

## Personal Data Processing Policy

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**Controller: Medusa Group**

**Medusa Group shall mean:**

- **PRESTO, s. r. o., with registered office at Einsteinova 23, Bratislava 851 01, ID: 35854197**
- **GASTRONIX, s.r.o., with registered office at Einsteinova 23, Bratislava 851 01, ID: 35849592**
- **MEDUSA GROUP, s. r. o., with registered office at Einsteinova 23, Bratislava 851 01, ID: 45301883**
- **MEDUSA RESORTS, s. r. o., with registered office at Einsteinova 23, Bratislava 851 01, ID: 45581151**
- **MEDUSA SERVICES, s. r. o., with registered office at Einsteinova 23, Bratislava 851 01, ID: 47952491**
- **MEDUSA SYSTEMS, s. r. o., with registered office at Einsteinova 23, Bratislava 851 01, ID: 47783851**
- **X WEAR BETA, s. r. o., with registered office at Einsteinova 23, Bratislava 851 01, ID: 44716851**
- **X WEAR, s.r.o., with registered office at Einsteinova 23, Bratislava 851 01, ID: 35847999**

treats your personal data responsibly and thus provides you, as a data subject (natural person whose personal data is being processed) with the following information under 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) and Act No. 18/2018 Coll. on the Personal Data Protection and on amendments and supplements to certain acts (hereinafter the "Act").

**Within the meaning of Art. 24 of GDPR and Sec. 31 of the Act, the Controller introduced adequate technical, organizational, personnel and security measures and guarantees, taking into account in particular:**

- principles for the processing of personal data which are legality, fairness and transparency, limitation and compatibility of the purposes of the processing of personal data, furthermore the minimization of personal data, its pseudonymisation and encryption, as well as integrity, confidentiality and availability;
- principles of necessity and proportionality (includes also scope and quantity of personal data processed, retention time and access to personal data of data subject) of the processing of personal data with regards to the purpose of the processing operation;
- nature, scope, context and purpose of the processing operation;
- resilience and renewal of the systems for the processing of personal data;
- advice of authorized persons of the Controller;
- adoption of measures for immediate determination of breaching of personal data protection and forthwith notification to the supervisory authority and responsible person;
- adoption of measures to ensure rectification or erasure of incorrect personal data or other implementation of the rights of data subject;
- risks with various probability and severity for the rights and freedoms of natural persons (in particular random or illegal destruction of personal data, loss or change of personal data, misuse of personal data - unauthorized access or provision, assessment of risks with regards to origin, nature, probability and severity of risks with regards to processing and for identification of the best processes for risk mitigation).

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### PROCESSING OPERATIONS OF THE CONTROLLER

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#### **Wages and Human Resources**

**Purpose of the processing of personal data** - maintaining records of wages and human resources of employees in an employment relationship, civil servant relationship or other similar relationship (e.g. agreements on work performed outside employment relationship) with an employer being the Controller,

**Categories of personal data processed** - name, surname, maiden name, previous surname, title, permanent/temporary residence, date of birth, place of birth, birth number, nationality, citizenship, sex, bank account of a natural person,

marital status, education, practice , ID card number, signature, basic salary, personal evaluation, job and functional status, work commencement date , salary category, place of work, e-mail address, telephone number, data for statistics, name of health insurance company, data from supplementary pension savings contract, SDS saver data, hours worked, amounts affected by enforcement by a court or administrative authority, pecuniary penalties and fines, as well as compensation imposed on an employee by enforceable decision of competent authorities, data on incapacity for work, data on important personal obstacles to work, data on changed capability for work, degree of disability, data from employment confirmation, data on employee registration in the register of unemployed citizens, data on maternity and parental leave, data on pension, type of pension, annual total of paid pension, capacity to legal acts, data from integrity document, personal data processed on confirmations, certificates of passed exams and educational activities, data in CV or others, if required by a special legal regulation or other legal basis of the processing of personal data.

**Special categories of personal data processed** - special categories of personal data are not processed.

**Categories of data subjects** - employees of the Controller, former employees of the Controller, job seekers, family members of employees of the Controller.

**Provision of personal data to third parties** - courts, law enforcement authorities, health insurance companies, Social Insurance Company, supplementary pension savings banks, pension management companies, tax authorities, enforcement bodies, government and public authorities for control and supervision (e.g. labour inspectorate), Central Office of Labour, Social Affairs and Family of the Slovak Republic, employee representatives, inspectors of the Office for Personal Data Protection of the Slovak Republic, another authorized entity in accordance with the Personal Data Protection Act or other special legislation.

