Privacy policy

Effective from 17 November 2026

This policy explains how Zybra s. r. o. processes personal data when selling the PrimaFLOW fibre blowing machine, when communicating with customers and when operating the website primaflow.sk. We comply with Regulation (EU) 2016/679 (GDPR), Slovak Act No. 18/2018 Coll. on the Protection of Personal Data and Slovak Act No. 452/2021 Coll. on Electronic Communications.

1. Controller and contact

Zybra s. r. o., Ulica Mikovíniho 217/4, 917 01 Trnava, Slovak Republic, company ID (IČO) 57 170 886, tax ID (DIČ) 2122597279, VAT ID SK2122597279, registered in the Commercial Register of the District Court Trnava, section Sro, file No. 60504/T.

Please send questions about data protection and requests to exercise your rights to info@primaflow.sk or by post to our registered office. You can reach us by phone at +421 905 512 515 (Mon – Fri 8:00 – 17:00). We have not appointed a data protection officer, as we are not legally required to do so.

2. In brief

- We need the data from your order to conclude and perform the contract and to issue invoices.
- We send business e-mails to companies at their publicly listed business contacts. Every e-mail contains a one-click unsubscribe link.
- We collect website statistics only if you consent in the cookie banner. We do not use third-party tools or advertising cookies.
- Fonts and all website files are stored on our own hosting, so nothing is sent to companies such as Google when you visit.
- We do not transfer data outside the European Union and the European Economic Area, and we do not carry out profiling or automated decision-making.

3. Orders and conclusion of the contract

What data: name of the contact person, company name, company ID, tax or VAT ID, phone, e-mail, delivery address, ordered items, batteries used and any note you enter in the form.

Purpose and legal basis: processing and confirming the order, delivering the goods and communicating about the contract – Art. 6(1)(b) GDPR (performance of a contract and pre-contractual steps). Issuing invoices and keeping accounts – Art. 6(1)(c) GDPR (legal obligation under Slovak Act No. 431/2002 Coll. on Accounting and Act No. 222/2004 Coll. on Value Added Tax).

How it works: an order sent from the form is stored in the database on our hosting and is also e-mailed to the mailbox info@primaflow.sk. We send a confirmation of receipt to the address you provide.

How long: for the duration of the contractual relationship and the warranty period. Accounting documents and the data on them are kept for 10 years after the end of the year to which they relate. If no contract is concluded, we keep the order data only as long as necessary to handle the enquiry, for a maximum of 12 months.

Providing the data marked as required is necessary to conclude the contract. Without it we cannot process the order.

Register of sold machines, service and complaints: for every machine sold we record its serial number, date of sale, the buyer and, where applicable, the end user, the proof of purchase and all service interventions including complaints. This involves identification and contact details of the company and its contact person and the description of the fault. The purpose is to assess the warranty, handle a complaint or repair and keep the service history of the machine. The legal bases are the performance of a contract (Art. 6(1)(b) GDPR), compliance with legal obligations when handling complaints (Art. 6(1)(c) GDPR) and our legitimate interest in the service history and safety of the machines (Art. 6(1)(f) GDPR). We keep the data for the service life of the machine, at most 10 years from the sale; invoices for 10 years under the Accounting Act.

Withdrawal from the contract (consumers): if you withdraw via the “Withdraw from contract here” button, we process your name, e-mail, order or invoice number and optional details (date, goods, note) to acknowledge and handle the withdrawal and refund the payment – compliance with a legal obligation, Art. 6(1)(c) GDPR in conjunction with Slovak Act No. 108/2024 Coll. on consumer protection. We keep the data for 4 years from the withdrawal.

4. Enquiries and general communication

If you write to us or call us, we process your contact details and the content of the communication in order to reply. The legal basis is pre-contractual steps taken at your request (Art. 6(1)(b) GDPR) or our legitimate interest in answering questions about the product (Art. 6(1)(f) GDPR). We keep the communication as long as necessary to handle it and for any follow-up cooperation, for a maximum of 3 years from the last contact if no contract results from it. Replies to our e-mails (for example to a business offer) are also forwarded for handling to PrimaTEL s.r.o. (info@primatel.sk), which takes part in selling PrimaFLOW.

“Call me back”, “Demonstration” and “Quotation by e-mail” forms and the contact option in the compatibility checker: we process the details you enter (name, phone, e-mail, company, city or region, note, number of machines, route parameters) in order to call you, arrange a demonstration or send a quotation. The legal basis is pre-contractual steps taken at your request (Art. 6(1)(b) GDPR). The request is stored in the database on our hosting and sent by e-mail to info@primaflow.sk. We send the quotation to the e-mail address you provide; it is also available via a non-public link in that e-mail. We keep the data for a maximum of 3 years from the last contact if no contract results. The “Own or rented?” calculator runs only in your browser and we do not store the numbers you enter. With consent to statistics we record only an anonymous summary of the calculation.

5. Business e-mails to companies (B2B)

Who receives them: internet service providers, installation contractors and distributors active in fibre-optic networks.

