

Privacy Policy



I. Our Commitment to Privacy

Syskit Ltd., Zagreb, Croatia (“Company”, “Syskit”, or “We”) recognizes your right to confidentiality, understands the importance of protecting personal information and is committed to protecting your privacy.

Last updated: September 2026

Changes to our Privacy Policy

- Removed references to Microsoft Dynamics 365, Gong, Marketo, and Bizible.
- Added HubSpot as our customer relationship management, marketing automation, sales, analytics, and customer engagement platform.
- Clarified that our HubSpot account is hosted in HubSpot’s European Union data center located in Frankfurt, Germany.

The European Parliament and the Council of the European Union have on 27th of April 2016 adopted Regulation (EU) 2016/679 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 (General Data Protection Regulation; GDPR) with a goal of respecting a natural persons’ fundamental rights regarding processing their personal data and especially respecting private and family life, home and communication, protection of personal data, freedom of thought, conscience and religion, freedom of expression and information, freedom to conduct a business, the right to an effective remedy and to a fair trial, and cultural, religious and linguistic diversity.

This privacy policy describes the types of information we may collect from you or that you may provide when you visit our Websites (hereinafter: “**Websites**” or “**Sites**”) or use our services in general (hereinafter: “**Services**”); as well as our practices for collecting, using, maintaining, protecting and disclosing such information.

This policy applies to the information we collect on all Websites and Services, in email, text and other electronic messages between you and the Websites and Services, through desktop and web applications you download from the Websites or register for on the Websites, and your interaction with Syskit Ltd. Services.

This Privacy Policy **applies to** all users and visitors (natural persons) of our Websites, as well as to all users of our products and services. Also, it applies to all people working or being in communication with our team members and job applicants.

This Privacy Policy **does not apply** to the processing of personal data regarding legal persons, especially entrepreneurs set up as a legal entity, including the name and the legal form of the legal person, its contact details and persons acting in the name of those legal persons. Regardless of the application of this Privacy Policy, Syskit Ltd. collects

personal information of legal persons in the same way as personal data of all other users and visitors (natural persons) to whom this Privacy Policy applies.

This Privacy Policy does not apply to anonymous data and data which has been altered in a such way that it cannot be linked to any particular natural person or it cannot be linked without a disproportionate effort. In order to acquaint our users with it and to clarify any doubt, this Privacy Policy also prescribes the ways of collecting anonymous data.

Syskit Ltd. is, in accordance with the provision of the GDPR 2016/697, the controller of all personal data collected pursuant to this Privacy Policy.

Please read this policy carefully so that you understand our policies and practices regarding your collected information and how we will treat it. If you do not agree with our policies and practices, your only recourse is not to use Syskit Websites and Services. By accessing or using any Syskit Websites, or purchasing or using our products and Services, you agree to this privacy policy regarding data collection which is automatic and anonymous data collection. Regarding the collection of the identifiable data, you will be asked for consent, according to what is stated below in this Privacy Policy, unless the consent is not necessary due to contractual relationship being the legal basis of the identifiable data collection.

II. Definition of Personal Information

Personal Information is defined as “any information about an identifiable individual” that can be used on its own or with other information to identify or contact the individual. For instance, your name, email address and other contact details and any similar information can be classified as personal information.

We recognize a non-identifiable personal information which can be collected automatically by your usage of our Websites and Services. This information can include details of your visits to our Websites and Services, details about your hardware or software, including traffic data, location data, logs and other communication data and the resources that you generate by accessing and using of our Websites and Services. This information doesn't identify you as an individual, and it is used as statistical data to improve our Sites and Services.

However, after you become a client or fill in the forms on our Websites (which actions constitute expression of your voluntary and unequivocally desire/will) as described below in this Privacy Policy, We might connect/link the previously acquired anonymous data to your identifiable data. This for the sole purpose of fulfillment of obligations from our contractual relationship or for the purpose for which you have filled in the prespective form.



III. Information We Collect & How We Use It

Whenever you interact with Syskit, by visiting Websites, filling-in the forms on Websites, otherwise communicating with Syskit and its team members, using our products and Services, this Privacy Policy applies.

