



Privacy Policy

Welcome to www.csb50.me. Data protection and data security when using my website are very important to us. We would therefore like to inform you which of your Personal Data we collect when you visit my website and for what purposes it is used.

Who is responsible?

The person responsible in the sense of Malta's Data Protection Act 2018 (Chapter 586 of the Laws of Malta) ("DPA") and the EU's General Data Protection Regulation ("GDPR") is Vortex99, Fabian Csaba, of Southend Apartments A/2, Triq Ta' Gidwet Marsaskala MSK 3619 Malta and the terms "we", "us", or "our" refer to me and the third parties acting on my behalf. Please direct any questions you may have to me using f@csb50.me.

Principles of data processing

a) Personal data

Personal data is any information relating to an identified or identifiable natural person. This includes, for example, information such as your name, age, address, telephone number, date of birth, e-mail address, IP address or user behavior.

b) Processing

The processing of Personal Data (e.g. collection, retrieval, use, storage or transmission) always requires a legal basis.

c) Legal basis

In accordance with the DPA and the GDPR, we have to have at least one of the following legal bases to process your Personal Data: i) you have given your consent, ii) the data is necessary for the fulfillment of a contract / pre-contractual measures, iii) the data is necessary for the fulfillment of a legal obligation, or iv) the data is necessary to protect our legitimate interests, provided that your interests are not overridden.

d) Retention

Processed Personal Data will be deleted as soon as the purpose of the processing has been achieved and there are no longer any legally required retention obligations.

Data we collect

a) Provision and use of the website

When you call up and use my website, we collect the Personal Data that your browser automatically transmits to our server. This is technically necessary for us to display my website and to ensure its stability and security. In this sense, we collect the following data: i) IP address of the requesting computer, ii) Date and time of access, iii) name and URL of the file accessed, iv) website from which the access was made (referrer URL), v) browser used and, if applicable, the operating system of your computer as well as the name of your access provider. The legal basis is our legitimate interest.

b) Hosting

The hosting service used by us for the purpose of operating my website is [Netlify, Inc.](https://www.netlify.com/) In doing so Netlify processes inventory data, contact data, content data, usage data, meta data and communication data of interested parties and visitors of my website and services, on the basis of our legitimate interests.

c) Invoicing & payment processing

We use [Stripe Payments Europe, Limited](https://stripe.com/) to process payments and invoices. In doing so Stripe may Process Payment Account Details, bank account details, billing/shipping address, name, date/time/amount of transaction, device ID, email address, IP address/location, order ID, payment card details, tax ID/status, unique customer identifier, identity information including government issued documents (e.g., national IDs, driver's licenses and passports). Where applicable, Stripe may Process facial recognition data.



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d) Contacting me

We offer you the opportunity to contact me using various methods. We collect the data you submit such as your name, email address, telephone number and your message in order to process your enquiry and respond to you. The legal basis is both your consent and contract.

e) When using my services

We process the Personal Data involved in your use of our services in order to be able to provide my contractual services. This includes in particular support, correspondence with you, invoicing, fulfillment of my contractual, accounting and tax obligations. Accordingly, the data is processed on the basis of fulfilling our contractual obligations and our legal obligations.

f) Administration, financial accounting, office organization, contact management

We process data in the context of administrative tasks as well as organization of my business, and compliance with legal obligations, such as archiving. In this regard, we process the same data that we process in the course of providing my contractual services. The processing bases are our legal obligations and our legitimate interest.

g) Promotional use of your data

We use your data within the legally permissible scope for marketing purposes, e.g., to draw your attention to special promotions and discount offers. In addition, we may draw your attention to comparable offers by email, e.g., we may inform you about exclusive sales, promotions, or special events. This represents a legitimate interest.

