

GENERAL INFORMATION ON PERSONAL DATA PROCESSING

The processing of data subjects' personal data is governed by 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) (the "GDPR") and Act No. 18/2018 on Personal Data Protection and on the Amendment and Supplementation of Certain Acts (the "Act on Personal Data Protection").

This document aims to explain how data subjects' personal data are processed and what their rights under the GDPR and the Act on Personal Data Protection are.

1 Controller

CZ Slovakia, a.s., with its registered office at Pomlejská 24, 931 01 Šamorín (the branch's registered office: Dvořákovo nábrežie 8/A, 811 02 Bratislava), ID No.: 31 435 793, registered in the Commercial Register of the District Court Trnava, Section: Sa, File No.: 10418/T (the "**Company**"), is a person which, alone or jointly with others, determines the purposes and means of the processing of data subjects' personal data.

2 Collecting personal data

The Company collects personal data as follows:

- directly from its contractual partners when entering into contracts;
- from publicly available sources, such as public registers and registries;
- from persons who have voluntarily provided the Company with their personal data and granted their consent to the Company to process the same (by phone, e-mail, via the Company's website, etc.);
- from persons who enter the Company's premises.

The Company collects and processes personal data only to the extent proportionate for the purpose of their processing. At the same time, the Company places particular emphasis on security and protection of personal data and rights of the data subjects.

3 Legal grounds and the purpose of the processing

The Company processes personal data based on the following legal grounds established by the GDPR and the Act on Personal Data Protection:

3.1 Legitimate interest

The Company may process data subjects' personal data only if the processing is necessary for the purposes of the legitimate interests pursued by the Company or third parties, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. Such legitimate interests of the Company include in particular:

- the protection of the rights that the Company derives from the generally binding legal regulations and contracts in relation to its contractual partners and other persons; for this purpose, the Company retains personal data for a maximum of ten years following the termination of the contractual relationship;
- the recovery of receivables and other claims of the Company; for this purpose, the Company retains personal data for no more than the duration of the respective limitation periods;
- the prevention of fraudulent behaviour, where the Company has reasonable grounds to believe that there is a risk of such behaviour; for this purpose, the Company retains personal data for no more than the time limit laid down in the generally binding legal regulations;
- the protection of property, life and health and observance of public policy; for this purpose, the Company retains personal data of the persons entering the Company's premises for a maximum of 15 days following their entry;
- the Company's marketing activities, i.e. in particular notifications of select services or news of the Company; the communication may include surveys made to improve the satisfaction of contractual partners as well as general and specialised tailor-made business offers; marketing notifications are sent occasionally, usually several times a year, no more than around once a month; for this purpose, the Company retains personal data for no more than the duration of the Company's legitimate interest; for no more than during the contractual relationship between the Company and the data subject and during a reasonable period of time following the termination thereof.

3.2 Performance of a contract

The Company processes the data subjects' personal data for the purposes relating to the performance of contractual obligations of both parties, in particular the conclusion, amendment and termination of a contract, the granting of powers of attorney by the data subjects to the Company, invoicing, etc. The provision of personal data by a data subject to the Company to the necessary extent is a precondition for the conclusion of a contract. Failure to provide personal data may render a supply of goods or services to a data subject by the Company impossible. The Company provides data subjects with information on what personal data are necessary for the conclusion of a contract and which may be provided, for instance, for the purposes of communicating more effectively.

The Company retains personal data for the purposes of performing a contract for the duration of the contractual relationship between the Company and the data subject. Following the termination of the contractual relationship and the settlement of all liabilities arising from or related to the contract, the Company retains personal data for a necessary period, in particular for the period of limitation of potential claims following the termination of the contractual relationship and the settlement of all liabilities (including initiated lawsuits) or for a longer period of time where there the limitation period is interrupted.

3.3 Compliance with a legal obligation

The Company may process personal data, including the provision thereof to public authorities and other persons, provided it is obliged to do so under the law. On grounds of statutory obligation, the Company may, for instance, provide personal data to law enforcement authorities or other authorities or persons.

The Company retains personal data for the purposes of complying with a legal obligation for a maximum of ten years following the termination of the contractual relationship between the Company and the data subject.

3.4 Consent granted by the data subject

The Company processes data subjects' personal data based on a consent expressly granted by the data subject, where none of the other legal grounds may be applied.

