

PRIVACY POLICY CRYPTON DIGITAL, SE

This Privacy Policy (hereinafter referred to as the "**Policy**") contains the information about the processing of your personal data by **CRYPTON DIGITAL, SE**, with registered office at Staré Grunty 18, 841 04 Bratislava, Reg. No.: 51 051 435, registered in the Commercial Register of the Bratislava I District Court, Section: Po, Insert No.: 4211/B (hereinafter referred to as the "**Controller**"), which occurs on the internet sites <https://crypton.digital> and <https://hodlx.digital>, on the Controller's profiles on social networks and during the provision of services and the organisation of events by the Controller.

By means of the Policy, the Controller provides you with the information about why your personal data are processed, how your personal data are processed, how long the Controller retains them, what are your rights in connection with the processing of your personal data and other relevant information about the processing of your personal data. By means of the Policy, the Controller fulfils its information obligation in relation to all data subjects in the case if the Controller acquired personal data directly from you as a data subject, and also in case if the Controller acquired your personal data from another source.

The Controller processes your personal data in compliance with Regulation 2016/679 of the European Parliament and of the Council on the Protection of Individuals with Regard to the Processing of Personal Data and on the Free Movement of Such Data, repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter referred to as the "**Regulation**"), with Act No. 18/2018 Coll., on the Protection of Personal Data and on Amendment to Certain Acts (hereinafter referred to as the "**Act**"), or with other regulations on personal data protection (hereinafter referred to as the "**Regulations on Personal Data Protection**").

Protection of your personal data is one of our priorities. Therefore, we transparently inform you about the processing of personal data in this document, as well as about **your rights**, which you, as a data subject, may exercise towards the Controller. Simultaneously, this Document includes the information about specific purposes of the processing of personal data, about which of your personal data or which types of personal data we process, on what legal basis, to whom we provide your personal data, etc.

In the matters relating to the processing and protection of personal data, you can contact the Controller at the address **CRYPTON DIGITAL, SE**, Staré Grunty 18, 841 04 Bratislava or via email at the email address dpo@crypton.digital. The Controller has not appointed a responsible person in the field of the processing and protection of personal data.

1. CATEGORIES OF PERSONAL DATA

The Controller processes your personal data **in compliance with the principle of minimisation** so that it can perform concluded contracts, fulfil legal obligations, process personal data for the processing of which the Controller has a legitimate interest, or process your personal data for the processing of which you have granted the Controller your consent. The Controller processes personal data always to the extent that enables it to fulfil the defined purpose of the processing. This means that the Controller does not request from you personal data that are not necessary for the specific purpose of the processing.

Specific categories of personal data which the Controller processes in relation to you with regard to individual purposes of the processing are specified below, in a table of purposes.

2. SOURCE OF PERSONAL DATA

The Controller acquires your personal data directly from you, as a data subject, when you yourself provide it with your data (e.g. when concluding a contract – during registration on the Controller’s websites, during your identification and its verification in compliance with regulations on protection against money laundering, or when visiting the Controller’s website). **In some cases, especially if a company or other entity of which you are a representative or a contract person concludes a contract with the Controller, then such an entity is** a source of your personal data.

3. PURPOSES, LEGAL BASES OF THE PROCESSING AND RETENTION PERIOD

The Controller processes your personal data only for justified purposes, for a limited period of time, using the maximum possible level of security. **The Controller processes personal data only if there is a legal basis for the processing, i.e. they are processed in compliance with the principle of legality.** The Controller retains personal data always in compliance with the principle of minimisation. That means that the Controller processes personal data only during a time period during which it is necessary to retain personal data. After such period expires, the Controller will delete personal data, unless legal regulations stipulate otherwise.

You can find specific purposes of the processing, legal bases and retention period of your personal data, depending on the specific purpose of the processing, **in the following table.** The Controller will also provide you with further information about the retention period of your personal data, if you so request.

