# **Overview of Processing Personal Data of Business Partners**

according to Regulation (EU) 2016/679 of the European Parliament and the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the "GDPR Regulation") and Act No. 18/2018 Coll. on the protection of personal data and amending and supplementing certain Acts (hereinafter referred to as the "Data Protection Act").

The aim of this overview is to provide you with basic information about the processing of your personal data if you are our business partner.

#### Complete information is available at the contact address provided below.

### Identification and contact details

The controller processing your personal data is Company Terichem Tervakoski, a. s., Štúrova 101, 059 21 Svit, ID: 31 705 472 (hereinafter referred to as the "Controller").

In case of any ambiguities, questions regarding the processing of your personal data, suggestions, or complaints if you believe that we process your personal data unlawfully or unfairly, or to exercise any of your rights, you can contact us at any time by sending an email to: <a href="mailto:gdpr@sk.tervakoskifilm.com">gdpr@sk.tervakoskifilm.com</a>, or in writing to the address of the Controller.

Contact details of the Data Protection Officer supervising the processing of personal data: <a href="mailto:dpo3@proenergy.sk">dpo3@proenergy.sk</a>.

#### Basic overview of processing activities

We may process your personal data within the following processing activities (filling systems - FS):

Názov a popis spracovateľskej činnosti - účel a právny základ, iná dôležitá skutočnosť	Kategórie dotknutých osôb	Kategórie osobných údajov	Lehota na výmaz OÚ	Kategória príjemcov (externí)
Access control to the premises – authorized persons – if we have granted you regular access to our premises, we may monitor your authorization to enter, record your entry, and the entry of vehicles based on our legitimate interest.	employees, former employees (including agency staff), trainees, authorized external partners.	• personal data (standard – identification data, including photographs).	Access and electronic card management – duration of the employment or similar relationship, contractual relationship,     entry records – 1 year.	(1) police, other authorized entity, (2) SBS.
Camera system – if you move within our monitored premises, which are marked at the entrance with a camera pictogram, you will be recorded on camera footage. The purpose of such recording is to ensure security (including crime detection), protect life, health, property, and the financial interests of the Controller, as well as to protect the life, health, and property of individuals present in the monitored area. We respect your right to privacy and do not monitor with cameras any zones where you may reasonably expect privacy – these are in particular areas designated for rest and relaxation (kitchen, toilets, changing rooms, lounge/relaxation room, dining tables). The recordings may be used to establish liability on your part in case of violations of internal regulations (provided you have been made aware of them) and/or legal regulations related to threats or damage to property, life, health, safety, or financial interests. The processing is based on the legitimate interest of the Controller or a third party.	persons moving within the monitored area.	• personal data (ordinary – captured on camera footage).	7 days.	(1,5) police, other authorized entity, (2) SBS.
Litigation – We may process your personal data if we are engaged in legal proceedings with you, based on a legal obligation and/or within the legitimate interest of the Controller or a third party, for the purpose of establishing, exercising, or defending legal claims.	natural persons – controllers and processors, authorized persons of controllers and processors, data subjects, other	• personal data (especially identification, contact, and other personal data obtained or provided during legal	10 years from the final conclusion of the legal proceedings.	(1a,5) courts, (1b,5) low enforcement authorities, (1c) other authorized entity.

Názov a popis spracovateľskej činnosti - účel a právny základ, iná dôležitá skutočnosť	Kategórie dotknutých osôb	Kategórie osobných údajov	Lehota na výmaz OÚ	Kategória príjemcov (externí)
	natural persons in the position of parties to the proceedings.	proceedings). The sensitivity of the data is determined by the subject matter of the legal dispute (for example, data processing may involve information relating to the recognition of guilt for criminal offenses and misdemeanors).		
Accounting documents – we may process your personal data in connection with the performance of a contract with you for the purpose of fulfilling accounting and tax obligations in accordance with specific legal regulations.	clients/contractual partners of the controller, taxpayers of the controller	• personal data: identification, contact, financial/payment, and other data related to the fulfillment of the contract, accounting, and tax obligations.	10 years.	(1a) tax authority, (1b) auditors, (1c) other authorized entity, (5) contractual partners providing receivables insurance, factoring.
Whistleblowing – we may process your personal data if you have submitted a non-anonymous report of a potential anti-social activity, or if you are the subject or participant in the investigation of a potential anti-social activity pursuant to a specific legal regulation.	natural persons who have submitted a report of anti-social activity or a request for protection when reporting serious anti-social activity (or their close persons for whom protection is requested) and natural persons who are investigated based on such a report.	• personal data – those provided in the report and data necessary for its review (especially, standard identification personal data of the reporter, persons involved in the violation, and details of the report, which may include data of varying sensitivity).	3 years (from the date of receipt of the report).	(1) The Slovakian Office for the Protection of Whistleblowers, participants in the proceedings, another competent administrative authority, the Prosecutor's Office of the Slovak Republic, courts of the Slovak Republic, other authorized entity.
Business partner records – we may process your identification and contact data if you are our business partner (or a designated contact person), and such data are necessary for the fulfillment of our business relationships. The legal basis is legitimate interest.	the controller's business partners and the employees of the business partner.	personal data (standard – identification and contact data as typically found on a business card.	1 year.	(1) other authorized entity.

