the OK Document Service sign documents (hereinafter referred to as the “Signatory”).

All together and indistinguishably as “data subjects”.

1.6 We obtain and subsequently process the personal data of the data subjects for various reasons, and thus, also for several purposes, always on the basis of the legal bases stipulated by the legislation.

1.7 ANASOFT may be in the position of the Controller as well as in the position of the Processor in connection with the provision of the OK Document Service and the operation of the website during the processing of personal data.

1.8 As the data subject, you have the choice of visiting our website, using the OK document Service, providing us with your personal data and to what extent. However, if you do not provide us with certain information that is necessary for the correct operation of the OK Document Service (e.g., data required for registration and creation of a user account), you will not be able to use some parts of the OK Document Service.

1.9 In order for us to be able to provide the OK Document Service for you effectively, you, as an OK Document service user, are obliged to provide your personal data correctly and truthfully. At the same time, in accordance with the [General Terms and Conditions](#) you are obliged to inform us without undue delay of any change in your personal data.

## 2 Type and extent of the processed personal data

2.1 The personal data of the data subjects that we process primarily belong to the category of common personal data to the following extent:

- a) name and surname, or title
- b) permanent residence address and/or correspondence address
- c) telephone number
- d) e-mail address
- e) bank account and other data (depending on what other data you provide in your user account)
- f) online identifiers (or metadata): IP address of the device, operating system of the device, GPS data, type and version of the browser from which you access the functionality of the OK Document Service.

2.2 In most cases, we process your personal data on the basis that the processing is necessary for the purposes of the legitimate interest we pursue, on a contractual basis or with the consent of you, as the data subject. In many cases, we will also have to process your personal data on the basis of a legal obligation. In the case of processing on the basis of consent, you always have the option to withdraw your consent.

## 3 Legal basis of processing

3.1 We process personal data on the basis of the following legal bases:

3.1.1 **on the basis of the consent** of the data subject to the processing of their personal consents for a specifically defined purpose:

- a) common personal data of the OK Document Service users for the purpose of sending marketing information (newsletter, information related to the company’s services and products, information about various events, etc.);
- b) common personal data of the data subjects within the scope of the contact form for the purpose of contacting you through the selected communication channel (email, telephone) in connection with information

that you have requested or are interested in (information about products, services, solutions, etc.);

- c) common personal data of the OK Document Service users for the purpose of company promotion (including publishing references provide by our clients and their opinions on cooperation with us);
- d) GPS data of the OK Document Service users, which are collected when signing a document in order to prove the authenticity of the signature in court or criminal proceedings. GPS data collection can be turned off at any time directly in the web browser settings;
- e) email address of the Signatory for the purpose of proving the authenticity of the signature in court proceedings or criminal proceedings.

3.1.2 **on the basis of a contract**, i.e., processing of personal data is performed on a legal basis according to Section 13 (1) (b) of Act No. 18/2018 Coll., on personal data protection, i.e., the processing of personal data is necessary for the performance of the contract:

- a) common personal data of the OK Document Service users within the scope of the registration form (at least name, surname, email address, telephone number), available on the website, in order to fulfil our obligations (providing the OK Document Service) arising from our contractual relationship within the meaning of the [General Terms and Conditions](#).

3.1.3 **on the basis of special regulations**, i.e., the processing of personal data is necessary according to a special regulation or an international treaty by which the Slovak Republic is bound:

- a) invoicing data of the OK Document Service users for the purpose of keeping an accounting agenda (in the case of using the paid version of the OK Document Service in accordance with the valid Price List, available on the website <https://okdokument.sk/>);
- b) correspondence data of the data subjects for the purposes of recording incoming and outgoing mail.