In general, through known and widespread tools implemented on our Websites, through usage of our products and your direct interactions with us, through publicly available sources or from data enrichment providers, we may collect common **types of personal information** such as: name, surname, job title, company, industry, postal address, email address, phone number, and your computer's IP address, whenever you solely decide to enter such information in certain forms, send inquiries or otherwise contact us and, through such communication, provide us with your personal information. Also, among collected data there will be non-identifiable data, all as described in the respective sections below.

In general, the **purpose** of collecting such personal information are, as the case may be, the following: processing orders submitted by you, customizing Services we provide to you, carry out our obligations in relation to any agreement you have with us, verify your identity (for example in cases you participate in any of our promotions), to anticipate and resolve any problems with products and services provided, carry out market research and surveys, carry out remarketing, send newsletters, track your engagement with us (including through Websites, articles and newsletters), to understand how you use our products and Services because client behaviour insight is of value to further develop and improve our products and services, to contact you and establish communication related to your use of our software downloaded from our Websites, to provide you with the information on our other products and services, to process your job application in case you show interest to join us.

We use HubSpot as our customer relationship management, marketing automation, sales, analytics, and customer engagement platform. HubSpot helps us manage communications with prospects and customers, process website forms, manage newsletter and webinar registrations, operate marketing campaigns, track engagement with our Websites and communications, manage sales activities, and better understand the customer journey.

Personal information stored in HubSpot may be collected through your direct interactions with us, including website forms, newsletter subscriptions, demo or trial requests, webinar registrations, email engagement, sales communications, publicly available sources, or other lawful sources. Such processing is carried out based on consent, contract, legitimate interest, or another applicable lawful basis, depending on the context.



Our HubSpot account is hosted in HubSpot's European Union data center located in Frankfurt, Germany. HubSpot states that its EU product infrastructure is hosted in Germany and that customer data is processed and stored in the assigned data center location, subject to limited exceptions such as certain add-ons, third-party products, analytics and usage data, sub-processors, and user access from other regions.

Below, you can find more detailed information regarding our conduct with your personal information.

1) Information We Collect on Our Websites

Based on our legitimate interest as a lawful basis, through our Websites, we collect (a) information you provide as a user by yourself, as well as we (b) automatically collect information about your computer hardware and software.

This means that we collect whatever personal information you solely decide to give us by inquiries, requests for trial periods, forms fill-in etc. On the other hand, there are also technical information we collect automatically. Such can include details of your visits to our Websites and Services, including traffic data, location data, logs and other communication data, and the resources that you access and use on the Websites and visitor behavior patterns on our Websites, including through the use of third-party analytics services.

The information we collect automatically is statistical data which does not identify any individual. It helps us to improve our Sites and Services and to deliver better and more personalized future services by enabling us to do things such as estimate our audience size and usage patterns.

Syskit uses cookies, web beacons, web analytics or other technologies to automatically collect certain information about you when you visit our Website, utilize Syskit products, or otherwise interact with us. Please note, these may be first party cookies or tools, which are hosted within a Syskit domain name, or third-party cookies or tools, which are hosted by another party. Also, we use third-party services to help us improve the way we offer our products and services to the visitors of our Websites, mostly within our remarketing activities.

We store information about your preferences, which allows us to customize our Websites according to your individual interests, speed up your searches, recognize you when you return to our Websites and provide you with better services in the future. This information can also include your IP address, browser type, domain names, access times, and referring website addresses. Such data itself does not identify you in any way therefore you can visit the Syskit Ltd. website without telling us who you are or revealing any information about yourself.



Our authorized partners and we may use cookies and other information-gathering technologies for a variety of purposes, however only those purposes related to the performance of our business activities. We use it to provide you with a good experience when you browse our Website, to improve our Website and the services that we provide, for analytics purposes, and for targeted advertising.

These technologies may provide us with non-identifying personal information, information about devices and networks you utilize to access our Websites, and other information regarding your interactions with our Websites. Once you provide us with your identifying personal information by yourself, as described above, we may include that information in our CRM system as well as connect/link it with additional information acquired via here mentioned cookies and tracking technologies.

Anonymous data collected by Syskit Ltd. by using data-gathering technologies such as cookies, is stored and processed for the purposes stated above continuously, i.e., for the entire time until you turn off/cancel the use of cookies and similar technologies which is further explained in the text below.

