

## General Information on the Processing of Personal Data for the Public

*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 information is to provide you with details on what personal data we process, how we handle it, for what purposes we use it, to whom we may disclose it, where you can obtain information about your personal data, and how you can exercise your rights regarding the processing of personal data.

### 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: [gdpr@sk.tervakoskifilm.com](mailto:gdpr@sk.tervakoskifilm.com), or in writing to the address of the Controller. We will strive to process your correspondence as quickly as possible, but we will respond to you within 1 month from the date of its receipt at the latest. In certain cases, we may need additional information to process your request for identification and verification of your identity.

Received questions, feedback, requests for the exercise of your rights, etc., may be forwarded for handling to our external data protection officer, who ensures independent supervision over the proper and secure processing of your personal data. If interested, you can also contact the data protection officer directly at: [dpo3@proenergy.sk](mailto:dpo3@proenergy.sk).

If you are aware of or suspect a security breach affecting personal data, a so-called personal data breach, please inform us immediately by sending an email to: [gdpr@sk.tervakoskifilm.com](mailto:gdpr@sk.tervakoskifilm.com), in person or by mail to our address.

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<b>Reason for updating the original version</b>	-

## Overview of processing activities

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

- A. **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.
- B. **Registry administration** – we may process your personal data in accordance with a legal obligation for the purposes of managing the registry and recording mail. The processing of correspondence data may be carried out within the performance of a contractual relationship or a pre-contractual relationship (contract negotiations, contract performance, accounting management, handling complaints, etc.), in compliance with a legal obligation (e.g., reporting anti-social activities (whistleblowing), handling data subject requests, registry management), or within a legitimate interest (e.g., handling complaints, maintaining records of business partners, processing unexpected/unsolicited communications).
- C. **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.
- D. **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.
- E. **Corporate agenda** – we may process your personal data if you are a shareholder of the controller, for the purpose of fulfilling the controller's corporate obligations. The legal basis is a legal obligation.
- F. **Promotion** – we may process your photographs, video recordings, and other information about you only to the extent and in the manner for which you have granted consent to the processing of personal data. If we have determined that consent is not required (redundant, requiring disproportionate effort, etc.) within the given purpose – for example, if you have participated or will participate in events organized by the controller for a wide audience – we may create and process photographs or other recordings as part of our legitimate interest. These data may be used for positive promotion, as well as for documentation and presentation purposes of the controller's activities. It is in our interest to document the controller's activities and present/promote them in the context of building good internal relations as well as external relations towards the controller and to maintain our good reputation. If you do not wish for your photographs, video recordings, or other related data to be used for documentation, presentation, or promotional purposes, you may exercise your rights (to object to processing or to withdraw consent) through the contacts provided at the beginning of this notice.
- G. **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.
- H. **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:
  - a. records of your consent to data processing,

- b. records of fulfillment of our information obligations towards you,
- c. records of handling your requests,
- d. records of authorized/assigned accesses and assets and their use, if we have granted/assigned them to you,
- e. records necessary for investigating security incidents and data protection breaches,
- f. records (confirmations) of training provided to you,
- g. records of confidentiality commitments you have made,
- h. records if you were part of our control activities or audits,
- i. 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, property, financial or material damage, interruption of operations, damage to reputation, leakage of know-how, etc.).

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.).

## Additional general information

We process your personal data within the above-mentioned processing activities in accordance with the principles relating to processing of personal data, ensuring that we process your personal data to the necessary extent to achieve the specified legal purpose and retain it for the necessary period in accordance with current legal regulations (especially the Archives and Registries Act). Specific deletion periods are listed in the "Details of Processing Activities" section of this information. These periods may be extended in exceptional cases, particularly in the context of proving, exercising, or defending legal claims.

We primarily obtain your personal data from you as the data subject (or from your legal representative). In other cases, if we obtain it from other sources, we transparently inform you of this fact and ensure that this data is obtained legally (for example, with your consent) and is accurate and up-to-date. In case of any changes to your personal data, we request that you report this change.

Access to your personal data is granted to our authorized personnel, who are properly trained on the rules and responsibilities regarding the processing of your personal data and have committed to maintaining the confidentiality of your personal data they come into contact with.

External recipients and other parties, as permitted or required by specific legal regulations or arising from the exercise of public authority, may also have access to your personal data. These primarily include organizations and institutions (including state administration and public authority bodies for the purpose of control and supervision) and may also be contractual partners who act as independent controllers in accordance with specific regulations, or other persons/entities regulated by law. Additionally, we may share your personal data with processors whom we have contractually appointed to process your personal data and who have committed to providing adequate safeguards for the protection of the processed personal data. In certain cases, personal data may be shared within the Terichem group of companies for internal administrative purposes or with another party on the basis of legitimate interest. If you have given us voluntary consent or instructed us to provide the data, your personal data may also be shared with other recipients. Likewise, your personal data may be shared with contractual partners to fulfill the contract between you and the controller.

A specific list of recipients for each processing activity is provided in the "Details of Processing Activities" section of this information.

We hereby inform you, through this information, of any transfer of personal data to third countries or international organizations. In the case of such transfer, this fact is specified in the "Details of Processing Activities" section of this information, along with the safeguards for such transfer, which may include (i) a decision by the Commission that the country or international organization ensures adequate level of protection, (ii) the use of signed standard contractual clauses between the data importer and exporter, (iii) adoption of binding corporate rules, (iv) or application of one of the exceptions for specific situations (such as your explicit consent), and so forth.

