

Privacy Policy

(hereinafter referred to as the "Policy")

Operator: Oakmont s.r.o.

Application: MonthlyFocus

Effective Date: December 15, 2025

At Oakmont s.r.o., we value your privacy and are committed to protecting your personal data. This Policy explains how we handle your information when using the MonthlyFocus mobile application and our website.

To fully utilize the MonthlyFocus application and synchronize your goals across devices, registration is required. During registration, we process your email address and name. We use this data exclusively for managing your account, ensuring access to your data, and sending important system notifications. Your goals and habits stored in the app are private and serve only to display your progress within the application.

1. Basic Provisions

1.1 This Policy is prepared by Oakmont s.r.o., with its registered office at Rozkvet 2082/175, Považská Bystrica 017 01, Slovak Republic, ID (IČO): 53 128 125, registered in the Commercial Register of the District Court Trenčín, Section: Sro, Entry No.: 40220/R (hereinafter referred to as the "Operator").

1.2 The Operator is the provider of the MonthlyFocus mobile application (hereinafter referred to as the "Mobile Application") and the website monthlyfocus.app.

1.3 The purpose of this Policy is to provide concise, transparent, understandable, and easily accessible information regarding the processing of personal data of MonthlyFocus Mobile Application Users.

1.4 This Policy is an integral part of the Terms and must be read and interpreted together with the Terms. In case of conflict between the Terms and this Policy, this Policy shall prevail.

1.5 This Policy is prepared in accordance with Art. 13 and Art. 14 of the GDPR.

2. Definitions and Interpretation

2.1 Capitalized words used in this Policy have the following meanings:

- **GDPR** is Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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);

- **Unregistered User** is any natural person who uses the Mobile Application and who has not created an account (not registered) and for the purposes of Art. 7 of the Policy also any natural person who uses the Operator's pages on social media platforms;
- **Terms** are the General Rules of Use and terms for users of the Mobile Application, which are available on the website monthlyfocus.app;
- **Registered User** is a user of the Mobile Application who has created an account (registered);
- **User** is a Registered User and/or an Unregistered User;
- **Act** is Act No. 18/2018 Z. z. on the Protection of Personal Data and on amendments to certain acts, as amended;
- **Contract** is primarily the contractual relationship concluded between the Operator and a Registered User, the subject of which is the provision of services or products of the Operator to the Registered User and from which certain rights and obligations arise for both the Operator and the Registered User. A Contract also refers to registration in the Mobile Application;
- **Profiling** is any form of automated processing of personal data consisting of the use of such personal data to evaluate certain personal aspects relating to the User.

2.2 The User is a data subject within the meaning of the GDPR.

3. Purposes of Personal Data Processing

3.1 The Operator processes personal data of Users for the following purposes:

- registration in the Mobile Application and creation of an account in the Mobile Application;
- use of any services and functionalities of the Mobile Application;
- fulfillment of the Operator's legal obligations in the field of tax administration, accounting, and registry;
- keeping records and handling court disputes and other legal proceedings by which the Operator primarily monitors the proving, exercising, or defending of its legal claims;
- keeping records of received and sent mail.

4. *Legal basis for the processing of personal data*

4.1 The Operator processes Users' personal data based on the legal grounds listed in this Art. 4 of the Policy.

4.2 Legal basis of consent (Art. 6 par. 1 lit. a) GDPR). 4.2.1 The Operator processes personal data for the purpose of implementing direct marketing, sending commercial communications by all available means, including electronic means of communication (newsletters) in relation

to Users. For these purposes, the Operator processes the identification personal data of the User in the scope of: e-mail address. 4.2.2 The User may unsubscribe from the newsletter at any time by clicking on the unsubscribe link located in the footer of every e-mail that the User receives from the Operator. The User may also notify the Operator of their decision to unsubscribe by e-mail at info@monthlyfocus.app.

4.3 Legal basis for the performance of a contract (Art. 6 par. 1 lit. b) GDPR)

4.3.1 The Operator processes personal data for the purpose of the necessity of fulfilling the subject of the Contract, or the necessity of performing measures before concluding the Contract, including the handling and registration of complaints. 4.3.2 The provision of personal data by the Registered User during registration and account creation in the Mobile Application is a necessary requirement for the conclusion of the Contract, whereby in the event of their non-provision, the Operator cannot create an account and conclude the Contract. 4.3.3 For these purposes, the Operator processes identification personal data of the Registered User in the following scope (the scope of processed data may change depending on the specific Contract): email address, phone number, username, and technical identifiers necessary for synchronization, which the Registered User provides when concluding the Contract.