Use of Cookies

During your first visit to the Website, you will be prompted by our Cookiebot service to manage your cookie preferences. By choosing to allow cookies and continuing to use our Website, you consent to the placement of cookies on your computer by Syskit Ltd and our third-party service providers. Cookiebot ensures that cookies are set on our website only after receiving your explicit consent, in compliance with relevant privacy laws and regulations.

If you do not wish to accept cookies, you can manage your preferences through Cookiebot or disable cookies via your browser settings specifically for this Website or globally. Please note that disabling cookies may affect the functionality of our Website and could prevent you from accessing certain features.

To withdraw your consent for cookies, you can revisit your Cookiebot settings or follow the guidance on how to delete or block cookies provided [here](#) or contact us via email at privacy@syskit.com.

You have the right to withdraw your consent at any time. However, withdrawal of consent does not affect the lawfulness of data processing carried out prior to the withdrawal.

For more detailed information about cookies, or how to control, disable, or delete them, please visit www.aboutcookies.org. Additionally, certain third-party advertising networks, including Google, allow users to opt out of or customize preferences associated with internet browsing. To learn more about this feature from Google, click [here](#).



Logs

We gather certain information and store it in log files when you interact with our Websites and Services. This information includes internet protocol (IP) addresses as well as browser type, internet service provider, URLs of referring/exit pages, operating system, date/time stamp, information you search for, locale and language preferences, identification numbers associated with your devices, and system configuration information. Stated data is being collected for the purpose mentioned above.

Occasionally, we connect personal information to information gathered in our log files as necessary to improve our Websites and Services. In such a case, we would treat the combined information in accordance with this Privacy Policy.

Google Analytics

We use Google Analytics which allows us to see information on user website activities including, but not limited to, page views, source, and time spent on our website. This information is depersonalized and cannot be tracked back to individuals.

Stated data is anonymous and is used solely for statistical purposes and in order to customize our services and websites according to the needs of our users.

Data mentioned in this section is used and stored for the entire time until the user decides to turn off this platform. That being said, users may opt-out of Syskit's use of Google Analytics by visiting the [Google Analytics opt-out page](#).

HubSpot

We use HubSpot, a cloud-based customer relationship management, marketing automation, sales, analytics, and customer engagement platform, to manage communications with prospects and customers, operate marketing campaigns, process website forms, send newsletters and other marketing communications, manage webinar or content registrations, track engagement with our Websites and communications, manage sales activities, and better understand the customer journey.

The purpose of using HubSpot is to automate and measure marketing and sales activities, improve communication with prospects and customers, personalize our interactions where appropriate, and optimize our Websites, products, and services.

Through HubSpot, Syskit may collect and process both anonymous or pseudonymous data and identifiable personal information, depending on how you interact with our Websites and Services.



HubSpot may collect information through forms, landing pages, emails, tracking code, cookies, and similar technologies. This may include, as applicable, your name, surname, business email address, company name, job title, phone number, country, information submitted through forms, communication preferences, pages visited, referral source, email engagement, campaign interaction, and other information relevant to your interaction with Syskit.

HubSpot tracking may collect information about visitor activity on our Websites, including page views, session information, referral information, and interactions with website content. This information is generally pseudonymous or anonymous until you identify yourself, for example by submitting a form, registering for a webinar, subscribing to a newsletter, requesting a demo, downloading content, requesting a trial, contacting our sales team, or otherwise providing personal information to Syskit.

Once you provide identifying personal information, Syskit may connect or link your previously collected website interaction data with your contact record in HubSpot, where permitted by applicable law and subject to your consent where required. The purpose of such processing is to understand your interests, respond to your requests, provide relevant communications, improve our marketing and sales processes, and provide a more personalized customer journey.

Our HubSpot account is hosted in HubSpot's European Union data center located in Frankfurt, Germany. HubSpot states that its product infrastructure includes an EU data center in Germany and that customer data is processed and stored in the assigned data center location. HubSpot also states that limited processing outside the assigned data center location may occur in specific cases, including certain add-ons, third-party products, HubSpot Content, analytics and usage data, sub-processors, and user access from other regions.

HubSpot processes personal data on behalf of Syskit as a processor where Syskit uses HubSpot to collect and process personal data for Syskit's own marketing, sales, analytics, and customer relationship management purposes.