**Cross-border transfer of personal data** - not performed.

**Information on the existence of automated decision making, including profiling** - not performed.

**Time limits for the erasure of personal data**

**Obligations of an employer towards a health insurance company** - 10 years

**Obligations of an employer towards the Social Insurance Company** - 10 years

**Tax obligations** - 10 years

**Enforcements** - 20 years

**Records of attendance, leaves** - 5 years

**Employer's wage policy** - 70 years

**Obligations of an employer with regards to employment relationship or similar relationship** - 70 years

**Legal basis for the processing of personal data** - Council Regulation (EEC) No. 311/76 on the compilation of statistics on foreign workers, Council Regulation (EEC) No. 1612/68 on freedom of movement for workers within the Community, Act No. 18/2018 Coll. on the Protection of Personal Data and on amendments to certain acts, Act No. 311/2001 Coll. the Labour Code, Act No. 552/2003 Coll. on the Performance of Works in the Public Interest, as amended,

Act No. 553/2003 Coll. on Remuneration of Certain Employees in the Performance of Work in the Public Interest and on amendments to certain acts, as amended, Act No. 595/2003 Coll. on Income Tax as amended, Act No. 563/2009 Coll. on Tax Administration (Tax Code) and on amendments to certain acts, as amended, Act No. 461/2003 Coll. on Social Insurance, as amended, Act No. 600/2003 Coll. on Child Benefit and on the amendment of Act No. 461/2003 Coll. on Social Insurance, as amended, Act No. 462/2003 Coll. on Compensation of Incomes in Case of Temporary Incapacity for Work of an Employee and on amendments to certain acts, as amended, Act No. 580/2004 Coll. on Health Insurance and on amendments to certain acts, as amended, Act No. 650/2004 Coll. on Supplementary Pension Savings, as amended, Act No. 448/2008 Coll. on Social Services, as amended, Act No. 5/2004 Coll. on Employment Services, as amended, Act No. 82/2005 Coll. on Illegal Work and Illegal Employment, as amended, Act No. 152/1994 Coll. on the Social Fund and on the amendment of Act No. 286/1992 Coll. on Income Taxes, as amended, Act No.

43/2004 Coll. on Retirement Pension Savings, Act No. 570/2005 Coll. on Conscription, Act No. 42/1994 Coll. on Civil Protection of the Population, as amended, Act No. 314/2001 Coll. on Fire Protection, Act No. 124/2006 Coll. on Safety and Health Protection at Work, Act No. 355/2007 Coll. on Protection, Promotion and Development of Public Health and related legislation, Act No. 179/2011 Coll. on Economic Mobilization and on amendment of Act No. 387/2002 Coll. on State Management in Crisis Situations Outside the Time of War and State of War, as amended, Act No. 215/2004 Coll. on Protection of Classified Information and on amendments to certain acts, as amended, Act No. 233/1995 Coll. on Enforcement Bodies and Enforcement (the Enforcement Code), Act No. 663/2007 Coll. on Minimum Wage, Act No. 317/2009 Coll. on Pedagogical and Professional Staff and on amendments to certain acts, Act No. 283/2002 Coll. on Travel Expenses.

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## **Accounting Documents**

**Purpose of the processing of personal data** - processing orders, received and sent invoices, contact with banks, keeping treasury, providing cash income and expenses, warehouse management, inventory of fixed assets (including automatic depreciation) and small property, single/double bookkeeping of the organization.

**Categories of personal data processed** - title, name, surname, address, telephone number, e-mail address, date of birth, type and number of ID document, vehicle reg. number, bank account number or other if required by a special legal regulation or other basis for the processing of personal data.

**Special categories of personal data processed** - special categories of personal data are not processed.

**Categories of data subjects** - employees of the Controller, former employees of the Controller, cooperating entities of the Controller (e.g. suppliers or sub-contractors)

**Provision of personal data to third parties** - court, law enforcement authorities, health insurance companies, Social Insurance Company, tax office, inspectors of the Office for Personal Data Protection of the Slovak Republic, another authorized entity in accordance with the Personal Data Protection Act or other special legislation.