3.1.4 **on the basis of legitimate interests**, i.e., the processing of personal data is necessary for the purpose of the legitimate interests of the Controller or a third party, except in cases where the interests or rights of the data subject requiring the protection of personal data prevail over these interests, especially if the data subject is a child:

- a) common personal information of the OK Document Service users in order to resolve reported issues in the OK Document Service;
- b) business data of the OK Document Service Users for the purpose of establishing contractual cooperation and care for existing users, development of mutual cooperation, organization of workshops, conferences and similar activities related to our products, services or company brand;
- c) data collected automatically on the website – cookies in order to improve the OK Document Service;

- d) online identifiers (or metadata) of the service users: IP address of the device, operating system of the device, type and version of the browser from which you access the functionalities of the OK Document Service in order to prove the authenticity of the signature in the court or criminal proceedings.

<https://policies.google.com/privacy#infos>  
haring

#### 4 Whose personal data are being processed?

4.1 The data subjects whose personal data we process in the position of the Personal Data Controller in the OK Document Service are:

- OK Document Service users;
- visitors on the website <https://okdokument.sk/>;
- applicants for submitting quotes and other business information;
- other persons who contact us on their own initiative by telephone, email or via the contact form available on the website <https://okdokument.sk/> for reasons such as filing a motion or complaint, requesting feedback and providing information and other communication.

4.2 The data subjects whose personal data we process in the position of the Personal Data Processor are:

- The signatories, i.e., persons who do not have a user account set up in the OK Document Service and with whom the OK Document Service users sign documents and whose personal data were provided to us by a service user for the purpose of signing a document they share with the signatory. Signing a document between the Signatory and the OK Document Service user includes creating a document, electronically signing the document with an original personal digital signature, sending the document by e-mail, temporarily saving the document in the OK Document Service.
- The purpose of processing, the legal basis, the scope of processed personal data and the length of storage of processed personal data in this case are specified by the Controller – the OK Document Service user.

#### 4.3 Data from third parties

- Users can use integrated applications of third parties (Google drive) within the OK Dokument service through their User Accounts at the third parties (Google). In this case, the User grants Google their CONSENT to provide your POIs to the following extgent: name, e-mail address, language preference, profile photo of the provider of the <https://okdokument.sk/> (company ANASOFT APR, spol. s r.o.), who, in this case, is in the position of the processor of personal information. While using the applications of third parties you can always choose what the OK Dokument service will have access to.
- You can find more information on providing personal information of third parties directly in the Third Party Privacy Policies:
  - a) Google Ireland Limited (registration number: 368047), located at Gordon House, Barrow Street, Dublin 4, Ireland; the privacy policy of this company is available here:

#### 5 Processing the unique characteristics of an original personal digital signature

5.1 From a technical point of view, in the OK Document Service, which is an electronic document signing service in the online environment, it is possible to collect an indefinite amount of personal data needed to create any type of electronic document with the same legal guarantees as a paper document. The scope of processed personal data, legal basis, purpose and length of storage is determined by the Collector – the OK Document Service user.

5.2 Static and dynamic values of original personal digital signatures (hereinafter referred to as "signature characteristics") are captured during electronic signature of documents. Static values include the position of the pen/finger/mouse within the X and Y axes at a given time. However, the capture of dynamic values such as pressure, speed and acceleration depend solely on the type of equipment used, which allows the capture of these values. After signing the document, the characteristics of the signature are immediately encrypted and inextricably linked to the content of the signed document so that they neither can be subsequently extracted from the document nor change the content thereof. Additional data (time stamp, application version, device type, device production name, DPI of the device display) are attached to the signature characteristics together with metadata within the meaning of point 2.1. f), which ensures that individual data cannot be placed in another document, or that this abuse can be detected.

5.3 The signature characteristics are used exclusively to create an original personal digital signature. It should be noted that an original personal dynamic signature, together with its characteristics, does not serve to identify the signatory or authenticate the signatory in real time. The only situation where access to the original characteristics of an original personal digital signature is implemented is an extraordinary situation, in particular, when proving the authenticity of the signature in court or criminal proceedings through forensic examination. In this case, it is necessary to gain access to the key which was used for encryption of the signature characteristics. Neither the signatory, nor the user of the service or the Service Provider has access to the key, but a third party who is responsible for its storage in accordance with the security regulations and guidelines of the Service Provider. Extracting a signature from a document can only be done in a formal way through forensic examination with the participation of a notary and a forensic expert, and it can be verified either automatically using a software tool comparing signatures with each other or to refer it to a signature expert.