HubSpot may set cookies in a visitor's browser for purposes such as website analytics, visitor recognition, session tracking, chat functionality, form submissions, and marketing engagement. HubSpot identifies the hubspotutk cookie as a main cookie used for visitor tracking.

HubSpot will only be used to send marketing communications where we have an appropriate legal basis to do so, such as your consent or our legitimate interest, as applicable. You may withdraw your consent or unsubscribe from marketing communications at any time by using the unsubscribe link in the relevant email or by



contacting us at privacy@syskit.com. Withdrawing consent does not affect the lawfulness of processing carried out before withdrawal.

Microsoft Bing – Bing Universal Event Tracking (UET)

We use Microsoft Bing Ads technology to collect and store data used to create usage profiles using pseudonyms. This service enables us to track user activity on our website when it has reached our website via Bing Ads advertisements.

If the page visitor reaches our Websites via such an ad, a cookie is set on their computer. On our website, a Bing UET tag is integrated. A UET tag is a code used to store some non-personally identifiable information about the Website's use in connection with the cookie. Non-personally identifiable information includes, among other things, the length of time spent on the website, which areas of the website were accessed, and which advertisements have reached the website. Information on the identity of the respective site visitor and forms for entering personal data is not recorded. The purpose of collecting such data is to provide a better user experience by improving our advertisements based on the data we collected.

The collected information is transmitted to Microsoft servers in the USA and stored there for a maximum of 180 days. The collection of the data generated by the cookie and related to the website's use and the processing of this data can be prevented by deactivating the setting of cookies by the site visitor in their browser.

In addition, based on the user's preferences, Microsoft may be able to track usage behavior across multiple electronic devices through cross-device tracking, enabling it to display personalized advertising on or in Microsoft websites and apps. The website visitor can disable this behavior at <https://choice.microsoft.com/en-us/opt-out>.

Google Ads

We use Google Ads Remarketing to advertise Syskit across the Internet and to advertise on third-party websites (including Google) to previous visitors to the website.

Ads remarketing will display ads to users based on what parts of the Syskit website they have viewed by placing a cookie on the users' web browser. It could mean that Syskit advertises to previous visitors who haven't completed a task on the site or this could be in the form of an advertisement on the Google search results page or a site in the Google Display Network.

This cookie does not in any way identify the user or give access to the users' computer or mobile device. The cookie is only used to indicate to other websites that the user has visited a page on the website, so that they may show the user ads relating to the visited page.



If users do not wish to participate in Google Ads Remarketing, they can opt out by visiting [Google's Ads Preferences Manager](#) or contact us via privacy@syskit.com.

Google will anonymize advertising data in server logs by removing part of the IP address after nine months and cookie information after 18 months.

Social Media Sharing

The Websites include third-party social media features. These features may collect your IP address, which page you are visiting on the Websites, and set a cookie to enable the feature to function properly.

There may be instances where our Websites feature social sharing buttons, which help to share web content directly from web pages to the respective social media platforms. You use social sharing buttons at your own discretion and accept that doing so may publish content to your social media profile feed or page.

It is very important that you are aware that your interaction with these features is governed by the privacy policy of the third-party companies and not Syskit Ltd.

Third-Party Websites

The Website may include links to third-party websites for your convenience and information only. We don't own or control these third-party websites or services. We encourage you to review the privacy policy of any third company before submitting any information to them. If you have any questions about how such third parties' privacy and data use practices, you should contact such third parties directly.

Some of the third-party providers (and link to their privacy policy) we use for our Website or Service include: [Google](#), [Facebook](#), [Twitter](#), [LinkedIn](#), [HubSpot](#), [BambooHR](#), [LogMeIn](#) (GoToMeeting, GoToWebinar) etc.

With respect to the third parties described herein, some of them have their own advertising options that we do not control and to which is applicable very similar as described above (e.g. Microsoft Bing UET, Google Ads etc.)

For any questions about our third-party integrations feel free to contact us at privacy@syskit.com.

2) Telemetry and Product Data that we collect

Through our products, we collect data as described below, for the purpose: measuring how many people are using the different versions of our products, and the different



features within them, understanding the environments in which our products are used, measuring the success of our sales and marketing operations, guide product development decisions and improve our products, assist you in your evaluation, purchasing, and renewal of our products and compare your usage of our products against the licenses you've purchased.