4.4 Legal basis for the fulfillment of a legal obligation (Art. 6 par. 1 lit. c) GDPR) 4.4.1 The Operator processes personal data for the purpose of the necessity of fulfilling its legal obligations set out primarily in Act No. 431/2002 Z. z. on Accounting, as amended, Act No. 222/2004 Z. z. on Value Added Tax, as amended, Act No. 595/2003 on Income Tax, as amended, Act No. 563/2009 Z. z. on Tax Administration (Tax Code) and on amendments to certain acts, as amended, Act No. 395/2002 Z. z. on Archives and Registries and on amendments to certain acts, as amended. 4.4.2 The provision of personal data by the Registered User is a necessary legal requirement, whereby in the event of their non-provision, the Operator cannot conclude a Contract with the Registered User, or in the case of its conclusion, would not be able to fulfill its legal obligations. 4.4.3 For these purposes, the Operator processes identification personal data and personal data for billing purposes in the scope specified in Art. 4.3.3 of the Policy.

4.5 Legal basis of legitimate interests (Art. 6 par. 1 lit. f) GDPR) 4.5.1 The Operator processes personal data for the purposes of the legitimate interests of the Operator or third parties. The legitimate interests of the Operator are the protection of the safety and interests of Users, the protection of the Operator's property, the prudent business of the Operator, the promotion of services, the good name and reputation of the Operator. 4.5.2 In connection with the above-mentioned legitimate interests, the Operator processes personal data for the purpose of keeping records and handling court disputes and other legal proceedings by which the Operator primarily monitors the proving, exercising, or defending of its legal claims and at the same time keeping records of received and sent mail. 4.5.3 The Operator specifically announces that the legitimate purpose of the Operator and third parties is also the processing

of personal data in connection with the implementation of direct marketing, i.e., market research and sending commercial communications to Registered Users, performing targeted marketing on social networks (e.g., through the tools of Facebook Inc.), increasing awareness of the Operator and its services in the online space, including Profiling, by all means, including electronic means of communication. Market research includes the evaluation of the Operator's activities in connection with the operation of the Mobile Application, data on the use of sent commercial communications and subsequent outputs. Processing on this legal basis and for this purpose takes place only if a Contract has been concluded between the User and the Operator. 4.5.4 For these purposes, the Operator processes identification personal data in the scope of name, surname, email address, phone number, and other data that the Registered User provides when concluding the Contract.

5. Rights of the User as a Data Subject

5.1 In connection with the processing of their personal data by the Operator, the User may at any time exercise their rights listed in this Art. 5 of the Policy with the Operator in the form of a request. In such a case, the Operator is obliged to provide the User with information on the measures taken based on their request without undue delay, but no later than within 1 month. The Operator may extend this period by another 2 months, in which case it shall inform the User of any such extension within 1 month of receipt of the request together with the reasons for the delay.

5.2 Right to withdraw consent (Art. 7 GDPR). If personal data is processed on the legal basis of the User's consent, the User has the right to withdraw their consent at any time without affecting the lawfulness of the processing based on the consent given before its withdrawal.

5.3 Right of access to personal data (Art. 15 GDPR). The User has the right to obtain confirmation as to whether the Operator processes their personal data, and if so, they have the right to obtain access to such personal data. The User also has the right to be provided with all information within these Policy, and the Operator updates this Policy regularly.

5.4 Right to rectification (Art. 16 GDPR). The User has the right to the rectification of personal data processed by the Operator about them without undue delay. The User also has the right to supplement incomplete personal data.

5.5 Right to erasure/to be forgotten (Art. 17 GDPR). The User has the right to the erasure of personal data that the Operator processes about them without undue delay. However, the right to erasure is not absolute, and it is necessary that at least one of the reasons within the meaning of Art. 17 par. 1 of the GDPR is met, or the Operator is not obliged to erase such personal data in the cases specified within the meaning of Art. 17 par. 3 of the GDPR.

