# **Overview of Personal Data Processing for Clients**

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 have shown interest in our services and products or are using our services and products.

### Complete information is available upon request at the e-mail addresses 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, gdpr@sk.tervakoskifilm.sk (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: gdpr@sk.tervakoskifilm.sk, or in writing to the address of the Controller.

Contact details of the Data Protection Officer supervising the processing of personal data: email: dpo3@proenergy.sk.

### **Basic overview of processing activities**

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

| Name and description of processing activity – purpose and legal basis, other important facts   | Categories of data subjects   | Categories of personal data  | Retention<br>period  | Categories of recipients (external)   |
|--|---|--|--|---|
| 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<br>(ordinary – captured<br>on camera footage).   | 7 days.  | (1,5) police, other<br>authorized entity,<br>(2) SBS.   |
| <b>Litigation</b> – 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 natural persons in the position of parties to the proceedings. | • personal data (especially identification, contact, and other personal data obtained or provided during legal 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 | 10 years from<br>the final<br>conclusion of the<br>legal<br>proceedings. | (1a,5) courts,<br>(1b,5) low<br>enforcement<br>authorities,<br>(1c) other<br>authorized entity. |

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|---|---|--|---|---|
|   |   | for criminal offenses<br>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<br>partners of the<br>controller,<br>taxpayers of the<br>controller   | personal data:<br>identification,<br>contact,<br>financial/payment,<br>and other data<br>related to the<br>fulfillment of the<br>contract, accounting,<br>and tax obligations.   | 10 years.   | (1a) tax authority,<br>(1b) auditors,<br>(1c) other<br>authorized entity,<br>(5) contractual<br>partners<br>providing<br>receivables<br>insurance,<br>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. |
| Cookies – if you browse the content of our website, we may process your personal data for the purpose of providing and improving services, developing new services, protecting users, and ensuring the functionality of the site. For data that are not purely technical, we require your voluntary consent to such processing through the use of cookies.  | users of the<br>website of the<br>controller.   | • personal data<br>(standard-statistical)  | After the expiration of the consent period (if the data subject does not renew the consent), a maximum of 2 years.  | (1) other<br>authorized entity.   |
| Technical and organizational measures – in order to ensure your security as well as ours (including your personal data), to demonstrate compliance with our legal obligations, and to assert, exercise, or defend our legal claims or the claims of third parties, we may process records containing your personal data. These may include, for example: -records of your consent to data processing, -records of fulfillment of our information obligations towards you, -records of handling your requests, -records of authorized/assigned accesses and assets and their use, if we have granted/assigned them to you, -records necessary for investigating security incidents and data protection breaches, -records (confirmations) of training provided to you, -records of confidentiality commitments you have made, -records if you were part of our control activities or audits, -other records related to the implementation of adopted technical and organizational measures. Processing is carried out in the legitimate interest of the controller and also as an obligation arising from the GDPR. The records may be used to establish accountability towards you and as evidence for asserting, exercising, or defending the legal claims of the controller or a third party (especially in connection with threats or breaches to security, including the protection of human life and health, | employees, data protection officer, applicants exercising their rights, persons towards whom the controller fulfills obligations arising from the GDPR, persons involved in or addressed in connection with a security incident, processors, other external entities (for example, persons consulted on the issue – consultants, auditors, lawyers), employees of authorities under specific legal regulations (e.g., employees of the supervisory authority in the | • personal data (standard – identification, contact data, which, depending on the nature of the matter being addressed, may be supplemented with other necessary data of various types – e.g., login information, data related to user/offender behavior (e.g., login/logout logs, activities), data necessary to verify the identity of the person exercising their rights, data indicating breaches of internal regulations (e.g., circumventing security settings, etc.), and similar). | According to the chapter "Record Keeping and Archiving" of the Personal Data Protection Policy and the Information Security Policy (most records are kept for 3 years or less, records concerning deletions or containing contracts for 5 years, and some records permanently – e.g., those related to the handling of security incidents, impact assessments, notifications to | (1a,5) data protection officer, supervisory authority of SR, (1b,5) police, the Prosecutor's Office of the Slovak Republic, courts of SR, (1c) other authorized authority.  |

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|---|--|-----------------------------|-----------------------|-------------------------------------|
| property, financial or material damage, interruption of operations, damage to reputation, leakage of know-how, etc.). | context of consulting or control activities), etc. |                             | data subjects, etc.). | CATCHIUN                            |

#### 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.).

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## 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.