Product and Service Improvement

Except for processing specifically described in the "Syskit Point Assistant and Improvement of AI Features" section below, we collect product usage data as described in this section and do not associate such usage data with your name. We use this to better understand usage patterns of our products and the behavior of our collective audience. At times we may share this information in aggregated anonymous form with third parties.

The product usage data described in this subsection is collected only with your permission through the applicable Customer Experience Improvement Program. This consent-based processing is separate from the Point Assistant processing described below. Your permission shall be given by you stating your consent in a way of accepting the customer experience improvement program inside each product.

You have the right to withdraw your consent at any time and in the same way, the consent was given or by contacting us via privacy@syskit.com. Withdrawing consent does not affect the lawfulness of the data processing done before the withdrawal. Personal data collected in relation to utilizing our products and services are collected and processed from the moment of your consent until the moment of the eventual withdrawal of consent.

Syskit Point Assistant and Improvement of AI Features

Syskit Point may include optional artificial intelligence-powered functionality, including Syskit Point Assistant ("Point Assistant"). Point Assistant is enabled and configured by the Customer.

When an authorized user uses Point Assistant, Syskit may receive prompts, queries, instructions, metadata, and related information submitted through the feature ("Assistant Inputs"). Assistant Inputs may contain Personal Data or other Customer information depending on what the user submits.

We process Assistant Inputs as necessary to provide, operate, secure, maintain, support, and troubleshoot Point Assistant for the Customer.



Separately, where AI Features are enabled by the Customer and the applicable telemetry or data collection functionality is enabled, Syskit may retain and analyze Assistant Inputs for its own purposes of evaluating and improving the quality, reliability, functionality, safety, performance, and user experience of Syskit Point Assistant and related AI Features for its customers generally.

To the extent Assistant Inputs contain Personal Data and Syskit processes them for this product-improvement purpose, Syskit acts as an independent data controller.

Our legal basis for this processing is our legitimate interest under Article 6(1)(f) GDPR in evaluating, maintaining, securing, and improving Point Assistant and related AI-assisted functionality. We rely on this legal basis where, following an assessment of the relevant interests, we determine that our interests are not overridden by the interests, rights, or freedoms of affected individuals.

Only Assistant Inputs are retained for this product-improvement purpose. AI-generated Outputs are not retained for this purpose.

Assistant Inputs are stored as submitted by users. Syskit does not automatically remove Personal Data from Assistant Inputs before they are stored for product-improvement purposes.

Because Point Assistant permits free-form Inputs, Assistant Inputs may contain Personal Data, including sensitive information or special categories of Personal Data submitted by users. Syskit does not require or intentionally solicit special categories of Personal Data for product-improvement purposes. Users should avoid submitting Personal Data, special categories of Personal Data, or other sensitive information unless necessary for their permitted use of Point Assistant.

Authorized Syskit personnel may access raw Assistant Inputs where necessary for product-improvement, quality, support, security, or troubleshooting purposes. Such access is restricted and subject to applicable authorization, confidentiality, access-control, logging, monitoring, and security requirements.

Assistant Inputs retained for product-improvement purposes are stored for 90 days from collection, after which they are deleted.

AI Features are optional and may be enabled or disabled by the Customer. Where AI Features and the applicable telemetry or data collection functionality are enabled, Assistant Inputs may be collected and processed as described in these AI Terms. If the Customer disables AI Features or the applicable telemetry or data collection functionality, Syskit will cease collecting new Assistant Inputs for product-improvement purposes.



Syskit does not use Assistant Inputs to train or fine-tune the underlying artificial intelligence or machine learning models used to provide Point Assistant.

Where Syskit processes Personal Data contained in Assistant Inputs on the basis of legitimate interests, affected individuals have the right to object to such processing in accordance with applicable Data Protection Laws. Syskit will assess such objections as required by applicable law and, where the relevant Personal Data can be identified and deletion is required, Syskit will delete the applicable retained Personal Data from the systems used for product-improvement processing.

To exercise your rights or ask questions about this processing, please contact us at privacy@syskit.com or dpo@syskit.com.