Purposes	Legal basis	Categories of personal data	Categories of data subjects	Retention period
The processing of accounting documents	Article 6(1)(c) of the Regulation – the processing of personal data means performance during the fulfilment of legal obligations (Act No. 431/2002 Coll., on Accounting, as amended, Act No. 595/2003 Coll., on Income Tax, as amended, Act No. 222/2004 Coll., on Value Added Tax, as amended)	natural persons – suppliers of goods and services and their representatives, agents, employees and representatives of suppliers of goods and services, natural persons – clients and their representatives	common personal data necessary for the fulfilment of legal obligations (name, surname, residence address/place of business, service delivery address, contact details – tel. number, email address, bank details)	10 years following the year which they relate to
Conclusion of contracts and fulfilment of contractual obligations of the Controller under contracts concluded with suppliers of goods and services	Article 6(1)(b) of the Regulation – the processing of personal data is carried out during the fulfilment of the contractual obligations	natural persons – business partners and their representatives, natural persons – suppliers of services and their representatives, natural persons – representatives of business partners (LP)	common personal data (especially name, surname, place of business address, billing address, telephone number, email)	during contractual relationship and after it ends until the full settlement of legal and other claims arising from the concluded contracts

<p>The conclusion of contracts and the fulfilment of contractual obligations of the Controller under contracts concluded with registered clients – clients on the Controller’s websites crypton.digital and hodlx.digital (including pre-contractual relationships) – of contracts on the provision of various services in the field of cryptocurrencies</p>	<p>Article 6(1)(b) of the Regulation – the processing of personal data is carried out during the fulfilment of the contractual obligations</p>	<p>natural persons – clients and their representatives</p>	<p>common personal data necessary for the conclusion of a contract – registrations: name, surname, email address, country of origin, password, other payment data: payment data, data on the virtual wallet, data on the history of purchases, data on the amount and structure of the portfolio of the registered user – customer</p>	<p>during contractual relationship and after it ends until the full settlement of legal and other claims arising from the concluded contracts</p>
<p>Keeping accounts of registered users – clients on the Controller’s websites crypton.digital and hodlx.digital</p>	<p>Article 6(1)(b) of the Regulation – the processing of personal data is carried out during the fulfilment of the contractual obligations</p>	<p>natural persons – clients and their representatives</p>	<p>common personal data necessary for the conclusion of a contract – registrations: name, surname, email address, country of origin, password, other payment data: payment data, data on the virtual wallet, data on the history of purchases, data on the amount and structure of the portfolio of the registered user – customer</p>	<p>for the duration of an active account and 15 months after the last login or until the full settlement of legal and other claims arising from a concluded contract</p>

<p>Conclusion and performance of marketer contracts concluded on the website crypton.digital</p>	<p>Article 6(1)(b) of the Regulation – the processing of personal data is carried out during the fulfilment of the contractual obligations</p>	<p>natural persons – clients and their representatives</p>	<p>common personal data necessary for the conclusion of a contract – registrations: name, surname, email address, country of origin, password, other payment data: payment data, data on the virtual wallet, data on the history of purchases, data on the amount and structure of the portfolio of the registered user – customer, data on the marketer network – affiliate</p>	<p>during contractual relationship and after it ends until the full settlement of legal and other claims arising from the concluded contracts</p>
<p>Fulfilment of legal obligations connected with the conclusion of a distance contract</p>	<p>Article 6(1)(c) of the Regulation – the processing of personal data is carried out during the fulfilment of legal obligations (Act No. 102/2014 Coll., on the Protection of Consumers in Respect of the Sale of Goods or the Provision of Services under a Distance or Off-premises Contract and on Amendment to Certain Acts)</p>	<p>natural persons – clients (consumers) and their representatives</p>	<p>common personal data</p>	<p>for the duration of a distance contract and until the full settlement of legal and other claims arising from the distance contract</p>
<p>The provision of free educational services by means of on-line webinars</p>	<p>Article 6(1)(b) of the Regulation – the processing of personal data is carried out during the fulfilment of the contractual obligations</p>	<p>natural persons – clients</p>	<p>email address, name, surname</p>	<p>for the duration of a distance contract and until the full settlement of legal and other claims arising from the distance contract</p>