These and other specific details regarding the processing of your personal data are provided separately for each processing activity in the "Details of Processing Activities" section of this information.

## Your rights

As a data subject whose personal data we process, you have rights regarding the processing of personal data under the GDPR and the Data Protection Act. Below is an overview of these rights. If you decide to exercise any of your rights, you can use our request form attached, which you can send to the contact provided at the beginning of this information. If you are unsure about your rights or need assistance in completing the request, you can contact our external Data Protection Officer – the contact information is available at the beginning of this information.

### Right of access

You can request information from us about how we process your personal data, including information on:

- the purpose for which we process your personal data,
- the categories of personal data we process,
- with whom we share your personal data,
- how long we retain your personal data or the criteria used to determine this period,
- your rights,
- the source of your personal data (if we did not obtain it directly from you),
- whether the processing involves automated decision-making (known as profiling),
- whether your personal data has been transferred to a country outside the European Union or the European Economic Area, or to an international organization, and if so, how we ensure the protection of your personal data.

All the above information is available in this notice. Upon your request, we will provide you with a copy of the personal data we process about you. For any additional copies you request, we may charge a reasonable fee corresponding to the administrative costs. The right to obtain a copy must not adversely affect the rights and freedoms of others. The controller will provide information about the possibility, the procedure used, any costs, and other detailed information regarding the provision of the copy after receiving your request. If you submitted your request electronically, the information will be provided in a commonly used electronic format unless you request otherwise.

Note: You can easily exercise your right of access by completing the request form – item “D” according to Appendix No. 1 of this notice.

### Right to data portability

You have the right to obtain from us your personal data that you provided for processing based on consent or to fulfill a contract, in a structured, commonly used, and machine-readable format. You also have the right to request the transfer of this data to another controller.

Note: You can easily exercise your right to data portability by completing the request form – item “E” according to Appendix No. 1 of this notice.

### **Right to rectification**

It is important for us to have accurate and complete information about you to avoid errors, unpleasant situations, and undesirable impacts. You not only have the right to the prompt correction of inaccurate personal data or the completion of incomplete personal data that we process about you, but we also ask you to promptly notify us of any changes or additions to your personal data, particularly in cases where you have changed identification/contact information, etc.

Note: You can easily exercise your right to rectification (or completion) of data by completing the request form – items “A” or “B” according to Appendix No. 1 of this notice.

### **Right to erasure (right to be forgotten)**

You have the right to request the deletion of personal data concerning you. We will promptly comply with such a request if any of the following reasons are met:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed, or
- you withdraw the consent on which the processing is based, and there is no other legal basis for the processing, or
- you object to the processing, and there are no overriding legitimate interests for the processing, or you object to processing for direct marketing purposes (including profiling), or
- the personal data have been unlawfully processed, or
- the personal data must be erased to comply with a legal obligation under Union or Member State law to which the controller is subject, or
- the personal data have been collected in relation to the offer of information society services.

For example, you may request deletion because we are processing your personal data unlawfully, such as when we process your personal data for longer than necessary or without justification.

In some cases, however, we may not be able to comply with your request, for example, if the processing of personal data is necessary for exercising the right to freedom of expression and information, to fulfill a legal obligation requiring processing under Union or Member State law to which the controller is subject, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, for reasons of public interest in the area of public health, for archival purposes in the public interest, or for the establishment, exercise, or defense of legal claims.

Note: You can easily exercise your right to erasure of data by completing the request form – item “C” according to Appendix No. 1 of this notice.

### **Right to restriction of processing**

You have the right to request that we restrict the processing of your personal data in any of the following cases:

- you contest the accuracy of the personal data, for a period enabling us to verify the accuracy of the personal data, or
- the processing is unlawful, and you oppose the erasure of the personal data and request the restriction of their use instead, or
- we as the controller no longer need your personal data for the purposes of processing, but you require them for the establishment, exercise, or defense of legal claims, or
- you have objected to processing pending the verification of whether our legitimate interests override yours as the data subject.

If processing has been restricted for the reasons stated above, we may process such personal data (except for storage) only with your consent or for the establishment, exercise, or defense of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or of a Member State.

We will inform you before the restriction of processing by the controller is lifted.

At the same time, we want to assure you that if you exercise your right to rectification, erasure, or restriction of processing of personal data through a request, we will promptly notify each recipient to whom we have disclosed the personal data of this fact (correction, erasure, or restriction of processing), unless it proves impossible or involves disproportionate effort.

Note: You can easily exercise your right to restrict processing of data by completing the request form – item “F” according to Appendix No. 1 of this notice.

### **Right to object to processing**

If you believe we do not have the right to process your personal data, you can object to our processing. This applies in situations where processing is based on legitimate interest pursued by us as the controller or for tasks carried out in the public interest, including objections to profiling. In such cases, we may only continue processing if we can demonstrate compelling legitimate interests that override your interests, rights, and freedoms. However, we may always process your personal data when necessary for the establishment, exercise, or defense of legal claims. If we process your personal data for direct marketing purposes, you have the right to object to such processing at any time.

Note: You can easily exercise your right to object to processing of data by completing the request form – item “G” according to Appendix No. 1 of this notice.

### **Right not to be subject to a decision based solely on automated processing, including profiling.**

In case we engage in profiling, we will inform you in detail as part of specific processing activities. Additionally, we want to assure you that when we state that such processing is not conducted, it means that your personal data are not and will not be used to evaluate or predict your personal aspects related to job performance, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.