Product Usage

When downloading and installing purchased software, you need to provide the software with identifiable information such as your Syskit account or licensing information. On installation and execution, the software may send Syskit certain information, including product version, product edition, and information about the operating system and/or environment where the product is installed. The software can also regularly check for available updates, as well as available updates for plugins or components or check for license validation. In addition, it can check for license validation, either using the license key or your Syskit account details. Some software products can also use license information to inform you of the availability of applicable updates.

If you opt in to anonymous data collection through the software product (which is distinct from data collection on the website through cookies and other tracking technologies), the software may electronically send information to Syskit related to your usage of the application's features.

Data collected in the way stated above are being collected based on the contractual relationship between Syskit Ltd. as a service provider or producer and you as a product or service user. Syskit Ltd. will use and process that data for the entire time of our contractual relationship and for a certain time after termination of the latter, all in order to enable you to use the product or the services in their entire form.

3) Information That You Provide to Us

Syskit Ltd. collects personally identifiable information, such as your email address and name, only at your request or when you choose to provide it to us.



Such information may be collected when you: apply for a job at Syskit; download, register or install a product for a trial evaluation; download, register to or install a free tool; request a quote; request a demo; purchase or register a product; request support; sign up for newsletters, support materials, white papers, our email list, our blog or any other assets offered by Syskit; obtain support, services, or training; create a user account on our Website, customer portal or community forum; or otherwise contact us.

The personal information we collect may include your name, address, email address, telephone number, user name, password(s), information about the products that you own and use, or your payment information. Such information may be required to create your account or to complete your purchase.

If you use a third-party to create your account or otherwise link to us, we may receive certain information about you from a set third-party (such as a social network) based on your registration and privacy settings on that third-party service.

Personal data collected in relation to our products and services is collected on the basis of the contract, i.e. based on the contractual relationship, while all other personal data for all other purposes, which includes but is not limited to applying for a job, requesting an offer, advice or help, registering for a newsletter, requesting assistance material, setting up a user profile on our website or for any kind of contact, is collected based on your consent.

Once given consent regarding the collection and processing of your personal data you may withdraw at any time by deleting your account or by contacting us via e-mail: privacy@syskit.com. Withdrawing your consent does not affect the lawfulness of the data processing done before the withdrawal.

The aforementioned data collected on the basis of the contractual relationship, Syskit Ltd. shall process and store for the entire duration of the contractual relationship, and in case of termination of it, Syskit Ltd. shall store such data as long as there is a legal basis for it.

User-Generated Content – Posts You Publish to Our Websites

Please note that Syskit is not responsible for the privacy of any information that you choose to post to our Websites, including in our blogs, or for the accuracy of any information contained in those postings. Any information that you disclose becomes public information.

Providing Support to You

We may need to ask you for data to process your support request. We may have to access and/or request a failure code, which may contain the personal data of the user



who reported the failure. At this moment, you expressly consent to the collection and storage of this data.

Giving consent for the processing of the stated personal data represents a necessary condition for providing services by Syskit Ltd.

Marketing Terms & Conditions

When you sign up for webinars, newsletters, and/or other marketing materials, we collect the personal information you provide us. This includes personal details such as name, email address, company name, and possibly other information relevant to the offerings.

We may periodically send you emails with information regarding Syskit and our products. If you no longer wish to continue receiving such information, please click the “unsubscribe” link available at the bottom of the relevant email. You can also contact us at privacy@syskit.com, and let us know that you no longer wish to receive such information.

Promotional and Marketing Purpose

We may use feedback that you provide voluntarily on our products or Services. We also may use data that we collect and aggregate to assist us in determining appropriate marketing and advertising for our products and services. In doing so, we may share aggregated data with third parties to assist us with these efforts. Such aggregated data does not enable any person to identify users and/or extract data regarding a particular user from such aggregated data.

You have the right to, at any time, request from us to opt-out from the decision based on automatic personal data processing by sending an e-mail to privacy@syskit.com.

IV. Collection and Use of Personal Information

We collect and process Personal Data for different purposes and rely on the legal basis appropriate to each processing activity.

One legal basis on which Syskit may rely is legitimate interests under Article 6(1)(f) GDPR. “Legitimate Interests” refers to the legitimate interests of Syskit in conducting and managing our business, providing secure and effective products and services, communicating with customers, and evaluating and improving our products and services.