5.4 ANASOFT does not have access to the characteristics of original personal digital signatures or the data processed by the signature analyser by an independent forensic tool designed to verify the authenticity of the signature evaluation and to evaluate the originality of documents signed by the OK Document Service.

#### 6 Will your personal data be transferred to another country?

6.1 In general, your personal data will not be transferred outside the European Economic Area (EEA). We will never transfer your personal data outside the EEA without ensuring security and protection thereof. Therefore, we make sure that all data recipients have signed standard EU contractual clauses to justify the transfer or that the country guarantees adequate protection under the currently applicable data protection legislation.

#### 7 How long will we keep your personal data?

7.1 We only store your personal data for a limited period of time, as long as it is necessary to fulfil the purpose of processing according to special regulations, and the purpose for which they were obtained, if we have a legitimate interest in storing them, e.g., until the termination of the contractual relationship and/or the expiry of the limitation period within which we should be able to defend ourselves against legal claims. The basic time limit for the processing and storage of your personal data is the duration of your contractual relationship with our company in accordance with the [General Terms and Conditions](#), after its termination until the expiry of the deadlines set for the exercise of rights arising from such relationship. Your personal data will be deleted when purposes for the processing thereof expire. The retention period of your personal data varies depending on the legislative requirements governing the specific purpose of the processing. In any case, although it is not possible to determine a specific period of processing in advance, precise criteria for its determination are always laid down so that personal data are not kept longer than necessary. We may process your personal data for a longer period after the termination of the contractual relationship in the event of an ongoing legal dispute or if you have given us consent to store your personal data for a longer period.

7.2 In the case of personal data processing for which consent has been granted, your personal data will be processed, in general, for a period of 5 years or until such consent is revoked.

#### 8 Do we perform automated profiling of people?

8.1 We do not perform automated profiling of the data subjects as part of our personal data processing activities.

## 9 How do we protect your personal data?

9.1 The security of personal data as well as other confidential information that we need in order to provide our solutions, products and services is a high priority for us. We adhere to international safety standards and all our business, production, marketing, management, organizational as well as support procedures are regularly inspected by independent auditors. We hold several certificates confirming the quality and safety of our products and services, as the holder of, for example, a certificate in accordance with the requirements of the information security management standard ISO 27001. We have implemented a set of guidelines, procedures and training courses that apply to personal data protection, maintaining their confidentiality, integrity and availability. We regularly review the adequacy of our organizational and technical security measures, invest in increasing their effectiveness or introducing new tools and measures.

9.2 ANASOFT has technical and organizational measures in place to ensure a high level of security in accordance with the GDPR Regulation, Act No. 18/2018 Coll., on personal data protection, Act No. 69/2018 Coll., on cyber security and ISO 27001, which are regularly reviewed and re-evaluated. These measures shall ensure the confidentiality, integrity, availability and resilience of the systems that process personal data.

9.3 Integrity, i.e., the entirety and inalterability of the content of the signed document guarantees that the information contained in the document (its content) cannot be changed after the signature of the document. The integrity of each document is subsequently, after it has been signed with an original personal digital signature, is guaranteed by the way in which a unique digital signature is inserted with each handwritten signature. Therefore, every digital signature embedded in a PDF document locks the document, so it is not possible for anyone to change the contents of the document after signing it without such change being apparent.

9.4 Personal as well as other sensitive data contained in the OK Document Service are securely stored in the ANASOFT Datacenter and the server itself is protected on several levels. The first is an application firewall with IPS (Intrusion Prevention System), which controls all communication in order to protect the server and data at the network level. The second is an upstream dedicated server, on which all communication is terminated and whose task is to protect data. The third level is regular data backup.

9.5 All data passing through the OK Document Service are secured by an SSL certificate with 256-bit encryption. The signature in the document is encrypted with an asynchronous code. Each handling of PDF documents is recorded in separate persistent logs.