5.6 Right to restriction of processing (Art. 18 GDPR). The User has the right for the Operator to restrict the processing of their personal data under the conditions specified in Art. 18 of the GDPR.

5.7 Right to portability (Art. 20 GDPR). The User has the right to receive the personal data they provided to the Operator in a structured, commonly used, and machine-readable format and has the right to transfer this personal data to another operator if they provided their personal data based on consent and the Operator processes this personal data by automated means.

5.8 Right to object (Art. 21 GDPR). The User has the right to object to the processing of personal data that the Operator processes about them if such processing is carried out on the legal basis of the performance of a task carried out in the public interest or for the legitimate purposes of the Operator or third parties, including objecting to Profiling based on these legal grounds. The User also has the right to object to the processing of personal data that the Operator processes about them for direct marketing purposes, including Profiling.

5.9 Right in connection with automated individual decision-making, including Profiling (Art. 22 GDPR). The User has the right not to be subject to a decision based solely on automated processing, including Profiling, which has legal effects concerning them or similarly significantly affects them.

5.10 Right to initiate proceedings (Section 100 of the Act). The User has the right to initiate proceedings on personal data protection within the meaning of Section 100 of the Act if they believe that the Operator processes their personal data in violation of the GDPR or the Act. The proposal to initiate proceedings according to the previous sentence is submitted to the Office for Personal Data Protection of the Slovak Republic, with its registered office at Hraničná 12, 820 07 Bratislava. More information is available on the web portal of the Office for Personal Data Protection of the Slovak Republic (<https://dataprotection.gov.sk/uouu/>).

6. Recipients of Personal Data

6.1 The Operator may provide the User's personal data to other natural or legal persons, public authorities, or international organizations.

6.2 The Operator provides the User's personal data primarily to the following categories of recipients:

- controlling or controlled entities and other entities in the horizontal or vertical hierarchy of the Operator's organizational structure;
- the Operator's business partners;
- legal, tax, accounting, and IT advisors of the Operator;

- entities providing cloud solutions and services and other entities providing or supplying technologies and supporting the functionality of the Mobile Application; and
- entities providing marketing activities (including social media service providers in targeted marketing and increasing awareness of the Operator and its services in the online space to the extent specified in this Policy), data-analytical activities, and/or archiving services for the Operator.

7. Use of Social Media Platforms

7.1 The Operator uses certain social media platforms to communicate with the User and to promote itself and its services. The Operator processes personal data using these platforms in various ways, as follows:

7.1.1 Pages. The Operator uses the User's personal data when the User posts content or otherwise communicates with the Operator on the Operator's official pages on Facebook, Instagram, LinkedIn, Twitter, TikTok, and other social media platforms. The Operator also uses the Page Insights service for Facebook, Instagram, and LinkedIn to display statistical information and reports related to the User's interactions with the pages managed by the Operator on these platforms and their content. If these interactions are recorded and form part of the information accessed by the Operator through these Page Insights services, the Operator is a joint controller of processing with the respective social media platform.

7.1.2 Event data for ad targeting. When targeting the User on social networks, the Operator may also use data provided by the User. "List-based" targeting occurs when the Operator uploads existing lists of personal data (e.g., email addresses or phone numbers) so that the social network provider can match them with information on the social network to create a target audience for displaying ads. In such a case, the Operator is a joint controller of processing with the respective social media platform.

7.1.3 Operator's relationship with Facebook and LinkedIn. Since the Operator is a joint controller with these platforms for certain types of processing operations (i.e., Pages services including page statistics and list-based targeting), it has entered into an agreement with Facebook and LinkedIn. The company Facebook, which is a joint controller of the User's personal data, is Facebook Ireland Limited, located at 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (hereinafter referred to as "Facebook"). The company LinkedIn, which is a joint controller of the User's personal data, is LinkedIn Ireland Unlimited Company, located at Wilton Place, Dublin 2, Ireland (hereinafter referred to as "LinkedIn"). Further information about these platforms and their use of User personal data is available here:

- The Facebook controller addendum for Page Insights is available at: https://www.facebook.com/legal/terms/page_controller_addendum and the Facebook controller addendum for business tools is available at: https://www.facebook.com/legal/controller_addendum.