Our legitimate interests may include, depending on the relevant processing activity:



- communicating with customers regarding Product Updates, Pricing Changes, and Account Information;
- maintaining the security, reliability, and performance of our products and Services;
- understanding and resolving product-quality and technical issues; and
- evaluating and improving Syskit Point Assistant and related AI-assisted functionality.

Where we rely on legitimate interests, we assess the necessity of the processing and balance our interests against the interests, rights, and freedoms of affected individuals. We do not rely on legitimate interests where we determine that such interests are overridden by the rights and freedoms of the individual.

V. Sharing of Collected Information

Syskit will not sell, rent or trade personal information to any third party. However, Syskit may share personal information when authorized and/or required by law or as follows:

Service Providers. We share information, including personal information, with our third-party service providers that we use to provide hosting for and maintenance of our Websites, application development, backup, storage, payment processing, analytics, and other services for us. These third-party service providers may have access to or process your personal information for the purpose of providing their services for us. We do not permit our third-party service providers to use the personal information that we share with them for their marketing purposes or for any other purpose than it is in connection with the services they provide to us.

Acquisitions or Other Business Transfers. If Syskit is acquired by or merged with another legal entity, if substantially all our assets are transferred to another entity, or we find ourselves a part of a bankruptcy proceeding or other business transfer, we may transfer the personal information we have collected from or about you to the third-party.

As Permitted or Required by Law. Syskit may use and disclose your personal data if required by law, such as in response to a court order, valid subpoena, or other legal, government, or law enforcement processes or investigatory actions.

Business Transactions. Administer or operate the Syskit products, services, or Website, including completing a transaction, providing you with products or user support, responding to your requests for information, preventing transactional fraud, or otherwise contacting you.



Testimonials or Case Studies. We may post testimonials or a Case study on the Websites that may contain your information such as name, job title and company. We obtain your consent to publish your name along with your testimonial by you marking the check-box for acceptance of this Privacy Policy. If you wish to update or delete your testimonial, you can contact us at privacy@syskit.com.

With Your Consent. We may also share personal information with third parties when we have your consent to do so.

Aggregated Data. Except as otherwise set forth herein, Syskit may provide aggregated statistics about users to third parties, but such information will be aggregated so that it does not identify an individual or company.

Protection of Rights and Interests. We may use and disclose your data where we believe, in our sole judgment, that it is appropriate to do so to protect our rights and interests and the rights and interests of other users of Syskit products or services. Or where we believe there has been a violation of this privacy policy that could affect the interests of Syskit or its customers.

VI. Where Data Is Processed & Transferring Data to Third Countries

Syskit Ltd. all collected personal data processes, usually, in the Republic of Croatia and other members of the European Union. Data is, in general, processed in electronic form.

In order to provide a global service, we transfer information to our affiliates and our service providers situated outside the European Economic Area [EEA], and it may be processed by staff operating outside the EEA. When we do this, we take steps to ensure that your privacy rights continue to be protected in accordance with EU data protection law. In case of transferring personal data in any third country, Syskit Ltd. uses the same safety measures to assure personal data to be protected as much as possible by applying pseudonymizing, anonymization and encryption.

VII. Data Security and Data Storage Period

We have implemented measures designed to secure your personal information from accidental loss and unauthorized access, use, alteration, or disclosure. All information you provide to us is stored on our secure servers behind firewalls.

The safety and security of your information also depend on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Websites or Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Syskit Ltd. shall collect and process your personal data for the entire duration of the contractual relationship or until you withdraw your consent.

In case you withdraw your consent or if the contractual relationship is terminated, Syskit Ltd. shall store your personal data as long as there is legal basis for it.

Notwithstanding the general retention periods described above, Assistant Inputs retained by Syskit as an independent controller for the purpose of evaluating and improving Syskit Point Assistant and related AI Features are retained for 90 days from the date of collection. At the end of the 90-day period, such Assistant Inputs are deleted.

Where applicable, relevant Assistant Inputs may be deleted before the expiry of the 90-day period following a valid request to exercise data protection rights or as otherwise required by applicable law.

VIII. User's Rights Regarding Their Personal Data

In case Syskit Ltd. collects and processes your personal data based on your consent, you have the right to withdraw that consent at any time. Withdrawing your consent does not affect the lawfulness of the data processing done before the withdrawal.