<p>The registration of suppliers, other business partners and clients and their contact persons (in the case of business partners or clients–legal persons), concluded contracts and conducting appropriate communication</p>	<p>Article 6(1)(f) of the Regulation – the processing of personal data is carried out on the basis of the Controller’s legitimate interest, which is the need to keep an overview of suppliers, business partners and clients of the Controller, or their contact person within contractual relationships for the proper fulfilment of legal obligations, possible establishment of legal claims and the keeping of appropriate contractual communication</p>	<p>natural persons – suppliers of goods and services, their employees and representatives, agents, natural persons – clients and representatives</p>	<p>common personal data (name, surname, business name, residence address/place of business, contact details – telephone number, email address, organisation affiliation)</p>	<p>5 years after the end of a contractual relationship</p>
<p>The handling of complaints and the keeping of prescribed documentation in the field of complaints</p>	<p>Article 6(1)(c) of the Regulation – the processing of personal data is carried out during the fulfilment of legal obligations (Act No. 250/2007 Coll., on the Protection of Consumer and on Amendment to Act of the Slovak National Council No. 372/1990 Coll., on Misdemeanours, as amended, Act No. 40/1964 Coll., the Civil Code, as amended)</p>	<p>natural persons making a complaint (clients, their employees and representatives)</p>	<p>common personal data</p>	<p>3 years from the date of the making of a complaint, if the complaint is made by a client–natural person, and 4 years from the date of the making of a complaint if the complaint is made by a client–legal person</p>

<p>The fulfilment of duties when taking care of a client and when identifying an unusual business transaction relating to payment transactions (identification of a client and business transaction, including the making copies of and scanning official documents and the storage of data) – identification of a client in order to carry out on-line transactions and to fulfil other duties in the field of protection against money laundering as a liable person (KYC)</p>	<p>Article 6(1)(c) of the Regulation – the processing of personal data is carried out during the fulfilment of legal obligations (Act No. 297/2008 Coll., on Protection Against Money Laundering and Terrorist Financing and on Amendment to Certain Acts, as amended, Act No. 492/2009 Coll., on Payment Services and on Amendment to Certain Acts, as amended)</p>	<p>natural persons – clients and their representatives, clients' beneficial owners</p>	<p>name, surname, date of birth, birth number, address of permanent or other residence, nationality, type and number of identity document, other personal data proving the position of a beneficial owner or the function of a data subject of the client</p>	<p>5 years from the end of a contractual relationship with a client, unless a financial intelligence unit asks for a longer retention period in writing (not more than next 5 years) in compliance with § 19 of Act No. 297/2008 Coll., on Protection Against Money Laundering and Terrorist Financing and on Amendment to Certain Acts, as amended</p>
<p>Storage of any written documents and data related to a transaction carried out within business activities as a liable person in the field of AML (when carrying out payment transactions)</p>	<p>Article 6(1)(c) of the Regulation – the processing of personal data is carried out during the fulfilment of legal obligations (Act No. 297/2008 Coll., on Protection Against Money Laundering and Terrorist Financing and on Amendment to Certain Acts, as amended)</p>	<p>natural persons – clients and their representatives, clients' beneficial owners</p>	<p>name, surname, date of birth, birth number, address of permanent or other residence, nationality, type and number of identity document, other personal data stated in transaction documents</p>	<p>5 years from the execution of a transaction, unless a financial intelligence unit asks for a longer retention period in writing (not more than next 5 years) in compliance with § 19 of Act No. 297/2008 Coll., on Protection Against Money Laundering and Terrorist Financing and on Amendment to Certain Acts, as amended</p>
<p>The handling of data subjects' exercised rights</p>	<p>Article 6(1)(c) of the Regulation – the processing of personal data is carried out during the fulfilment of legal obligations (Act No. 18/2018 Coll., on the Protection of Personal Data and on Amendment to Certain Acts)</p>	<p>natural persons who submitted a request or who exercised the rights of data subjects towards the Controller</p>	<p>common personal data, which constitute part of the request</p>	<p>until the settlement of the rights exercised</p>

<p>Registration of data subjects' exercised rights</p>	<p>Article 6(1)(f) of the Regulation – the processing of personal data is carried out on the basis of the Controller's legitimate interest, which is the registration of data subjects' exercised rights due to the proving of the fulfilment of duties arising from legal regulations</p>	<p>natural persons who submitted a request or who exercised the rights of data subjects towards the Controller</p>	<p>common personal data, which constitute part of the request</p>	<p>5 years from the day on which the rights were exercised</p>
<p>The sending of information and news about current affairs from the world of cryptocurrencies and about the Controller's services (newsletter) – direct marketing</p>	<p>Article 6(1)(a) of the Regulation – the processing of personal data is carried out on the basis of a data subject's consent</p>	<p>natural persons who have subscribed to the newsletter</p>	<p>name, surname, email address</p>	<p>3 years from the granting of consent or until withdrawal of consent, depending on which situation will occur sooner</p>
<p>The sending of information and news about current affairs from the world of cryptocurrencies and about the Controller's services (direct marketing towards existing and former clients)</p>	<p>Article 6(1)(f) of the Regulation – the processing is carried out on the basis of the Controller's legitimate interest, which is the interest in maintaining the existing clients and informing them about the Controller's current services</p>	<p>natural persons – clients and representatives of clients and entities, to whom the Controller provided its services in the past</p>	<p>name, surname, function in a client's company, email address</p>	<p>3 years from the day of the provision of services or until the cancellation of subscription, depending on which situation will occur sooner</p>

