

ASSESSMENT OF LEGITIMATE INTEREST

In relation to 'other personal data stored by the system' contained in the Data Controlling Policy.

Legal basis to this data processing is the legitimate interests pursued by the controller. The Company performed the assessment in relation to his as follows.

1. Identification of legitimate interest on behalf of Data Controller

1.1 Purpose of data processing

To secure the ability of the information system to resist malicious actions that compromise the availability, authenticity, integrity and confidentiality of stored or transmitted personal data, and the security of the related services offered by.

1.2. Presentation of legitimate interest

It is a legitimate interest of the Company to store the personal data of webpage visitors such as online identifier IP address and data created during browsing (date of login) in order to prevent malicious actions and secure the related services offered by.

Result:

Based on the above, the interest to process the above data is legal, clear and valid, therefore this is a legitimate interest.

2. Inspection of necessity and proportionality

2.1. Why is the data processing needed to achieve the purpose?

The above purpose can only be achieved by storing and atomized analysis of certain personal data of webpage visitors.

2.2 Are there any alternative means to achieve the purpose?

The Company has no alternative option or solution to achieve the above purpose without data processing.

2.3. What kind of adverse effects will have on the Company if the data processing is not going to happen?

If the Company does not process the above data there is a possibility that the website and the related services will become unavailable, therefore the company will not be able to provide online services.

Result:

Based on the above, the data processing is needed to achieve the above purpose.

3. Identification of interests and rights of the data subjects

3.1. Relationship with data subjects

The relationship between the data subjects and the Company can be various: data subjects can be already in contractual relationship, or wish to enter a contractual relationship or just seeking for information.

3.2. Rational expectations, fundamental rights and freedom of the data subjects

It is a rational expectation from data subjects, not to enable direct interconnection of online identifiers (IP address) with other personal data of data subjects such as name and address and that the automatic storing and analysis of online identifiers are only taking place in order to ensure the secure operation of the webpage.

3.3. Favorable and adverse effects of data processing on data subjects

The data processing solely itself has no adverse effect on the data subject, the data subject does not perceives the data processing and has no legal effect on it.

Result:

The company has identified and assessed the interests and rights of data subjects.

4. Result of the assessment of legitimate interest

4.1. Existence of legitimate interest

It is an undoubted interest of the Company to ensure the continuity of service, to detect external malicious actions in time, and to react by taking appropriate action.

4.2. The necessity of data processing

It is essential to process personal data in order to achieve the purpose.

4.3. Proportionality

In some cases, the data subject's right to informational self-determination can be restricted to a proportional and necessary extent. It is the interest of the Company to process personal data of

data subjects (as stated in Data Controlling Policy) in order to achieve a purpose of securely operating the system. Taking into account that the personal data is processed only to achieve a purpose and only for a duration needed in order to achieve this purpose, only a limited accessibility is enabled. The company stores the data safely, and took into consideration the interests, rights and rational expectations of the data subjects, and therefore the restriction of the informational self-determination of the data subject is proportionate to achieve the purpose.

Summary:

As a result of the assessment it can be concluded that the data processing creates no unnecessary or disproportional restriction on the interests, fundamental rights or freedom of the data subject. The data subject learns the rights and the circumstances of data processing at the beginning of the data processing. It is possible for the data subject to object against the data processing.

Taking the above into consideration it can be also concluded that the data processing is necessary and proportional and means no unjustified intervention to the personal sphere. The legitimate interest pursued by the Controller is the legal basis to data processing in respect of above points.