**Cross-border transfer of personal data** - not performed.

**Information on the existence of automated decision making, including profiling** - not performed.

## **Time limits for the erasure of personal data**

**Invoice books** - 10 years

**List of receivables and liabilities** - 10 years

**Invoices** - 10 years

**Treasury agenda** - 10 years

**Accounting documents** - 10 years

**Bank statements** - 10 years

**Ledgers** - 20 years

**Closing accounts** - 10 years

**Accounting statements** - 10 years

**Annual tax return** - 10 years

**Legal basis for the processing of personal data** - Act No. 431/2002 Coll. on Accounting, as amended, Act No. 222/2004 Coll. on Value Added Tax, as amended, Act No. 18/2018 Coll. on the Protection of Personal Data and on amendments to certain acts, Act No. 145/1995 Coll. on Administrative Fees, as amended, Act No. 40/1964 Coll. the

Civil Code, as amended, Act No. 152/1994 Coll. on the Social Fund and on the amendment of Act No. 286/1992 Coll. on Income Taxes, as amended, Act No. 311/2001 Coll. the Labour Code, Act No. 400/2009 Coll. on the Civil Service and on amendments to certain acts, as amended, Act No. 513/1991 Coll. the Commercial Code, as amended, Act No. 583/2004 Coll. on Budgetary Rules of Territorial Self-Government and on amendments to certain acts, Act No. 283/2002 Coll. on Travel Expenses, Act No. 55/2017 Coll. on the Civil Service and on amendments to certain acts,

Act No. 595/2003 Coll. on Income Tax, as amended, Act No. 582/2004 Coll. on Local Taxes and Local Fees for Municipal Waste and Small Construction Waste, as amended.

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## **Health and Safety at Work, Occupational Health Service, Fire Protection**

**Purpose of the processing of personal data** - obligations of the Controller as employer related to employment relationship, civil servant relationship or similar relationship providing professional and advisory services in the field of protection and promotion of health and safety at work, fire protection and occupational health service.

**Categories of personal data processed** - title, name, surname, residence, registered office, signature, specialization, department, or other, if required by a special legal regulation or other legal basis of the processing of personal data.

**Special categories of personal data processed** - health condition.

**Categories of data subjects** - employees of the Controller, occupational health service providers, security technicians, fire protection technicians.

**Provision of personal data to third parties** - courts, law enforcement authorities, Social Insurance Company, labour inspectorate, other authorized entity in accordance with the Personal Data Protection Act or other special legislation.

**Cross-border transfer of personal data** - not performed.

**Information on the existence of automated decision making, including profiling** - not performed.

**Time limits for the erasure of personal data**

**Recording occupational injuries** - 5 years

**Obligations of employer in terms of health and safety protection** - 5 years after an obligation terminates or ceases to exist

**Documentation of training or re-training in health and safety at work** - 5 years

**Legal basis for the processing of personal data** - Art. 9(2)(b) of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data,

Decree of the Ministry of Labour, Social Affairs and Family of the Slovak Republic No.147/2013 laying down details to ensure safety and health protection in construction works and related works and details of professional competence for performing certain work activities, Decree of the Ministry of Labour, Social Affairs and Family of the Slovak Republic No. 356/2007 laying down details on the requirements and scope of educational and training activities, on project of education and training, keeping the prescribed documentation and verifying the knowledge of participants in educational and training activities, Decree of the Ministry of Labour, Social Affairs and Family of the Slovak Republic No. 45/2010 laying down details to ensure safety and health protection in agricultural work, Decree of the Ministry of Labour, Social Affairs and Family of the Slovak Republic No. 46/2010 laying down details to ensure safety and health protection at forest work and details of professional competence for the performance of certain work activities and for the operation of certain technical equipment,

Decree of the Ministry of Labour, Social Affairs and Family of the Slovak Republic No. 500/2006 Coll. laying down

the sample record of registered work injury, Decree of the Ministry of Labor, Social Affairs and Family of the Slovak Republic No. 508/2006 laying down details to ensure safety and health protection at work with pressure, lifting, electric and gas technical equipment and laying down technical equipment, which are considered as dedicated technical equipment, Act No. 124/2006 Coll. on Health and Safety at Work and on amendments to certain acts, Act No. 311/2001 Coll. the Labour Code, Act No. 355/2007 Coll. on the Protection, Promotion and Development of Public Health, as amended.

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## **Records of Job Seekers**

**Purpose of the processing of personal data** - keeping records of job seekers at the Controller.

**Categories of personal data processed** - title, name, surname, permanent, temporary residence, date of birth, telephone number, education, experience, e-mail address, other data provided in CV, cover letter and job application.

**Special categories of personal data processed** - special categories of personal data are not processed.

**Categories of data subjects** - natural persons applying for a job at the Controller.

**Provision of personal data to third parties** - courts, law enforcement authorities, Central Office of Labour, Social Affairs and Family of the Slovak Republic, other authorized entity in accordance with the Personal Data Protection Act or other special legislation.

**Cross-border transfer of personal data** - not performed.

**Information on the existence of automated decision making, including profiling** - not performed.

**Time limits for the erasure of personal data**

**Sending CV for any suitable vacancy** - 3 years

**Sending CV for a particular vacancy** - 6 months after termination of a selection procedure. When an employment or other similar contract is concluded, it will be then used for employment and legal purposes.