<p>Responding to messages and the handling of enquiries/requests from messages delivered to the Controller by means of contact forms on the website, profiles on social networks, via email or by phone</p>	<p>Article 6(1)(f) of the Regulation – the processing of personal data is carried out on the basis of the Controller’s legitimate interest, which consists in responding to messages on social networks and messages received in other form in order to properly conduct business communication, to improve quality of the services provided, and to acquire new clients</p>	<p>natural persons sending a message/an enquiry</p>	<p>email address, other data stated in the message</p>	<p>30 days from the delivery of a request or until a request has been processed (fulfilment of purpose), depending on which situation will occur sooner</p>
<p>Publication of clients’ references about their satisfaction with the Controller’s services on the website</p>	<p>Article 6(1)(a) of the Regulation – the processing of personal data is carried out on the basis of a data subject’s consent</p>	<p>natural persons – clients who have granted their consent</p>	<p>name, photograph, age, occupation</p>	<p>3 years following the granting of consent or until it is withdrawn, depending on which situation will occur sooner</p>
<p>Taking photographs of a data subject and their publication, together with the name, surname, function and contact details of the data subject on the Controller’s website, on business partners’ websites, and on the Controller’s profile on social networks</p>	<p>Article 6(1)(a) of the Regulation – the processing of personal data is carried out on the basis of a data subject’s consent</p>	<p>natural persons who have granted their consent</p>	<p>name, surname, function of data subject, contact details, photograph</p>	<p>3 years from the day on which consent was granted, or until its withdrawal, depending on which situation will occur sooner</p>
<p>Making audiovisual recordings of a data subject and their publishing, together with the name, surname, function and contact details of the data subject, on the Controller’s website, on business partners’ websites, and on the Controller’s profile on social networks</p>	<p>Article 6(1)(a) of the Regulation – the processing of personal data is carried out on the basis of a data subject’s consent</p>	<p>natural persons who have granted their consent</p>	<p>name, surname, function, audiovisual recording of a data subject</p>	<p>3 years from the day on which consent was granted, or until its withdrawal, depending on which situation will occur sooner</p>

Organising competitions for the public and the publication of winners on the Controller's website and profiles on social networks	Article 6(1)(a) of the Regulation – the processing of personal data is carried out on the basis of a data subject's consent	natural persons who participated in the competition	name, surname, residential address	2 years from the granting of consent or until its withdrawal, depending on which situation will occur sooner
Measuring website traffic and the targeting of the Controller's advertisement by means of using cookies	Article 6(1)(a) of the Regulation – the processing of personal data is carried out on the basis of a data subject's consent	natural persons – website visitors who have granted their consents	common personal data	not more than 2 years following the year which they relate to

In connection with the security of personal data, the Controller has adopted a relevant internal documentation, which specifies adequate safety measures adopted by the Controller in order to secure your personal data (especially physical, technical and organisational security measures, e.g. directories and databases protected by password or using SSL technology for encryption).

4. JOINT CONTROLLERS

As for purposes of the processing of your personal data ***"Fulfilment of duties when taking care of a client and when identifying an unusual business transaction (identification of a client and a business transaction, including making copies of and scanning official documents and the storage of data) – identification of a client in order to carry out on-line transactions and fulfilment of other duties in the field of protection against money laundering as a liable person (KYC)"***, the means and purposes of the processing of personal data of data subjects are, besides the Controller, also determined by UPDN ONE s.r.o., with registered office at Bohdalecká 1420/6, Michle, 101 00 Prague 10, the Czech Republic, Reg. No.: 026 54 962 which, when processing personal data for the above-mentioned purpose, processes personal data of data subjects in the position of joint controllers together with the Controller (hereinafter referred to as the ***"Joint Controllers"***).