Názov a popis spracovateľskej činnosti - účel a právny základ, iná dôležitá skutočnosť	Kategórie dotknutých osôb	Kategórie osobných údajov	Lehota na výmaz OÚ	Kategória príjemcov (externí)
<b>Technical and organizational measures</b> – in order to ensure your security as well as ours (including your	employees, data protection officer,	• personal data (standard –	According to the chapter "Record	(1a,5) data protection
personal data), to demonstrate compliance with our	applicants	identification, contact	Keeping and	officer,
legal obligations, and to assert, exercise, or defend our	exercising their	data, which,	Archiving" of the	supervisory
legal claims or the claims of third parties, we may	rights, persons	depending on the	Personal Data	authority of SR,
process records containing your personal data. These	towards whom the	nature of the matter	Protection Policy	(1b,5) police, the
may include, for example:	controller fulfills	being addressed, may	and the	Prosecutor's
-records of your consent to data processing,	obligations arising	be supplemented	Information	Office of the
-records of fulfillment of our information obligations	from the GDPR,	with other necessary	Security Policy	Slovak Republic,
towards you,	persons involved in	data of various types	(most records are	courts of SR,
-records of handling your requests,	or addressed in	– e.g., login	kept for 3 years or	(1c) other
-records of authorized/assigned accesses and assets	connection with a	information, data	less, records	authorized
and their use, if we have granted/assigned them to you,	security incident,	related to	concerning	authority.
-records necessary for investigating security incidents	processors, other	user/offender	deletions or	
and data protection breaches,	external entities	behavior (e.g.,	containing	
-records (confirmations) of training provided to you,	(for example,	login/logout logs,	contracts for 5	
-records of confidentiality commitments you have made,	persons consulted	activities), data	years, and some	
-records if you were part of our control activities or	on the issue –	necessary to verify	records	
audits,	consultants,	the identity of the	permanently - e.g.,	
-other records related to the implementation of adopted	auditors, lawyers),	person exercising	those related to	
technical and organizational measures.	employees of	their rights, data	the handling of	
Processing is carried out in the legitimate interest of the	authorities under	indicating breaches	security incidents,	
controller and also as an obligation arising from the	specific legal	of internal	impact	
GDPR. The records may be used to establish	regulations (e.g.,	regulations (e.g.,	assessments,	
accountability towards you and as evidence for	employees of the	circumventing	notifications to	
asserting, exercising, or defending the legal claims of the $$	supervisory	security settings,	data subjects, etc.).	
controller or a third party (especially in connection with	authority in the	etc.), and similar).		
threats or breaches to security, including the protection	context of			
of human life and health, property, financial or material	consulting or			
damage, interruption of operations, damage to	control activities),			
reputation, leakage of know-how, etc.).	etc.			

#### Obligation to provide personal data,

The obligation to provide personal data varies for each of the processing activities mentioned above. In cases where the processing is based on your voluntary consent, you are not obliged to provide personal data.

However, by not providing them, for example, you may not be able to use our service that is based on consent, or you may not be able to benefit from it.

In cases where the processing is a legal or contractual requirement, or a task that we are obligated to perform in the public interest, you are required to provide us with personal data. Failure to do so may result in a breach of the law or hinder the use of our services, as we will not be able to fulfill our legal/contractual obligations.

The provision of personal data processed within our legitimate interest is mandatory, but you have the right to object to such processing. We will always properly assess your request, but it is possible that, in certain cases, we will not be able to comply with your request, and the provision of personal data will remain mandatory. Similarly, when we carry out profiling, you have the right to request that you are not included in it.

The transfer of personal data to a third country/international organization is not carried out.

**Profiling** is not carried out.

#### **Additional information**

Data from some of the above-mentioned processing operations may be used, where applicable and to the necessary extent, to prove, enforce, or defend our legal claims, or the legal claims of third parties (for example, providing data to law enforcement authorities, executors, lawyers, etc.), within judicial or extrajudicial proceedings, debt collection, etc. Some obtained personal data (e.g., confirmations, records, other documents confirming a particular fact, etc.) may be retained and used as "evidence" for audit purposes, third-party control activities, or for verifying the proper fulfillment of the Controller's obligations under legislative requirements or other requirements (contractual, sectoral, etc.).

## Your rights

As a data subject whose personal data we process, you have the following rights under the GDPR Regulation and the Data Protection Act in connection with the processing of personal data: the right to request access to your personal data being processed, the right to correct (or supplement) personal data, the right to erasure or rectification personal data processing, the right to object to the processing of personal data, the right to the ineffectiveness of automated individual decision-making, including profiling, the right to data portability, the right to withdraw consent to the processing of personal data. If you decide to exercise any of your rights, you can use our request form available in the complete information on the processing of your personal data. If you are not satisfied with our response or believe that we have violated your rights or process your personal data unfairly or unlawfully, you have the right to file a complaint with the supervisory authority, which is the Authority of data protection of the Slovak Republic.