If we conduct such processing, you have the right to request not to be subject to profiling. However, in some cases, we may not be able to comply with your request, for example, if the decision is necessary for the conclusion or performance of a contract between the data subject and the controller, or if the decision is authorized by Union law or Member State law and also provides for suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or if the decision is based on the explicit consent of the data subject.

Note: You can easily exercise this right by completing the request form – item “H” according to Appendix No. 1 of this notice.

### **Right to withdraw consent for the processing of personal data**

If you have previously given us consent for the processing of your personal data, you have the right to withdraw this voluntary consent at any time. We will respect your decision and ensure that your personal data are no longer processed for this purpose. However, please note that withdrawing consent does not affect the lawfulness of processing based on consent before its withdrawal (in practice, this means that if your data were disclosed in distributed promotional materials in accordance with the consent given, there will be no removal of these distributed materials, as the consent was valid at the time of distribution).

If you have provided consent to us electronically, you have the right to withdraw that consent using the same electronic means. Alternatively, you can simply write to us at the contact provided at the beginning of this information, stating that you no longer wish us to process your data and that you are withdrawing your consent.

### **Right to lodge a complaint with a supervisory authority**

If you are not satisfied with our response, or if you believe that we have violated your rights or processed your personal data unfairly, unlawfully, etc., you have the option to file a complaint – a proposal to initiate proceedings with the supervisory authority, which is the Authority for Personal Data Protection of the Slovak Republic. More information on the complaint procedure is available at [www.dataprotection.gov.sk](http://www.dataprotection.gov.sk).

## **Security in the processing of your personal data**

We would like to demonstrate that we take the security of your personal data and the protection of your privacy seriously. Therefore, in this section, we provide you with at least basic information about our practices on how we ensure the security of your personal data.

We ensure the security of information, including personal data, by selecting appropriate technical and organizational measures based on international information security standards (especially ISO/IEC 27001:2013, ISO/IEC 27002:2013).

We secure the premises where we process your personal data with an appropriate level of physical protection through mechanical barriers, technical security measures, and organizational measures.

In processing and maintaining the security of personal data, we follow a set of regularly updated policies and procedures with clearly defined and assigned responsibilities.

All processes related to the processing of your personal data are documented and regularly updated. Each new process is properly assessed and approved.

In processing personal data, we consider the risk that may affect you in case of loss of confidentiality, availability, or integrity. Processing operations with higher risk are addressed with more numerous measures to ensure greater protection.

We periodically conduct control and audit activities focused on compliance with established rules and assessing alignment with personal data protection and security requirements. In the event of identified deficiencies, we work diligently to address them.

We utilize the services of an independent external data protection officer who oversees the proper, lawful, and secure processing of personal data within our organization.

Authorized individuals who, within the scope of their job position/function, have access to your personal data are bound by confidentiality regarding personal data. They are properly trained before first processing and subsequently retrained as needed on the requirements and responsibilities of personal data processing.

We use the services of only verified suppliers-processors who have contractually committed to implementing appropriate security measures when processing your personal data.

Authorized individual's access to your personal data is governed by the "need to know" and "need to use" principle.

We have implemented a system for managing security incidents/personal data breaches and ensure the continuity of operations.

We maintain an up-to-date register of primary and supporting assets related to the processing of personal data, which reflects appropriate security measures, including secure deletion/disposal rules, backup procedures, encryption, protection against malicious code, elements of appropriate authentication, pseudonymization, and, where applicable, anonymization. This also includes rules for the use of assets, including their transfer, and many other measures.



## Details of processing activities (FS)

### Filling system: Camera system

#### 1 Purpose and legal basis for processing personal data

The purpose of processing personal data is:

Monitoring of premises through a camera system for the purpose of ensuring security (including crime detection), protecting the life, health, property, and financial interests of the controller, as well as protecting the life, health, and property of individuals present in the monitored area.

Personal data is processed based on:

(1) Article 6 (1) (f) of the GDPR regulation: legitimate interest.

#### 2 Identification of processed personal data of data subjects

Data subjects whose personal data we process:

individuals present in the monitored area.

Scope of personal data we process:

camera recording capturing the data subject (face, activities, etc.).

#### 3 Identification of recipients, or other parties that may access personal data

Category of recipients	Identification of recipients
(1) Institutions, organizations, contractual partners, or other parties allowed access by a specific legal regulation, and/or the exercise of public authority (Article 6(1)(c) and (e) of the Regulation), e.g.: -Act Nr. 171/1993 Coll. On the police force (in particular §76a) -other legal regulation	(1,5) police of SR, other authorized entities, (2) SBS.
(2) Processor under a contract (Article 28 of the GDPR Regulation)	
(3) Other controller, if you have given consent (Article 6(1)(a) of the GDPR Regulation)	
(4) Contractual partner, within the fulfillment of the contract between you and the controller (Article 6(1)(b) of the GDPR Regulation)	
(5) Another party based on legitimate interest (Article 6(1)(f) of the GDPR Regulation)	

#### 4 Transfer of personal data to a Third Country/International Organization

No transfer to a third country or international organization takes place.

#### 5 Identification of the source from which personal data were collected

Directly from the data subject.

#### 6 Retention period of personal data

7 days.

#### 7 Profiling

Not carried out.

#### 8 Obligation to provide personal data

The processing of personal data is carried out to protect the legitimate interests of the controller and third parties. The data subject decides to provide their personal data by entering the monitored premises. By being present in the monitored area, the data subject is automatically recorded on the camera system, without the possibility to choose whether their personal data will or will not be processed.