The Joint Controllers have determined their mutual responsibilities for the fulfilment of duties pursuant to the Regulations on Personal Data Protection in an agreement of the Joint Controllers concluded pursuant to Article 26 of the Regulation, under which:

- the Controller fulfils duties of a contact point for data subjects in connection with the processing of personal data,
- the Controller fulfils duties to provide data subjects with the information stated in Articles 13 and 14 of the Regulation,
- the Controller fulfils duties and tasks relating to the exercise of the rights of data subjects, using the procedure stated in Article 6 of the Privacy Policy.

Regardless of the above-mentioned parts of the agreement of the Joint Controllers, each data subject is entitled to exercise his/her rights pursuant to the Regulations on Personal Data Protection in relation to each of the Joint Controllers and towards each of the Joint Controllers.

5. DOES THE CONTROLLER USE PROFILING AND AUTOMATED DECISION-MAKING?

When processing your personal data, the Controller does not use profiling and it does not process personal data in any form of automated individual decision-making, in relation to which your personal aspects would be evaluated.

6. RECIPIENTS

Your personal data may be provided to recipients – government authorities, courts, law enforcement authorities, supervisory bodies in the field of protection against money laundering, in the field of consumer protection or in the field of payment services which, in certain cases, are entitled to process your personal data.

In some cases, we also provide your personal data to other entities, especially third parties, which is in compliance with the previous article, joint controller, UPDN ONE s.r.o. and our intermediary, with whom we have concluded contracts of authorisation to process personal data, and we keep a transparent list of all our intermediaries. Our intermediaries include: **companies providing web development services, companies providing administration of websites** (including hosting services and advertising and marketing services), **a company providing newsletter services, a company providing bookkeeping services** and **our sales representatives** (natural persons – entrepreneurs) **within the Affiliate Program on the website.**

When processing your personal data, we exclusively make use of the intermediaries, who have adopted adequate technical and security measures, by means of which the requirements of the Regulations on Personal Data Processing for the secure processing of your personal data have been met.

Recipients of your personal data are also operators of social networks and communication media – Facebook, INSTAGRAM, Twitter, LinkedIn and YouTube – if you contact the Controller by means of a message on one of the above-mentioned social network or if you grant the Controller consent to publish your personal data on these social networks and communication channels.

7. TRANSFER TO THIRD COUNTRIES AND INTERNATIONAL ORGANISATIONS

When your personal data are processed by the Controller, in some cases your personal data are transferred to third countries:

- if you subscribe to a newsletter or if a client newsletter is sent to you, your personal data are transferred to the USA, SendGrid Company, which is an operator of the service that the Controller uses for the distribution of newsletters,
- if you grant consent to the storing of analytical and marketing cookies, your personal data will be transferred to the USA, to Google LLC and Facebook, Inc., which the Controller uses to measure traffic and activity on the Controller's website,
- if you contact the Controller by means of a message on social networks or if you grant the Controller consent to publish your personal data on social networks or other communication channels (Facebook, INSTAGRAM, Twitter, LinkedIn and YouTube), your personal data will be transferred to the USA, to Facebook Inc., Google, LLC, Twitter, Inc., LinkedIn Corporation, which are operators of the above-mentioned social networks and communication channels.

Transfer of your personal data is in all the above-mentioned cases secured by means of standard contractual clauses which are – in compliance with the terms and conditions of the use of the above-mentioned services – part of contracts of authorisation to process personal data concluded with the above-mentioned entities.

8. WHAT ARE YOUR RIGHTS IN CONNECTION WITH THE PROCESSING OF PERSONAL DATA?

In connection with the processing of your personal data, you, as a data subject, have the following rights:

Your right	Description
<p>Right of access – As a data subject you are entitled to acquire from the Controller a confirmation of whether the Controller processes your personal data, and if it does so, you are entitled to access to the personal data and the information pursuant to Article 15 of the Regulation. The Controller will provide you with a copy of personal data which the Controller processes. If you submit a request via electronic means, the Controller will provide you with the information in a commonly used electronic form, unless you ask for a different form.</p>	<p>Right to erasure (“right to be forgotten”) – You also have the right to ask the Controller to erase your personal data without undue delay, if some terms and conditions are met, for instance, if personal data are not necessary for the purposes for which the Controller has acquired them or processed them. This right of yours, however, must be considered individually, since there can be a situation when other circumstances prevent the Controller from erasing the personal data (for instance, the Controller’s legal obligation). This means that in such a case, the Controller will not be able to comply with your request to erase personal data.</p>
<p>Right to rectification – In order to ensure the accuracy, completeness and timeliness of your personal data, the Controller has adopted adequate measures. As a data subject, you have the right to ask the Controller to rectify, without undue delay, your incorrect personal data or to supplement your incomplete personal data.</p>	<p>Right to restriction of processing – You also have the right to ask the Controller to restrict the processing of your personal data. This will be the case, for example, if you challenge the accuracy of personal data or if the processing is illegal and you ask for the restriction of the processing, or if the Controller does not need your personal data for the purposes of the processing, but you need the data to demonstrate, exercise or defend legal claims. The Controller will restrict the processing of your personal data if you ask for it.</p>

<p>Right to transferability of data – Under certain circumstances you have the right to transfer personal data to another controller whom you will choose. The right to transferability, however, applies only to personal data processed by the Controller on the basis of consent that you have granted to the Controller under a contract of which you are one of contracting parties, or if the Controller processes personal data using automated means.</p>	<p>RIGHT TO OBJECT – You have the right to object to the processing of personal data, for instance, if the Controller processes your personal data on the basis of a legitimate interest or in relation to the processing within which profiling is used. If you object to such processing of personal data, the Controller will not process your personal data any longer, unless the Controller demonstrates compelling legitimate grounds for the further processing of your personal data.</p>
<p>RIGHT TO WITHDRAW CONSENT – If the Controller processes your personal data on the basis of your consent, you have the right to withdraw the consent granted any time in the same way you granted it. The withdrawal of consent is without prejudice to the lawfulness of processing carried out before the consent was granted.</p>	<p>Right to lodge a complaint or an initiative – If you think that your personal data are processed contrary to the applicable legal regulations, you can submit your complaint to a supervisory body, which is the Office for Personal Data Protection of the Slovak Republic, with its registered office at Hraničná 12, 820 07 Bratislava 27; website: dataprotection.gov.sk, tel. number: 02 3231 3214; email: statny.dozor@pdp.gov.sk.</p>

You may exercise your rights stated in the previous point of the Policy using the Controller's contact details stated in the introduction of the Policy.

The Controller will respond to the exercise of your rights free-of-charge. In the case of a repeated, an unfounded or inadequate request for the exercise of your rights, the Controller will be entitled to charge a reasonable fee for providing the information. The Controller will provide you with response within 1 month from the day on which you exercised your rights. In certain cases, the Controller is entitled to extend this period, namely in the case of a high number and complexity of requests of data subjects, however by a maximum of 2 months. The Controller will always inform you about the extension of the period.

9. SOCIAL MEDIA AND LINKS TO OTHER WEBSITES

Within the framework of supporting marketing and advertising, you will find on the Controller's website links to various social networks, such as Facebook, INSTAGRAM, Twitter, LinkedIn or other on-line communication channels, such as YouTube. The Controller hereby takes the liberty to notify you that after clicking on the add-on on the website, and after switching to a social network or a communication channel, the privacy policy of the controller of the social network or the communication channel will start to apply, with the exception of cases when you contact the Controller by means of a message on the social network (in such case, the processing of your personal data is also governed by the Privacy Policy and your personal data processed by the Controller in compliance with the above-mentioned information).

Further information about the processing of your personal data by the operators of social networks can be found at the following links: (i) Facebook: <https://sk-sk.facebook.com/policy.php>, (ii) Instagram: <https://sk-sk.facebook.com/help/instagram/155833707900388/>, (iii) LinkedIn: <https://www.linkedin.com/legal/privacy-policy> (iv) Twitter: <https://twitter.com/en/privacy>, and (v) YouTube: <https://policies.google.com/technologies/product-privacy?hl=sk>.

10. VALIDITY

The Policy is valid and effective from 08 June 2020.

The last update of the Policy took place on 01 November 2020.

With regard to the fact that an update of the information about the processing of personal data contained in the Policy may be required in the future, the Controller is entitled to update the Policy any time. In such a case, the Controller will inform you about this update in an appropriate manner.