The Right to Object: Where Syskit processes your Personal Data on the basis of legitimate interests under Article 6(1)(f) GDPR, you have the right to object to that processing at any time on grounds relating to your particular situation.

This includes Personal Data contained in Assistant Inputs processed by Syskit for its own product-improvement purposes.

Following an objection, Syskit will assess the request in accordance with applicable Data Protection Laws. Where the relevant Personal Data can be reasonably identified within retained Assistant Inputs and Syskit does not have compelling legitimate grounds to continue the processing, Syskit will delete the applicable retained Personal Data from the systems used for product-improvement processing.

Due to the nature of free-form Assistant Inputs, Syskit cannot prevent other authorized users from subsequently submitting new Inputs that may independently contain Personal Data relating to the same individual.

You may submit an objection by contacting privacy@syskit.com or dpo@syskit.com.

The Right To be Informed: All users can at any time request from Syskit Ltd. access to their data, that is request from Syskit Ltd. to give the information about which personal data is processed, for which purpose, for what time period, and is such data being given to anyone. Syskit Ltd. needs to provide information about who are the recipients, is



automatic processing applicable to the user in question and has personal data been transferred to any third country or international organization. Syskit Ltd. may charge a reasonable fee for giving such information, all based on administrative cost.

The Right to Erasure: Users may request correction or erasure of their personal data under the terms and conditions set out in the General Data Protection Regulation.

The Right of Access: Users may request request access to your personal data, enabling you to receive a copy of the personal data we hold about you and to verify the lawfulness of our processing activities.

The Right to Restriction of Processing: Users may request that we temporarily or permanently stop processing all or some of your personal data.

The Right to Data Portability: Users may request from Syskit Ltd. to transfer their personal data to a certain third person and can request the limitation of the processing of their personal data.

The Right Regarding Automated Decision-Making and Profiling

Syskit Ltd. does not engage in automated decision-making or profiling that produces legal effects or significantly affects you.

If such processing is introduced in the future and is not based on your explicit consent, required for a contract, or authorized by law, you will have the right to:

- Obtain human intervention
- Express your point of view
- Contest the decision

Regarding the processing of their personal data, users have the right to object to the relevant body, i.e. relevant data protection agency – Croatian Personal Data Protection Agency, Zagreb, Selska cesta 136.

If at any time you choose to cease using Syskit Software Products, you may ask for your data to be removed from our servers by writing to privacy@syskit.com. In case you cease using our software and/or services, we will not be responsible for retention of any of your data.

As permitted by applicable law, EU residents may request a copy of the information that we hold about them. To do so, please contact: privacy@syskit.com, or submit [Data Privacy Request form](#). Syskit may charge a fee in accordance with applicable law for this service.



XI. Data Protection Officer (DPO) & Contacts

Pursuant to the provisions of the General Data Protection Regulation, Syskit Ltd. has appointed the Data Protection Officer who you can contact at the following e-mail address: dpo@syskit.com

Subject Access Requests (SAR):

To submit a Subject Access Request (SAR) to access the personal data we hold about you, please follow these steps:

1. **Contact the DPO:** You can submit your SAR by emailing our DPO at dpo@syskit.com. Please include "Subject Access Request" in the subject line.
2. **Provide Identification:** To ensure the security of your personal data, we may require you to provide proof of your identity. Acceptable forms of identification include a photocopy of your passport, driver's license, or other government-issued ID.
3. **Specify Your Request:** Clearly describe the information you are requesting. This can include details such as the specific data you want to access, the time period of the data, or the specific processing activities related to your data.
4. **Response Time:** We will respond to your request within one month of receiving it. If your request is complex or numerous, we may extend this period by up to two additional months, but we will inform you of the extension and explain the reasons for the delay.

For further information on your rights and how to exercise them, please refer to the relevant sections of this privacy notice.

Any questions or complaints regarding this Policy can be addressed by sending an email to: privacy@syskit.com // Syskit Ltd., Krste Pavletića 1, 10000 Zagreb, Croatia

Changes to Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you by email to the primary email address specified in your account and/or possibly through a notice on the Websites' home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Websites and this privacy policy to check for any changes.