### Filling system: Registry administration

#### 1. Purpose and legal basis for processing personal data

The purpose of processing personal data is:

registry administration and management of electronic and written correspondence.

Personal data is processed based on:

(1) Article 6 (1) (c) of the GDPR regulation:

- Act No. 395/2002 Coll. on Archives and Registries and on the amendment of certain other Acts,
- Act No. 305/2013 Coll. on the electronic form of exercising the powers of public authorities and on

amendments and supplements to certain laws (e-Government Act) as amended,  
(2) Article 6 (1) (f) of the GDPR regulation: legitimate interest.

## 2. Identification of processed personal data of data subjects

Data subjects whose personal data we process:

natural persons – controllers and processors, authorized persons of controllers and processors, data subjects, other natural persons in the position of parties to the proceedings.

Scope of personal data we process:

personal data – identification data such as title, first name, last name, signature, address, email address, telephone number, and other data of varying sensitivity within the scope of communication pursuant to Act No. 305/2013 Coll., or voluntarily provided within the communication.

## 3. Identification of recipients, or other parties that may access personal data

Category of recipients	Identification of recipients
(1) Institutions, organizations, contractual partners, or other parties allowed access by a specific legal regulation, and/or the exercise of public authority (Article 6(1)(c) and (e) of the Regulation), e.g.: other legal regulation (2) Processor under a contract (Article 28 of the GDPR Regulation) (3) Other controller, if you have given consent (Article 6(1)(a) of the GDPR Regulation) (4) Contractual partner, within the fulfillment of the contract between you and the controller (Article 6(1)(b) of the GDPR Regulation) (5) Another party based on legitimate interest (Article 6(1)(f) of the GDPR Regulation)	(1) Ministry of Interior, other authorized entities, (2) Archiving company, email storage provider.

## 4. Transfer of personal data to a Third Country/International Organization

No transfer to a third country or international organization takes place.

## 5. Identification of the source from which personal data were collected

Directly from the data subject.

## 6. Retention period of personal data

- for a maximum of 10 years (register diary),
- routine and official correspondence for 5 years.

## 7. Profiling

Not carried out.

## 8. Obligation to provide personal data

In cases where the provision of personal data is a legal requirement (registry management, mail recordkeeping, electronic communication with public authorities), processing of personal data is mandatory. The data subject is obliged to provide personal data; failure to do so would constitute a breach of the law. Providing personal data processed under legitimate interests is voluntary – the individual does so at their own discretion. If data is not provided, the controller may not be able to ensure communication processing.

## Filing system: Litigation

### Purpose and legal basis for processing personal data

The purpose of processing personal data is:

Demonstration, assertion, or defense of legal claims within the context of legal proceedings.

Personal data is processed based on:

- (1) Article 6 (1) (f) of the GDPR regulation: legitimate interest,
- (2) Article 6 (1) (c) of the GDPR regulation in particular:
  - Act Nr. 160/2015 Coll. Civil Procedure Code,
  - Act Nr. 161/2015 Coll. Civil Non-Contentious Procedure Code,
  - Act Nr. 301/2005 Coll. Criminal Procedure Code,
  - Act Nr. 162/2015 Coll. Administrative Procedure Code,
- (3) Article 9 (2) (f) of the GDPR regulation: demonstration, assertion, or defense of legal claims,
- (4) Article 10: The processing of data related to the acknowledgment of guilt for criminal offenses and misdemeanors is permitted by the law of the Union or of the Member State.

### Identification of processed personal data of data subjects

Data subjects whose personal data we process:

natural persons – controllers and processors, authorized persons of controllers and processors, data subjects, and other natural persons in the capacity of participants in the proceedings.

Scope of personal data we process:

personal data – identification data (in particular, first and last name, permanent or current address, date of birth, or other identification data – e.g., ID card or passport number), contact data (phone number, email), and, if applicable, other personal data obtained or provided during the proceedings. Depending on the subject matter of the case, sensitive personal data may also be processed (for example, data related to the acknowledgment of guilt for criminal offenses and misdemeanors).

**Identification of recipients, or other parties that may access personal data**

Category of recipients	Identification of recipients
(1) Institutions, organizations, contractual partners, or other parties allowed access by a specific legal regulation, and/or the exercise of public authority (Article 6(1)(c) and (e) of the Regulation), e.g.: <i>-Act Nr. 160/2015 Coll. Civil Procedure Code,</i> <i>-Act Nr. 301/2005 Coll. Criminal Procedure Code,</i> <i>-Act Nr. 171/1993 Coll. on the police force (in particular §76a)</i> <i>-other legal regulation</i> (2) Processor under a contract (Article 28 of the GDPR Regulation) (3) Other controller, if you have given consent (Article 6(1)(a) of the GDPR Regulation) (4) Contractual partner, within the fulfillment of the contract between you and the controller (Article 6(1)(b) of the GDPR Regulation) (5) Another party based on legitimate interest (Article 6(1)(f) of the GDPR Regulation)	(1a,5) courts, (1b,5) law enforcement authorities involved in criminal proceedings, (1c) other authorized entity.

**Transfer of personal data to a Third Country/International Organization**

No transfer to a third country or international organization takes place.

**Identification of the source from which personal data were collected**

Directly from the data subject or their representative, or from other authorized entities governed by specific regulations, e.g., a bailiff, courts.

**Retention period of personal data**

10 years from the final conclusion of the legal proceedings.