**Legal basis for the processing of personal data** - Art.6(1)(a) of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, Sec.13(1)(a) of Act No. 18/2018 Coll. on the Protection of Personal Data and on amendments to certain acts, Act No. 311/2001 Coll. the Labour Code, Act No. 5/2004 Coll. on Employment Services and on amendments to certain acts

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## **Records of received and sent mails (paper and electronic form)**

**Purpose of the processing of personal data** - keeping records of received and sent mails (requests, complaints, inquiries, letters, etc.) in paper and electronic form.

**Categories of personal data processed** - name, surname, title, residence, date of birth, email address, account number, signature, guaranteed electronic signature and other data that may be contained in received and sent mails.

**Special categories of personal data processed** - special categories of personal data are not processed.

**Categories of data subjects** - natural persons whose data may be contained in received and sent mails.

**Provision of personal data to third parties** - courts, law enforcement authorities, other authorized entity in accordance with the Personal Data Protection Act or other special legislation.



**Cross-border transfer of personal data** - not performed

**Information on the existence of automated decision making, including profiling** - not performed.

**Time limits for the erasure of personal data**

**Correspondence** - 3 years

**Legal basis for the processing of personal data** - Art.6(1)(a) of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, Sec.13(1)(a) of Act No. 18/2018 Coll. on the Protection of Personal Data and on amendments to certain acts, Act No. 272/2016 Coll. on Trusted Services for Electronic Transactions in the Internal Market and on Amendments to Certain Acts (the Trusted Services Act), Act No. 305/2013 Coll. on the Electronic Form of the Exercise of Powers of Public Authorities and on amendments to certain acts (the e-Government Act).

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## **Registration of contracts concluded by the Controller**

**Purpose of the processing of personal data** - registration of contracts concluded by the Controller

**Categories of personal data processed** - name, surname, title, date of birth, birth number, permanent or temporary residence, account number, bank name, ID card number and other data related to subject of a contract concluded by the Controller.

**Special categories of personal data processed** - special categories of personal data are not processed.

**Categories of data subjects** - natural persons whose data is contained in a concluded contract.

**Provision of personal data to third parties** - courts, law enforcement authorities, inspectors of the Office for Personal Data Protection of the Slovak Republic, other authorized entity in accordance with the Personal Data Protection Act or other special legislation.

**Cross-border transfer of personal data** - not performed.

**Information on the existence of automated decision making, including profiling** - not performed.

**Time limits for the erasure of personal data**

**Property legal contracts** - 50 years

**Legal basis for the processing of personal data** - Art.6(1)(b) of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, Act No. 40/1964 Coll. the Civil Code, Act No. 513/1991 Coll. the Commercial Code, as amended, Act No. 311/2001 Coll. the Labour Code.

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## **Photography and Video**

**Purpose of the processing of personal data** - creating an image to transmit it on a paper or other carrier.

**Categories of personal data processed** - distinctive features that make up the physical identity of a person as a unique human being, and other data specifying a natural person depicted on photography.

**Special categories of personal data processed** - special categories of personal data are not processed.

**Categories of data subjects** - natural persons who are depicted on photography.

**Provision of personal data to third parties** - court, law enforcement authorities, other authorized entity in accordance with the Personal Data Protection Act or other special legislation.

**Cross-border transfer of personal data** - not performed.

**Information on the existence of automated decision making, including profiling** - not performed.

**Time limits for the erasure of personal data**

**Photography and video record** - 5 years

**Legal basis for the processing of personal data** - Sec.11-16 of Act No. 40/1964 Coll. the Civil Code, Act No. 18/2018 Coll. on Personal Data and on amendments to certain acts.

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### **Employee Control Mechanism**

**Purpose of the processing of personal data** - monitoring employees at their workplace

**Categories of personal data processed** - name, surname, title, address, date of birth, birth number, temporary residence, e-mail address, telephone number, IP address, localization data.

**Special categories of personal data processed** - special categories of personal data are not processed.

**Categories of data subjects** - employees.

**Provision of personal data to third parties** - court, law enforcement authorities, other authorized entity in accordance with the Personal Data Protection Act or other special legislation.

**Cross-border transfer of personal data** - not performed.

**Information on the existence of automated decision making, including profiling** - not performed.

**Time limits for the erasure of personal data**

**Monitoring employees at their workplace under Sec.13(4) of the Labour Code** - 2 years

**Legal basis for the processing of personal data** - Sec.13(4) and (7) of Act No. 311/2001 Coll. the Labour Code, as amended;

Sec. 57(2) of Act No. 351/2011 Coll. on Electronic Communications, as amended.