9.6 We regularly perform internal security audits and software updates to ensure the security and reliability of our systems.

## 10 What are your rights?

10.1 In accordance with the currently applicable legislation, you have the right to access, correct, delete or restrict the processing of your personal data, as well as the right to object to our processing. When we process your personal data on the basis of consent, you also have the right to revoke your consent at any time.

10.2 To revoke your consent to the processing of your personal data, send us an e-mail at [gdpr@anasoft.com](mailto:gdpr@anasoft.com).

10.3 You can exercise all your rights by submitting your request to the responsible person by email at [gdpr@anasoft.com](mailto:gdpr@anasoft.com). When handling your request, we are entitled to require you to submit additional identification data for the purpose of one-time verification of the identity of the person submitting the request. In processing your request in accordance with the rights of data subjects, we will also take into account our provable legitimate reasons for personal data processing or for proving, asserting or defending legal claims.

10.4 In the event that we process your personal data in the role of the Processor, we recommend that you direct your suggestions and requests primarily to the Personal Data Collector (the OK Document Service user), as we are not always authorized to process such requests from data subjects without their knowledge.

## 11 To whom and on what basis do we provide or make available your personal data?

11.1 Our authorized employees will have access to your data. In such case, access shall only be granted if it is necessary for the above purposes and only if the staff member is bound by the obligation of keeping professional secrecy.

11.2 We will only provide your personal data to other parties if this is directly required by law or you have granted us your express consent. We may also provide personal data to our suppliers on the basis of a mutual contractual relationship and business terms and conditions. They commit our suppliers to adhere to security mechanisms for the protection of personal data and to observe at least the same level of security standards regarding confidentiality, integrity and availability of data so as not to reduce the level of security protection provided by security guarantees we guarantee. We do not transfer personal data to any third countries.

11.3 If required by law or court order, we may share your personal data with, for example, our suppliers or clients, tax authorities, social security authorities, law enforcement agencies or other public authorities.

11.4 ANASOFT does not have data on payment cards with which you make payments in the OK Document Service. Data on your payment cards are only available to the secured payment gateway and the relevant banking institution.

## 12 Privacy of Children

12.1 Our OK Document Service is not designed and intended for use by persons under the age of 18 (hereinafter referred to as “Minors”). We do not knowingly collect or request information from Minors, nor do we knowingly allow them to use our OK Document Service. If you are a Minor, please, neither use our services nor send us your personal data. If we become aware that personal data of Minors are being processed without the verified consent of their parents, such data will be deleted immediately. If you believe that we may have data concerning a Minor, please, contact us using the contact details provided in point 14 of this Privacy Policy.

## 13 Changes to the Privacy Policy

13.1 This Privacy Policy is based on the currently applicable legislation in both the EU and the Slovak Republic. Specifically, these are Regulation (EU) 2016/679 of the European Parliament and of the Council and Act No. 18/2018 Coll., on personal data protection and on amendments to certain other laws. We will regularly review whether this Privacy Policy are up to date in order to maintain the transparency of communication with the data subjects.

## 14 How can you contact us?

14.1 If you have any questions regarding the processing of your personal data, or if you want to know more about how and why we process your personal data, or if you have any questions regarding the exercise of your rights, please contact our data protection officers with one of the following ways:

a) In paper form to the address of the company's registered office:

ANASOFT APR, spol. s r.o.  
Data Protection Officer  
Mlynská dolina 41  
811 02 Bratislava  
Slovak Republic

b) By e-mail: [gdpr@anasoft.com](mailto:gdpr@anasoft.com)

c) By phone: +421 2 3223 4111

14.2 We will deal with any complaints and requests we receive and respond to them within 30 days.

14.3 If you are not satisfied with our response, or if you believe that we are processing your personal data unfairly or illegally, you can contact the Supervisory Authority. For more information on the Supervisory Authority of the Slovak Republic and the application procedure,

see [www.dataprotection.gov.sk](http://www.dataprotection.gov.sk).

## 15 Final Provisions

15.1 This Privacy Policy is effective from 6 July 2022.