**Profiling**

Not carried out.

**Obligation to provide personal data**

The processing of personal data is carried out to protect the legitimate interests of the controller and third parties. If the controller/third party acts in the proceedings as a claimant, providing the data is required based on legitimate interest; without it, the controller or third party (including the data subject) would not be able to demonstrate, assert, or defend their legal claims. If the controller/third party (including the data subject) acts in the proceedings as a respondent, or as a third party obliged to provide cooperation, providing the data is a legal obligation; otherwise, a breach of the law may occur.

**Filing system: whistleblowing****1 Purpose and legal basis for processing personal data**The purpose of processing personal data is:

investigation of reports under Act No. 54/2019 Coll. on the protection of whistleblowers reporting anti-social activities and amending certain laws.

Personal data is processed based on:

(1) Article 6 (1) (c) of the GDPR regulation:

- Act No. 54/2019 Coll. on the protection of whistleblowers reporting anti-social activities and amending certain laws,

(2) Article 9 (2) (g) of the GDPR regulation: significant public interest based on Union law or the law of a Member State

## 2 Identification of processed personal data of data subjects

### Data subjects whose personal data we process:

natural persons - individuals who have filed a report on anti-social activities or requested protection when reporting serious anti-social activities (or their close associates requesting protection) and individuals who are being investigated based on such reports.

### Scope of personal data we process:

personal data provided in the report and data necessary for its investigation (especially common identification personal data about the whistleblower, individuals involved in the breach, details of the report (which may include data of varying sensitivity)).

Anticipated list of personal data: title, first name, last name, date of birth, and residence of the whistleblower; place of work, employer's identification, data about a close associate if they are in an employment relationship with the same employer as the whistleblower or with an employer who is a related party to the whistleblower's employer; and any other data necessary to verify the report.

## 3 Identification of recipients, or other parties that may access personal data

Category of recipients	Identification of recipients
(1) Institutions, organizations, contractual partners, or other parties allowed access by a specific legal regulation, and/or the exercise of public authority (Article 6(1)(c) and (e) of the Regulation), e.g.: <i>-Act No. 54/2019 Coll. on the protection of whistleblowers reporting anti-social activities and amending certain laws,</i> <i>-Act No. 301/2005 Coll. Criminal procedure</i> <i>-Act No. 171/1993 Coll. On the police force (especially §76a)</i> <i>-another legal regulation</i> (2) Processor under a contract (Article 28 of the GDPR Regulation) (3) Other controller, if you have given consent (Article 6(1)(a) of the GDPR Regulation) (4) Contractual partner, within the fulfillment of the contract between you and the controller (Article 6(1)(b) of the GDPR Regulation) (5) Another party based on legitimate interest (Article 6(1)(f) of the GDPR Regulation)	(1) Office for the Protection of Whistleblowers, participants in the proceedings, other competent administrative authorities, Police Force of the Slovak Republic, Prosecutor's Office of the Slovak Republic, courts of the Slovak Republic, other authorized entities.

## 4 Transfer of personal data to a Third Country/International Organization

No transfer to a third country or international organization takes place.

## 5 Identification of the source from which personal data were collected

Directly from data subject (in person, in box, by mail, by phone).

## 6 Retention period of personal data

3 years (from the date of delivery of the submission).

## 7 Profiling

Not carried out.

## 8 Obligation to provide personal data

The data subject provides their personal data voluntarily, in accordance with the law. Failure to provide them will result in the inability to notify the data subject of the outcome of the investigation of the report/notification or to contact them for additional information if needed.

## Filling system: corporate agenda

### 1 Purpose and legal basis for processing personal data

#### The purpose of processing personal data is:

maintenance of a record of partners to fulfill the corporate obligations of the controller in relation to its partners.

#### Personal data is processed based on:

(1) Article 6 (1) (c) of the GDPR regulation:

- Act No. 513/1991 Coll. Commercial Code as amended,
- Act No. 455/1991 Coll. on Trade Licensing (Trade Licensing Act) as amended,

- Act No. 40/1964 Coll. Civil Code as amended,
- Act No. 431/2002 Coll. Accounting Act as amended,
- Act No. 563/2009 Coll. Act on Tax Administration (Tax Procedure Code) and on Amendments and Supplements to Certain Laws as amended,
- Act No. 595/2003 Coll. Income Tax Act as amended,
- Act No. 530/2003 Coll. Act on the Commercial Register and on Amendments and Supplements to Certain Laws as amended,

(2) Article 10: processing of data concerning criminal convictions and offenses is permitted by Union law or by the law of a Member State.

## 2 Identification of processed personal data of data subjects

Data subjects whose personal data we process:

the stakeholders in the controller's company.

Scope of personal data we process:

personal data necessary for fulfilling corporate obligations, particularly including the scope of first name, last name, title, personal identification number, date of birth, place of birth, signature, nationality, citizenship, permanent residence, temporary residence, phone number, email address, legal capacity, dividends and other financial matters, bank account details, information from a certificate of good conduct, and other personal data discovered or provided during the partner's participation in the controller's company.