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### **Loyalty Program**

**Purpose of the processing of personal data** - granting discounts, bonuses and loyalty programs

**Categories of personal data processed** - title, name, surname, signature, date of birth

**Special categories of personal data processed** - special categories of personal data are not processed.

**Categories of data subjects** - Medusa card holders

**Provision of personal data to third parties** - court, law enforcement authorities, Ministry of Interior of the Slovak Republic, Slovenská pošta, a.s., other authorized entity in accordance with the Personal Data Protection Act or other special legislation.

**Cross-border transfer of personal data** - not performed.

**Information on the existence of automated decision making, including profiling** - not performed.

**Time limits for the erasure of personal data**

**Medusa card** – 5 years

**Legal basis for the processing of personal data** - Art. 6(1)(a) of the General Data Protection Regulation

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## **Marketing**

**Purpose of the processing of personal data** - keeping records for sending newsletter with Medusa Group news

**Categories of personal data processed** - title, name, surname, signature, date of birth

**Special categories of personal data processed** - special categories of personal data are not processed.

**Categories of data subjects** - natural persons subscribed for regular Medusa Group news

**Provision of personal data to third parties** - court, law enforcement authorities, Ministry of Interior of the Slovak Republic, Slovenská pošta, a.s., other authorized entity in accordance with the Personal Data Protection Act or other special legislation.

**Cross-border transfer of personal data** - not performed.

**Information on the existence of automated decision making, including profiling** - not performed.

**Time limits for the erasure of personal data**

**Newsletter** - 5 years

**Legal basis for the processing of personal data** - Art. 6(1)(a) of the General Data Protection Regulation

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## **Contact / booking form**

**Purpose of the processing of personal data** - replying to your inquiry/request

**Categories of personal data processed** - name, surname, telephone number, e-mail

**Special categories of personal data processed** - special categories of personal data are not processed.

**Categories of data subjects** - a natural person filling in the form



**Provision of personal data to third parties** - court, law enforcement authorities, Ministry of Interior of the Slovak Republic, Slovenská pošta, a.s., other authorized entity in accordance with the Personal Data Protection Act or other special legislation.

**Cross-border transfer of personal data** - not performed.

**Information on the existence of automated decision making, including profiling** - not performed.

**Time limits for the erasure of personal data**

**Contact form** - 1 year

**Legal basis for the processing of personal data** - Art. 6(1)(f) of the General Data Protection Regulation



M E D U S A

## CAMERA INFORMATION SYSTEM

As using the camera system causes the processing of personal data, we would like to provide you, as a data subject, with information on your rights and terms of the processing of your personal data. At the same time, we would like to assure you that that protection of your data is important to our community, and we have security measures in place for us to comply with GDPR.

### **Legal basis and purpose for the processing of personal data:**

- Art.6(1)(f) of 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) - purpose: protection of property of the Controller;

- Art.6(1)(f) of 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) in conjunction with Sec.13(4) of Act No. 311/2001 Coll. the Labour Code - purpose: monitoring employees at their workplace.

Each entry to the monitored area is labelled with a pictogram and indication that the area is monitored by the camera system.

### **Categories of recipients:**

Recipient in a third country or international organization: none

Recipient in EU and EEA member state: none

Public authority, which processes personal data on the basis of the Act: **the Police Force of the Slovak Republic and the Public Prosecutor's Office, court.**

**Data transfers:** data transfer does not take place.

**Retention time:** If the issued record is not used for the purposes of criminal proceedings or infringement proceedings, the record will be automatically destroyed in the information system within 15 days of the day following the day on which the record was created.

The Controller does not make automated decision-making including profiling referred to in Art.22(1) to (4) of GDPR.

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## **Rights of Data Subject**

Under 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) and Act No. 18/2018 Coll. on the Protection of Personal Data and on amendments and supplements to certain acts (hereinafter the “Act”) you, as a data subject have guaranteed the following rights:

### **a) the right of the Data Subject to access personal data containing:**

- the right to obtain a confirmation from the Controller whether data concerning the Data Subject is being processed;
- if personal data of the Data Subject is being processed, the right to access processed personal data and the right to obtain such data;
  - information on purposes for processing;
  - information on categories of personal data concerned;
  - information on recipients or categories of recipients to whom personal data is or will be provided, in particular for recipients in third countries or international organizations;
  - if possible, information on assumed time for retention of personal data or if not possible, information on criteria to determine the same;
  - information on existence of the right to require the Controller to rectify personal data related to the Data Subject or erasure or restriction of its processing and on existence of the right to object such processing;
  - information on the right to file a complaint to the supervisory body;
  - if personal data was not collected from the Data Subject then any available information concerning source thereof;
  - information on existence of the automated decision-making including profiling provided in Art.22(1) to (4) of the Regulation and in such cases at least meaningful information on procedure used, as well as on meaning and assumed consequences of such processing of personal data for the Data Subject;
- The right to be informed on adequate guarantees under Art.46 of the Regulation related to transfer of personal data if personal data is transferred to a third country or international organization;
- The right to provision of a copy of personal data being processed, provided, however, that the right to provide a copy of personal data being processed must not adversely affect the rights and freedoms of others;

**The right of the Data Subject to access personal data** in essence means that the Data Subject has the right to obtain confirmation from us whether personal data concerning him/her is being processed and if so, he/she has the right to access such personal data. We will provide a copy of personal data being processed upon request of the Data Subject. We may charge a reasonable fee corresponding to administrative costs for any other copies required by the Data Subject. Where the Data Subject has made a request by electronic means, the information shall be provided in a commonly used electronic form, unless the Data Subject has requested otherwise. Information must be provided immediately, within 1 month at the latest. We reserve the right to extend the time for processing a request by another 2 months if a request is complicated or frequent. However, we are obliged to inform the Data Subject a reason for extension of the processing time within 1 month. We are entitled to a fee corresponding to costs or refuse a request in case of unjustified or too frequent request. We need to explain the reason for refusal and the right of the Data Subject to address the supervisory body with complaint.

### **b) the right of the Data Subject to rectify personal data containing:**

- The right to have immediately rectified incorrect data related to the Data Subject by the Controller.
- the right to have completed incomplete personal data of the Data Subject even by provision of complementary declaration of the Data Subject;

**The right of the Data Subject to rectify personal data** means that you may ask us anytime to rectify or complete your personal data if inaccurate or incomplete. The Data Subject has the right to have completed incomplete personal data even by provision of a complementary declaration.

**c) the right of the Data Subject to erasure of personal data (the right “to be forgotten”) containing:**

- the right to obtain, without undue delay, the erasure of personal data relating to the Data Subject, if any of the following reasons are fulfilled:
  - personal data is no longer necessary for the purposes for which it was obtained or otherwise processed;
  - the Data Subject withdraws the consent under which the processing is carried out, provided that there is no other legal basis for the processing of personal data;
  - the Data Subject objects to the processing of personal data under Art. 21(1) of the Regulation and no legitimate grounds for processing personal data prevail or the Data Subject objects to the processing of personal data pursuant to Art. 21(2) of the Regulation;
  - personal data was processed illegally;
  - personal data must be erased to meet a legal obligation under European Union law or the law of a member state to which the Controller is subject;
  - personal data was collected in relation to the offer of services of information society under Art.8(1) of the Regulation;
- the right that the Controller, who had disclosed personal data of the Data Subject, having regard for the technology available and the cost of implementing the appropriate measures, including technical measures informs the other controllers who carry out the processing of personal data that the Data Subject asks to erase all references to such personal data, a copy or replicas thereof;

while it is true that the right to erasure of personal data with the contents of rights under Art. 17(1) and (2) of the Regulation [that is with the contents of the rights under Point J(c)(i) and (ii) of this document ] does not arise where the processing of personal data is necessary:

1. to apply the right for freedom of speech and for information;
2. to fulfil a legal obligation requiring processing under European Union law or the law of a member state to which the Controller is subject, or to perform a task carried out in the public interest or in the exercise of official authority entrusted to the Controller;
3. due to public interest in the field of public health in accordance with Art.9(2)(h) and (i) of the Regulation, and Art.9(3) of the Regulation;
4. for archiving in the public interest, for scientific and historical research or statistical purposes under Art.89(1) of the Regulation if it is probable that the right granted in Art.17(1) of the Regulation makes it impossible or seriously difficult to achieve the goals of such processing of personal data; or
5. to prove, apply and defend legal claims;

**The right of the Data Subject to erasure of personal data** means that we have to erase your personal data if (i) no longer needed for purposes for which it was collected or otherwise processed, (ii) processing is illegal, (iii) you object to processing and there are no prevailing justified reasons for processing or (iv) we are obliged to do by any legal obligation.