- The LinkedIn controller addendum for LinkedIn Insights is available at: <https://legal.linkedin.com/pages-joint-controller-addendum>.

The Operator may also use the Custom Audiences service provided by Facebook for audience management for advertising campaigns or measurement and analytics services, within which Facebook processes personal data on behalf of the Operator to measure the performance and reach of the Operator's advertising campaigns and provides reports to the Operator about Users who saw and responded to the Operator's advertising campaign. In such cases, the Operator uses Facebook as a processor, using the following legal safeguards for processing the User's personal data: <https://www.facebook.com/legal/terms/businessstools> and <https://www.facebook.com/legal/terms/dataprocessing>.

8. Registration and Login through Third-Party Services

8.1 Registration in the Mobile Application is only possible through third-party login services. For this reason, a separate registration in the Mobile Application is not required; the respective third party will automatically provide the User's personal data to the Operator to the extent necessary for registration in the Mobile Application.

8.2 Registration according to Art. 8.1 of the Policy is possible through accounts established by Apple Inc., Google LLC, and Facebook Inc.

8.3 To provide user account management, secure authentication, and real-time data synchronization, we use the Google Firebase platform. Your data is stored on secure servers of this platform, which meet the highest security standards and are in compliance with the GDPR regulation.

9. Retention Period

9.1 The Operator stores the User's personal data for a period whose length varies depending on the category of personal data, the legal basis, or the purpose of personal data processing. In general, the Operator stores the User's personal data for the period:

- specified in generally binding legal regulations if the personal data is processed on the legal basis of the necessity of fulfilling legal obligations;
- of the duration of the Contract or pre-contractual relationships if the personal data is processed on the legal basis and for the purpose of fulfilling the subject of the Contract;
- of the duration of the legitimate interests of the Operator or third parties; or
- expressly stated in the User's consent or until the withdrawal of consent.

10. Transfer to Third Countries

10.1 The Operator may transfer the User's personal data to third countries, i.e., countries outside the European Union or the European Economic Area. In the case of transferring

personal data to third countries, the Operator always commits to ensuring a sufficient level of protection of the User's personal data.

10.2 The Operator does not transfer personal data to third countries that do not guarantee adequate protection of personal data.

11. Special Provisions

11.1 Registered Users may publish and share various personal data and other content in the form of posts (e.g., photos) in the Mobile Application, which will be accessible to the public.

12. Cookies

12.1 Our website is designed with your privacy in mind. We do not use any cookies (technical, analytical, or marketing) and we do not track your movement on the web.

13. Recap

To provide you with a full experience and synchronize your progress across devices, we process the following data:

13.1 **Account data:** Upon registration, we collect your email address and name. This data is used to manage your account, ensure access to your data, and password recovery.

13.2 **User content:** We store goals, habits, and progress data that you enter into the app. This is necessary to display your statistics and keep data up to date across devices.

13.3 **Technical data:** We may collect anonymous technical information (device type, OS version) to improve app performance and fix bugs.

We process your data based on:

13.4 **Performance of a contract:** Necessary for providing the basic services of MonthlyFocus (account management and synchronization).

13.5 **Legitimate interest:** To improve the functions of our application and ensure security.

13.6 **Consent:** If you sign up for motivational tips or news via email.

13.7 **Account deletion:** You can request the deletion of your account and all associated data at any time directly in the app settings or contact us by email. After deletion, your data is permanently removed from our active databases.

14. Final Provisions

14.1 The Operator reserves the right to change these Policy (primarily due to legislative changes), without the User's consent. In such a case, the Operator will publish the new full version of the Policy on the monthlyfocus.app website and Mobile Application, which fully replaces the previous version of the Policy and is effective from the effective date stated in the new version of the Policy, but no earlier than 14 days after the date of publication of the new version of the Policy (hereinafter referred to as the "Effective Date").

14.2 If the User continues to use the Mobile Application and its services even after the Effective Date, they agree to the new wording of the Policy without reservation.

14.3 In case of any questions regarding these Policy, the User may contact the Operator's responsible person at the email address **info@monthlyfocus.app** or in writing at the Operator's registered office address: Oakmont s.r.o., Rozkvet 2082/175, Považská Bystrica 017 01, Slovak Republic.

14.4 This Policy was prepared on 15.12.2025.