## 3 Identification of recipients, or other parties that may access personal data

Category of recipients	Identification of recipients
<p>(1) Institutions, organizations, contractual partners, or other parties allowed access by a specific legal regulation, and/or the exercise of public authority (Article 6(1)(c) and (e) of the Regulation), e.g.:</p> <p><i>a-Act No. 586/2003 Coll. on advocacy and on the amendment and supplementation of Act No. 455/1991 Coll. on Trade Licensing (Trade Licensing Act) as amended,</i></p> <p><i>b-Act No. 513/1991 Coll. Commercial Code as amended,</i></p> <p><i>c-Act N. 530/2003 Coll. Act on the Commercial Register and on Amendments and Supplements to Certain Laws as amended,</i></p> <p><i>d-Act No. 595/2003 Coll. Income Tax Act as amended,</i></p> <p><i>e-Act No. 461/2003 Coll. Social Insurance Act as amended,</i></p> <p><i>f-Act No. 43/2004 Coll. on Old-Age Pension Savings and on the Amendment and Supplementation of Certain Laws as Amended,</i></p> <p><i>g-Act No. 580/2004 Coll. on Health Insurance and on the Amendment and Supplementation of Act No. 95/2002 Coll. on Insurance and on the Amendment and Supplementation of Certain Laws as Amended,</i></p> <p><i>h-Act No. 43/2004 Coll. on Old-Age Pension Savings and on the Amendment and Supplementation of Certain Laws as Amended</i></p> <p><i>i-another legal regulation</i></p> <p>(2) Processor under a contract (Article 28 of the GDPR Regulation)</p> <p>(3) Other controller, if you have given consent (Article 6(1)(a) of the GDPR Regulation)</p> <p>(4) Contractual partner, within the fulfillment of the contract between you and the controller (Article 6(1)(b) of the GDPR Regulation)</p> <p>(5) Another party based on legitimate interest (Article 6(1)(f) of the GDPR Regulation)</p>	<p>(1a) Slovak Bar Association,</p> <p>(1b) Commercial Register,</p> <p>(1c) Tax administrator,</p> <p>(1d) Social Insurance Agency,</p> <p>(1e) Health insurance companies,</p> <p>(1f) Pension management companies,</p> <p>(1g) other authorized entities.</p>

## 4 Transfer of personal data to a Third Country/International Organization

No transfer to a third country or international organization takes place.

## 5 Identification of the source from which personal data were collected

Directly from data subject.

## 6 Retention period of personal data

Upon the completion of the purpose in accordance with the act on Archives and Registries.

## 7 Profiling

Not carried out.

**8 Obligation to provide personal data**

The provision of personal data is a legal requirement / contractual requirement, or a requirement necessary for the conclusion of a contract. The data subject is obliged to provide personal data; if the data is not provided, the controller will not be able to fulfill corporate obligations in relation to the partners.

**Filling system: promotion****1 Purpose and legal basis for processing personal data**

The purpose of processing personal data is:

positive promotion of the controller's activities for documentation and presentation purposes (particularly processing of identification data, photographs, other video/audio recordings containing personal data, and reviews).

Personal data is processed based on:

- (1) Article 6 (1) (a) of the GDPR regulation: consent of the data subject,
- (2) Article 6 (1) (f) of the GDPR regulation: legal interest.

**2 Identification of processed personal data of data subjects**

Data subjects whose personal data we process:

employees (including individuals in similar employment relationships) and other natural persons.

Scope of personal data we process:

Personal data of employees and individuals in similar employment relationships – title, first name, last name, job position, photographs, audio recordings, video recordings, and audio-visual recordings.

**3 Identification of recipients, or other parties that may access personal data**

Category of recipients	Identification of recipients
(1) Institutions, organizations, contractual partners, or other parties allowed access by a specific legal regulation, and/or the exercise of public authority (Article 6(1)(c) and (e) of the Regulation), e.g.: <i>-another legal regulation</i> (2) Processor under a contract (Article 28 of the GDPR Regulation) (3) Other controller, if you have given consent (Article 6(1)(a) of the GDPR Regulation) (4) Contractual partner, within the fulfillment of the contract between you and the controller (Article 6(1)(b) of the GDPR Regulation) (5) Another party based on legitimate interest (Article 6(1)(f) of the GDPR Regulation)	(1) other authorized entity, (2) processor CHEMOSVIT, a. s.

**4 Transfer of personal data to a Third Country/International Organization**

No transfer to a third country or international organization takes place.

**5 Identification of the source from which personal data were collected**

Directly from data subjects (or their legal representative) by participating in photography/video recording, or an event that is being documented; by publishing their review.

**6 Retention period of personal data**

During the duration of the employment relationship or upon the completion of the purpose (5 years), does not apply to documents/records with permanent documentary value in accordance with the act on Archives and Registries.

**7 Profiling**

Not carried out.

**8 Obligation to provide personal data**

The data subject (or their legal representative) provides their data voluntarily; the provision is not a legal or contractual requirement. It is in the interest of the controller to process personal data based on voluntary consent; however, if obtaining consent appears objectively impossible (or unreasonable), the controller may process the data within its legitimate interest. If the data subject decides not to grant or withdraw consent for the processing of their personal data, or objects to the processing of their personal data, the controller respects this decision and ensures that the personal data of the data subject is not processed. Additionally, the withdrawal of consent does not affect the lawfulness of the processing based on consent before its withdrawal.

**Filling system: cookies****1 Purpose and legal basis for processing personal data**

The purpose of processing personal data is:

providing and improving services, developing new services, protecting users, and ensuring the functionality of the website.

Personal data is processed based on:

- (1) Art. 6 (1) (a) of the GDPR: consent of the data subject.
- (2) Art. 6 (1) (f) of the GDPR: legitimate interest.

**2 Identification of processed personal data of data subjects**

Data Subjects whose personal data we process:

users of the Controller's website.