**d) the right of the Data Subject to restrict the processing of personal data containing:**

- the right to have the Controller restricted the processing of personal data if one of the following cases occurs:
  - the Data Subject challenges the lawfulness of personal data during a period allowing the Controller to verify correctness of personal data;

- the processing of personal data is illegal and the Data Subject challenges the erasure of personal data and requests restriction of its use instead;
- the Controller no longer need personal data for processing but the Data Subject needs it for proving, application or defending legal claims;
- the Data Subject objected to processing under Art. 21(1). of the Regulation until verification whether the legitimate reasons of the Controller overweight the legitimate interests of the Data Subject;
- the right that if the processing of personal data was restricted under Point(J)(d)(i) of this document, such restricted personal data is, except for retention, be processed only with the consent of the Data Subject or to establish, assert or defend legal claims, or to protect the rights of another natural or legal person, or for important public interest reasons of the European Union or a member state;
- the right to be informed in advance on cancellation of restriction of the processing of personal data;

**The right of the Data Subject to restrict the processing of personal data** means that until we have solved any disputes regarding the processing of your personal data, we must restrict the processing of your personal data so that we can only retain personal data of the Data Subject and not further process it.

**e) the right of the Data Subject to notification obligation towards recipients containing:**

- the right that the Controller notifies to each recipient to whom personal data was provided each rectification or erasure of personal data or restriction of processing under Art.16, Art.17(1) and Art.18 of the Regulation unless proven impossible or if it requires excessive effort;
- the right that the Controller informs the Data Subject on such recipients if the Data Subject requires so;

**The right of the Data Subject to notification obligation towards recipients** means in particular the obligation of the Controller to notify each recipient to whom personal data of the Data Subject was provided each rectification or erasure of personal data or restriction of processing. The Controller is relieved only when proven impossible or if it requires excessive efforts.

**f) the right of the Data Subject to portability of personal data containing:**

- the right to obtain personal related to the Data Subject and that provided to the Controller, in a structured, commonly used and machine-readable format and the right to transfer this data to another controller without being prevented by the Controller if:
  - processing is based on consent of the Data Subject under Art.6(1)(a) of the Regulation or Art. 9(2)(a) of the Regulation or contractually agreed under Art.6(1)(b) of the Regulation; and at the same time;
  - processing is automated; and at the same time;
  - the right to obtain personal data in a structured, commonly used and machine-readable format and the right to transfer this data to another controller without being prevented by the Controller will not adversely affect the rights and freedoms of others;
- the right to transfer personal data directly from one controller to another, if technically possible;

**The right to portability of data** means that you have the right to obtain from us personal data you have previously provided us with in a structured, commonly used and machine-readable format and have the right to request that we transfer your personal data to another controller subject to legal conditions; exercising this right is without prejudice to your right to erase personal data. The right to portability however relates only to personal data we collected from you based on a contract you are a party to.

**g) the right of the Data Subject to object containing:**

- The right to object to processing of personal related to the Data Subject due to reasons related to a particular situation of the Data Subject, while data is being processed based on Art.6(1)(e) or (f) of the Regulation, including objecting to profiling based on such provisions of the Regulation;

- [For realization of the right to object any time due to reasons related to a specific situation of the Data Subject against the processing of personal data related to the Data Subject under Art.6(1)(e) or (f) of the Regulation, including objecting to profiling based on such provisions of the Regulation] the right for the Controller to refrain from further processing of the personal data of the Data Subject, unless it proves the necessary legitimate reasons for processing that outweigh the interests, rights and freedoms of the Data Subject, or the reasons for establishing, asserting or defending legal claims;
- The right to object to processing of personal data related to the Data Subject for direct marketing, including profiling in a scope related to direct marketing, while it is true that if the Data Subject objects to processing of personal data for direct marketing, personal data shall not be processed for such purposes;
- (taking into account using services of information society) the right to apply the right to object to the processing of personal data by automated means using technical specifications;
- the right to object due to reasons related to a particular situation of the Data Subject to the processing of personal data related to the Data Subject if personal data is being processed for scientific or historical research or statistical purposes under Art. 89(1) of the Regulation except for cases when processing is inevitable for fulfilling a task due to public interest;

**The right of the Data Subject to object** means that the Data Subject may object to the processing of your personal data that we process for the purposes of direct marketing or due to legitimate reasons. When processing personal data for marketing purposes, we will stop as soon as we receive an objection.