What data: company name, business e-mail, phone, website, region, type of company, the name of a contact person if the company lists them as its contact, and a link to the page the contact was taken from.

Where we get it: exclusively from publicly available sources – company websites, public registers of electronic communications providers and member lists of professional associations. We record the source of every contact.

Purpose and legal basis: presenting the PrimaFLOW product and related news – our legitimate interest in direct marketing to businesses (Art. 6(1)(f) GDPR, Recital 47 GDPR). We have assessed that these are business contacts that the companies themselves published for business communication and that the e-mails relate to their line of business.

Unsubscribing and objecting: every e-mail contains a one-click unsubscribe link and a List-Unsubscribe header. You can object to processing for direct marketing at any time, also by e-mail to info@primaflow.sk (Art. 21 GDPR). After unsubscribing we will not send you any further marketing e-mails. We keep the

address on a suppression list solely so that we can respect your objection in future campaigns.

Measurement in e-mails: to evaluate whether our e-mails were useful, we record when an e-mail is opened (using a small image loaded from our server) and when links are clicked (via a redirect on our server). We store the time of opening and clicking and the link address. You can block open tracking by not displaying images in your e-mail program.

How long: until you object, for a maximum of 3 years from the last contact. Unsubscribe records are kept for as long as we carry out marketing activities.

We send e-mails gradually, at most 250 per hour, from our own mailbox on our hosting server. We do not use external bulk-mailing platforms.

6. Website statistics

We measure visits **only with your consent**, which you give with the “Accept all” button or by enabling the Statistics category in the cookie settings (Art. 6(1)(a) GDPR and Section 109 of Slovak Act No. 452/2021 Coll.). Without consent, the visit is not counted.

What we record: the page visited, the referring website, the type of device, browser and operating system, language, campaign parameters (UTM) and selected actions on the website (for example use of the guide or the compatibility calculator). We distinguish visitors only by a daily pseudonymous identifier calculated from the IP address and browser type. We do not store the IP address itself, and the identifier changes every day.

How: measurement takes place directly on our server. We do not use Google Analytics, social networks, advertising networks or any other third-party tools.

How long: 26 months. You can withdraw your consent at any time via the “Cookie settings” link in the website footer. Withdrawal does not affect the lawfulness of processing before the withdrawal.

7. Technical logs and manuals via QR codes

Server logs: our hosting provider automatically records the IP address, time, requested address and browser type for every request to the website. These logs serve the security and operation of the website and the detection of misuse – legitimate interest (Art. 6(1)(f) GDPR). They are kept for approximately 14 days.

Machine manuals (QR codes): the QR codes on the machines lead to primaflow.sk/docs/, which selects the right language version of the manual based on the browser language. In doing so we record the time, IP address, browser type and the language version selected, so that we can deliver the right document and keep operational statistics – legitimate interest (Art. 6(1)(f) GDPR). These records are kept for a maximum of 12 months.

Administration: a strictly necessary session cookie is used when our staff log in to the website administration. It does not concern website visitors.

8. Recipients

We disclose data only to the extent necessary for the purpose concerned:

- **WebSupport s. r. o.**, Karadžičova 12, 821 08 Bratislava, company ID 36 421 928 – web hosting, database and mailboxes (processor),
- carriers and courier companies – delivery of goods (name, address, phone),
- an external accountant or tax adviser – accounting and taxes,
- public authorities where required by law.

We do not transfer personal data to third countries outside the European Union and the European Economic Area. We do not use profiling or automated decision-making with legal effects.

9. Your rights

- **access** to your data and a copy of it (Art. 15 GDPR),
- **rectification** of inaccurate or incomplete data (Art. 16 GDPR),
- **erasure** of data where there is no longer a reason to process it (Art. 17 GDPR),
- **restriction** of processing (Art. 18 GDPR),
- **portability** of data we process on the basis of a contract or consent (Art. 20 GDPR),
- **objection** to processing based on legitimate interest (Art. 21 GDPR) – for direct marketing without giving reasons and with immediate effect,
- **withdrawal of consent** at any time, without affecting the lawfulness of processing before withdrawal (Art. 7(3) GDPR).

Send your request to info@primaflow.sk. We will reply without undue delay and at the latest within one month (Art. 12(3) GDPR). If we have doubts about your identity, we may ask you to verify it.

If you believe that we handle your data unlawfully, you can lodge a complaint with the **Office for Personal Data Protection of the Slovak Republic** (Úrad na ochranu osobných údajov Slovenskej republiky), Hraničná 12, 820 07 Bratislava 27, dataprotection.gov.sk, or with the supervisory authority in the country where you live or work.

10. Security

The website communicates exclusively over an encrypted connection (HTTPS). The database and configuration are stored outside the publicly accessible part of the server, and access to the administration is password-protected and limited to authorised persons.

11. Changes to this policy

We update this policy from time to time, for example when our processing or the law changes. The current version is always published on this page with the date of the last update.

This document is a translation. In the event of any conflict, the Slovak version prevails.