Social Media

a) General

I'm present on social media on the basis of my legitimate interest. If you contact or connect with me via social media, the relevant social media platform and I are jointly responsible for the processing of your data and enter into a so-called joint controller agreement.

b) Market research and advertising

In addition, your data may be processed for market research and advertising purposes. For example, usage profiles can be created from your usage behavior and the resulting interests. This allows, for example, advertisements to be placed within and outside the platforms that presumably correspond to your interests. You can find more information about our advertising on social media in our Cookie Policy.

c) When you visit our profiles and interact with us and others

When you visit our social media profiles, we, as the operator of the profile, process your actions and interactions with our profile (e.g., the content of your messages, enquiries, posts or comments that you send to us or leave on our profile or when you like or share our posts) as well as your publicly viewable profile data (e.g., your name and profile picture). Which Personal Data from your profile is publicly viewable depends on your profile settings, which you can adjust yourself in the settings of your social media account.

Data Security

We undertake to protect your privacy and to treat your Personal Data confidentiality. In order to prevent manipulation or loss or misuse of your data stored with us, we take extensive technical and organizational security precautions which are regularly reviewed and adapted to technological progress. These include, among other things, the use of recognised encryption procedures (SSL or TLS).^[1]_{SEP}

However, we would like to point out that, due to the structure of the Internet, it is possible that the rules of data protection and the above-mentioned security measures are not observed by other persons or institutions that are not in our area of responsibility. We have no technical influence on this. It is the



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user's responsibility to protect the data he or she provides against misuse by encrypting it or in any other way.

International transfers

We may transfer your Personal Data to other companies as necessary for the purposes described in this Privacy Policy. In order to provide adequate protection for your Personal Data when it is transferred, we have contractual arrangements regarding such transfers. We take all reasonable technical and organizational measures to protect the Personal Data we transfer.

How we may share your Personal Data

We may share your Personal Data with our Business Partners for the purposes described in this Privacy Policy, including (but not limited to) conducting the services you request, or customizing my services to better meet your needs. We share your Personal Data only with Business Partners who agree to protect and use your Personal Data solely for the purposes specified by us.

We may also disclose your Personal Data for any purpose with your consent or for law enforcement, fraud prevention or other legal actions as required by law or regulation, or if we reasonably believe that we must protect us, our customers or other business interests. Except as described above of which you will be informed in advance, we will not disclose your Personal Data.

What we do not do

- We do not request Personal Data from minors and children;
- We do not use Automated decision-making including profiling; and
- We do not sell your Personal Data.

Privacy rights

Under the DPA and the GDPR, you can exercise the following rights:

- *Right to information*
- *Right to rectification*
- *Right to deletion*
- *Right to data portability*
- *Right of objection*
- *Right to withdraw consent*
- *Right to complain to a supervisory authority*
- *Right not to be subject to a decision based solely on automated processing.*

If you have any questions about the nature of the Personal Data we hold about you, or if you wish to exercise any of your rights, please contact me.

Updating your information and withdrawing your consent

If you believe that the information we hold about you is inaccurate or that we are no longer entitled to use it and want to request its rectification, deletion, or object to its processing or want to withdraw any consents you have given us, please contact me.

Access Request

In the event that you wish to make a Data Subject Access Request, you may inform us in writing of the same. We will respond to requests regarding access and correction as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days, we will tell you why and when we will be able to respond to your request. If we are unable to provide you with any Personal Data or to make a correction requested by you, we will tell you why.

Complaint to a supervisory authority

You have the right to complain about our processing of Personal Data to a supervisory authority responsible for data protection. The Office of the Information and Data Protection Commissioner



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(IDPC) is the relevant data protection supervisory authority in Malta. The IDPC is located at 2 Airways House, Second Floor, High Street, Sliema SLM 1549, Malta and online at www.idpc.gov.mt. We would, however, appreciate the chance to deal with your concerns before you approach the IDPC or any other supervisory authority.

Validity and Questions

This Privacy Policy was last updated on Tuesday, 12th of December, 2023, and is the current and valid version. However, from time to time changes or a revision to this policy may be necessary.

If you feel that the above is not sufficient or if you have any queries as regards the collection, processing or use of your Personal Data we are looking forward to hearing from you. We will make every effort to reply as soon as possible and take into consideration any suggestions from your end.