The Company retains personal data processed based on the data subject's consent until such consent is revoked, whichever comes first. The data subject shall have the right to freely withdraw his or her consent to personal data processing at any time. Where the consent is withdrawn, personal data shall no longer be further processed, provided there is no other purposes of processing than that based on another legal ground. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

4 Recipients of personal data

The Company may authorise third persons, so-called processors, to process personal data. The Company's processors are, for instance, persons providing for some marketing activities to be carried out, external sellers, external suppliers and recipients of services, consultancy firms or security services. Processors process personal data for the Company solely under a personal data processing agreement which must meet the requirements laid down in the GDPR and the Act on Personal Data Protection and, in such cases, the Company is strictly committed to the protection of the personal data provided to the processors.

In some cases, the Company may provide the data subjects' personal data to processors outside the European Union Member States and countries which are not parties to the Agreement on the European Economic Area (the "**Third Countries**") that currently do not ensure an adequate level of personal data protection. If the Company provides the data subject's personal data to processors in Third Countries, it shall specify whether or not there is an adequacy decision by the European Commission or provides reference to the appropriate or suitable safeguards and the means to obtain a copy of them or where they have been made available.

5 Rights of data subjects

A data subject shall have the right:

5.1 to request the following from the Company:

- confirmation whether or not his or her personal data are processed; where the personal data has not been collected from the data subject, the data subject may request the provision of any available information as regards the source thereof (the "**the right of access to personal data**");

- where his or her personal data are processed, to obtain access to personal data and other information, and to obtain a copy of the personal data processed by the company (the “**right to be informed about processing**”); the company is entitled to charge the data subject a reasonable administrative fee in relation to the request for a copy of personal data;
- rectification of inaccurate/incomplete personal data processed by the Company (the “**right to rectification**”);
- erasure of personal data, where any of the grounds referred to in the GDPR and the Act on Personal Data Protection applies; in particular, if the personal data are no longer necessary in relation to the purposes for which the Company collected or processed them, if the data subject withdraws consent and the Company has no other legal ground for the processing, if the data subject objects to the processing or if the Company processed the personal data unlawfully; where official documents containing personal data are processed, the data subject may request to have them returned (the “**right to erasure**”);
- restriction of personal data processing, where any of the grounds referred to in the GDPR and the Act on Personal Data Protection applies; for instance, if a data subject reports that the Company processes inaccurate personal data concerning him or her, the data subject may request that these personal data are not processed until rectified (the “**right to restriction**”);
- receipt of personal data concerning him or her, which he or she has provided to the Company, in a structured, commonly used and machine-readable format; a data subject shall have the right to have those personal data transmitted to another controller, where technically feasible and subject to compliance with the conditions referred to in the GDPR and the Act on Personal Data Protection (the “**right to portability**”);

5.2 to object, on grounds relating to his or her particular situation, to processing of personal data concerning him or her and where processing is necessary for the purposes of the legitimate interests pursued by the Company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, including profiling; to object, on grounds relating to his or her particular situation, to processing of personal data concerning him or her and where processing is necessary for the performance of a task carried out in the public interest, including profiling; to object to processing of personal data for direct marketing purposes without his or her consent, which includes profiling to the extent that it is related to such direct marketing (the “**right to object**”);

5.3 to object not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her, unless the GDPR and the Act on Personal Data Protection provide otherwise (the “**automated decision-making, including profiling**”);

5.4 to withdraw, at any time, his or her consent to the personal data processing granted to the Company with effects from the moment of withdrawing the consent (the “**right to withdraw consent**”);

5.5 where there is a suspicion of unlawful personal data processing of the data subject, to file a request for initiation of proceedings concerning personal data protection with the Office for Personal Data Protection of the Slovak Republic, with its registered office at Hraničná 4826/12, 820 07 Bratislava, Slovak Republic, telephone No.: +421 2 3231 3220, www.dataprotection.gov.sk.

If a data subject does not have full legal capacity, his or her rights pursuant to the GDPR and the Act on Personal Data Protection may be exercised by his or her guardian. Pursuant to the GDPR and the Act on Personal Data Protection, the rights of a deceased data subject may be exercised by his or her close person.

Data subjects may exercise their rights as follows:

- in person in the Company’s registered office or in the registered office of the Company’s branch;
- by mail sent to the address of the Company’s registered office or the registered office of the Company’s branch;
- by e-mail to the Company’s address at czslovakia@czslovakia.sk.

With regard to potential risks of misuse and ensuring the protection of data subjects’ personal data, the Company defines the means of communication enabling the receipt of and response to a data subject’s request in relation to personal data processed by the Company. The Company also takes into account the technical aspects of some rights of a data subject and adapts the means of communication to guarantee these rights of the data subject. If in doubt as to the data subject’s identity, the Company is entitled to claim additional verification of his or her identity.

6 Automated decision-making, including profiling

The Company does not perform automated decision-making, including profiling, of data subject’s personal data, which produces legal effects concerning him or her or similarly significantly affects him or her.