Scope of personal data we process:

- personal data (common - statistical).

**3 Identification of recipients or other parties who may have access to personal data**

Category of recipients	Identification of recipients
(1) Institutions, organizations, contractual partners, or other parties to whom access is granted by a specific legal regulation and/or the exercise of public authority (Article 6(1)(c) and (e) of the GDPR), e.g.: -other legal regulation (2) Processor based on a contract (Article 28 of the GDPR) (3) Another controller if you have given consent (Article 6(1)(a) of the GDPR) (4) Contractual partner within the performance of a contract between you and the controller (Article 6(1)(b) of the GDPR) (5) Another party based on legitimate interest (Article 6(1)(f) of the GDPR)	(1) other authorized entity.

**4 Transfer of personal data to a third country/international organization**

The Controller transfers personal data to the third country USA to the organization Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Dublin, Ireland (in accordance with Article 28 of the GDPR) based on a contract for the use of Google Analytics services. More information at:([https://bing.com/search?q=](https://bing.com/search?q=)) The controller is part of the U.S. – EU Privacy Framework adopted by the European Commission.

**5 Identification of source from which personal data was obtained**

Directly from the data subject (through the use of the Controller's website).

**6 Retention period of personal data**

After the consent period expires (if the data subject does not renew consent), a maximum of 2 years.

**7 Profiling**

Not carried out.

**8 Obligation to provide personal data**

The data subject provides their personal data voluntarily, based on consent (provision is not a legal/contractual requirement). If not provided, the Controller will not monitor and evaluate the behavior of the website user to ensure the provision, improvement, and development of new services, user protection, and effective search and advertising.

**Filling system: technical and organizational measures****1 Purpose and legal basis for processing personal data**

The purpose of processing personal data is:

Implementation of technical and organizational measures adopted by the controller to ensure an adequate level of security and maintain compliance with GDPR requirements, which is in the legitimate interest of the controller and also an obligation arising from the GDPR regulation.

Personal data is processed based on:

- (1) Article 6 (1) (f) of the GDPR regulation: legitimate interest,
- (2) Article 6 (1) (c) of the GDPR regulation:
  - GDPR regulation,
  - Act No. 18/2018 Coll. on the protection of personal data and amending and supplementing certain Acts.

## 2 Identification of processed personal data of data subjects

Data subjects whose personal data we process:

employees, data protection officer, applicants for exercising rights, persons towards whom the controller fulfills obligations arising from the GDPR regulation, persons involved in or addressed within a security incident, processors, other external entities (such as consultants, auditors, lawyers if involved in the issue), employees of authorities based on specific legal regulations (e.g., employees of the supervisory authority in the context of consultation or control activities), etc.

Scope of personal data we process:

identification and contact details, which may be supplemented by additional necessary data of various types depending on the nature of the issue being addressed—such as login credentials, data concerning the behavior of the user/ perpetrator (e.g., login and logout logs, activity logs), data required to verify the identity of the person requesting the exercise of a right, data indicating violations of internal regulations (e.g., bypassing security settings, etc.), and so forth.

## 3 Identification of recipients, or other parties that may access personal data

Category of recipients	Identification of recipients
(1) Institutions, organizations, contractual partners, or other parties allowed access by a specific legal regulation, and/or the exercise of public authority (Article 6(1)(c) and (e) of the Regulation), e.g.: <i>a-GDPR regulation,</i> <i>a-Act No.18/2018 Coll. on the protection of personal data and amending and supplementing certain Acts,</i> <i>b- Act No. 301/2005 Coll. Criminal procedure,</i> <i>b- Act No. 171/1993 Coll. On the police force (especially §76a),</i> <i>c-another legal regulation</i> (2) Processor under a contract (Article 28 of the GDPR Regulation) (3) Other controller, if you have given consent (Article 6(1)(a) of the GDPR Regulation) (4) Contractual partner, within the fulfillment of the contract between you and the controller (Article 6(1)(b) of the GDPR Regulation) (5) Another party based on legitimate interest (Article 6(1)(f) of the GDPR Regulation)	(1a,5) Data protection officer, Data protection authority of Slovak republic, (1b,5) Police Force of the Slovak Republic, Prosecutor's Office of the Slovak Republic, courts of the Slovak Republic, (1c) other authorized entity.

## 4 Transfer of personal data to a Third Country/International Organization

No transfer to a third country or international organization takes place.

## 5 Identification of the source from which personal data were collected

Directly from data subject or their legal representative.

## 6 Retention period of personal data

According to the 'Record Keeping, Archiving' section of the Privacy Policy and the Data Security Policy (most records are kept for 3 years or less, records related to deletion or containing contracts are kept for 5 years, and some records are kept permanently—for example, those related to handling security incidents, impact assessments, informing data subjects, etc.

## 7 Profiling

Not carried out.

## 8 Obligation to provide personal data

Data that the data subject voluntarily provides of their own accord—particularly by submitting a request related to exercising their rights—is done voluntarily within the scope of their legitimate interest (provision is not a



legal/contractual requirement). If personal data is not provided, it is possible that the controller will not be able to process their request.

The data subject is required to provide their personal data that the controller requests in connection with the implementation of the controller's technical and organizational measures (e.g., confirmation of acknowledgment, training, assignment of access rights and assets, data on their proper use, etc.), which are in the legitimate interest of and also a legal obligation for the controller. Failure to provide personal data may lead to consequences for the data subject, such as denial of access to personal data, resources, or services of the controller, consequences within an employment relationship (for employees) or other relationship with the controller. In certain cases, the data subject's failure to provide data could jeopardize the safety, property, health, life, financial, and other interests of the controller or third parties, potentially leading to legal violations.



## Annexes

### Annex No. 1

[●] (header – title, first name, last name, address of the applicant)

[●] (controller's name)

[●] (address)

[●] (company identification number)

In [●], on [●]

#### **Request Regarding the Exercise of Rights in Relation to Personal Data Processing**

Dear [●] (data protection officer, company, controller),

in accordance with the relevant data protection laws, I, as the data subject, hereby

**request**

[●] (please indicate one or more of the options listed below (A-H) according to the type of your request. Delete any that are not applicable)

**(A) - right to rectification of personal data** that you process about me in connection with [●] (specify the nature of the relationship with the controller or other circumstances under which the personal data may be processed, which will help the controller identify you)

Details of the request:

Due to the processing of incorrect personal data, I request that you correct it as follows:

Incorrect personal data:

[●] (specify the incorrect personal data, if known to you)

Correct personal data:

[●] (provide the correct – current personal data)

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**(B) - the completion of the personal data** that you process about me in connection with [●] (please specify your relationship with the data controller or other circumstances under which personal data may be processed, which may help the data controller identify you).

Details of the request:

Due to the processing of incomplete personal data, I request that they be completed as follows:

Incomplete personal data:

**[●]** (specify the incomplete personal data, if known to you)

Completed personal data:

**[●]** (provide the completed personal data)

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**(C) - the erasure of the personal data that you process about me in connection with [●] ([●])** (please specify your relationship with the data controller or other circumstances under which personal data may be processed, which may help the data controller identify you).

Details of the request:

I request the erasure of personal data for the following reason:

(select one or more of the options that apply to your request)

- ☐ the personal data are no longer necessary for the purposes for which they were collected and processed
- ☐ the withdrawal of my consent to the processing of personal data
- ☐ based on my objection to the processing of personal data, it has been determined that the data controller's legitimate interests for processing do not outweigh my interests, rights, and freedoms
- ☐ my objection to the processing of my personal data for direct marketing purposes (including profiling)
- ☐ my personal data were processed unlawfully
- ☐ personal data must be erased based on a specific legal regulation
- ☐ personal data were obtained in connection with the offering of information society services to a child

Justification:

**[●]** (provide a more detailed description of the situation)

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**(D) - a copy of the personal data that you process about me in connection with [●]** (please specify your relationship with the data controller or other circumstances under which personal data may be processed, which may help the data controller identify you)

Details of the request:

If you confirm that you hold personal data relating to me, I request access to this data by sending a copy **[●]** (specify the requested form of providing the personal data, e.g., in electronic format to an email address/in printed format to an address).

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**(E) - the provision of a copy of personal data to another data controller** that you process about me in connection with **[●]** (please specify your relationship with the data controller or other circumstances under which personal data may be processed, which may help the data controller identify you)

Details of the request:

The data controller to whom the personal data will be transferred: **[●]** (provide the identification details of the data controller)

Form and location of data provision: **[●]** (specify the format and delivery location for the transferred data, e.g., in electronic format to an email address/in printed format to an address)

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**(F) - the restriction of the processing of personal data** that you process about me in connection with [●] *(please specify your relationship with the data controller or other circumstances under which personal data may be processed, which may help the data controller identify you)*

Details of the request:

I request the restriction of processing for the following reason:

*(select one or more of the options that apply to your request)*

- ☐ the personal data you process about me are incorrect, and I request that processing be restricted while the accuracy of my personal data is verified
- ☐ the processing of my personal data is unlawful, but I object to the erasure of the personal data and instead consider restricting their use to be sufficient
- ☐ I need my personal data to establish, exercise, or defend legal claims
- ☐ based on my objection to the processing of personal data, I request that processing be restricted for the entire duration of verifying whether the data controller's legitimate interests for processing outweigh my legitimate interests

Justification:

[●] *(provide a more detailed description of the situation)*

Requested form of restriction on processing:

[●] *(specify if you have a request for a specific duration of restriction, e.g., for the time necessary to defend my legal claims, after which I will inform you of the end/for the duration of verifying the request specified above/other period)*

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**(G) - that my personal data be not processed (I object to the processing of personal data) that you process about me in connection with [●]** *(please specify your relationship with the data controller or other circumstances under which personal data may be processed, which may help the data controller identify you)*

Details of the request:

I object to the processing of my personal data carried out on the basis of:

*(select one or more of the options that apply to your request)*

- ☐ the public interest or in the exercise of official authority vested in the data controller
- ☐ the legitimate interest of the data controller or a third party

Justification:

[●] *(provide a more detailed description of the situation, e.g., I do not wish for my personal data to be processed for direct marketing purposes (including profiling))*

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**(H) - that I should not be subject to a decision based solely on automated processing of personal data, including profiling,** that you process about me in connection with [●] *(please specify your relationship with the data controller or other circumstances under which personal data may be processed, which may help the data controller identify you)*

Details of the request:

**[●]** *(provide specific requests and justification for the request, e.g., since the aforementioned processing may have adverse effects on me, such as [●], I request that my data be processed in a manner other than solely through automated means)*

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If you have any questions or uncertainties, please contact me at **[●]** *(provide contact details, such as email, phone number, or address, etc.)*.

Thank you in advance for handling the request.

Best regards,

\_\_\_\_\_  
**[●]** *(name, surname, and signature of the data subject)*