**h) the right of the Data Subject related to automated individual decision-making containing:**

- the right that the Data Subject is not subject to decisions based exclusively on automated processing of personal data, including profiling that has legal effects related to the Data Subject or significantly affecting the Data Subject except for cases provided in Art.22(2) of the Regulation [that is except for cases when the decision is: (a) necessary for the conclusion or performance of a contract between the Data Subject and the Controller, (b) authorized by European Union law or by the law of a member state to which the Controller is subject and at the same time laying down appropriate measures guaranteeing the protection of the rights and freedoms and the legitimate interests of the Data Subject, or (c) based on the explicit consent of the Data Subject];

**The right of the Data Subject related to automated decision-making** means that as the Data Subject you are entitled not to be a subject to decisions based exclusively on automated decision-making including profiling that has legal effects related to you or significantly affecting you. If such processing is necessary for conclusion or performance of a contract based on explicit consent of the Data Subject, the Controller shall take appropriate measures for protection of rights and freedoms and legitimate interests of the Data Subject, in particular adopts minimal measures as the right for human intervention by the Controller, the right of the Data Subject to express his/her opinion and the right of the Data Subject to challenge the decision.

**i) the right of the Data Subject to bring proceedings under Sec.100 of the Data Protection Act containing:**

- the right of the Data subject who believes that his/her personal data has been unlawfully processed or that his/her personal data have been misused, to file an application with the Office for Personal Data Protection of the Slovak Republic (hereinafter the "Office") to initiate proceedings on personal data protection;
- Proceedings may be brought in writing, personally orally as the minutes, by electronic means, and must be signed by a guaranteed electronic signature, by telegraph or by fax, but must be completed in writing or orally in the minutes no later than within 3 days;
- Under Sec.100(3) of the Data Protection Act it shall contain the following:
  - name, surname, permanent address and signature of the applicant;
  - indication of the person against whom the application is directed; name or surname, registered office or permanent residence, legal form and identification number;
  - subject-matter of the application, indicating which rights, according to the applicant, were infringed in the processing of personal data;



- evidence to support of the claims made in the application;
- a copy of the instrument proving the exercise of the right under Sec. 28, if such right could be exercised, or an indication of the reasons of special consideration;
- The Office shall then decide on the applicant 's application within 60 days from the date of initiation of the proceedings. In justified cases, the Office may extend this period accordingly, but not more than by 6 months. The Office shall inform the parties in writing of the extension of this period;
- A sample of the application for the initiation of a personal data protection proceeding can be found on the Office's website ([https://dataprotection.gov.sk/uouu/sites/default/files/vzor\\_navrhu\\_na\\_zacatie\\_konania\\_podla\\_noveho\\_zako\\_na.docx](https://dataprotection.gov.sk/uouu/sites/default/files/vzor_navrhu_na_zacatie_konania_podla_noveho_zako_na.docx)).



M E D U S A

## Office for Personal Data Protection of the Slovak Republic

Address:

Hraničná 12  
820 07, Bratislava 27  
Slovak Republic  
ID: 36 064 220

Registry:

Monday - Thursday: 8:00am - 3:00pm  
Friday: 8:00am - 2:00pm

Phone consultation on personal data protection:

Tuesday and Thursday from 8:00am to 12:00am +421 2 323 132 20

Secretariat of the Head of the Office +421 2 323 132 11

Secretariat of the Office +421 2 323 132 14

Fax: +421 2 323 132 34

Spokesman:

mobile: 0910 985 794

e-mail: [hovorca@pdp.gov.sk](mailto:hovorca@pdp.gov.sk)

E-mail:

- generally: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk)

- for provision of information under Act No. 211/2000 Coll.: [info@pdp.gov.sk](mailto:info@pdp.gov.sk)

- website: [webmaster@pdp.gov.sk](mailto:webmaster@pdp.gov.sk)

- for submitting requests for information pursuant to Act No. 211/2000 Coll. on Free Access to Information [on-line form](#).

- email address through which the Office will provide you with advice on personal data protection. It is intended for children, youth, students, teachers, parents who suspect that their personal data has been misused: [ochrana@pdp.gov.sk](mailto:ochrana@pdp.gov.sk)



AM E D U S A

## **Cookie Policy**

In accordance with Sec. 55(5) of Act of the National Council of the Slovak Republic No. 351/2011 Coll. on Electronic Communications, as amended, we would like to inform you about the use of cookies and draw your attention to the possibility of changing the settings of your Internet browser if you are not happy with your current cookies setting.

### **What are cookies?**

Cookies are small text files that can be sent to your Internet browser when you visit websites and stored on your device (computer or other device with access to the Internet, such as a smartphone or tablet).

Cookies are stored in the file folder of your Internet browser. Cookies usually contain the name of the website from which they originate and the date they were created. The next time you visit the website, the Internet browser reloads cookies and sends this information back to the website that originally created cookies. The cookies we use do not harm your computer.

### **Using cookies**

When using website operated by the Controller you accept using cookies as set by your Internet browser. When visiting our websites, in your browser you have allowed to receive cookies, and if you do not change your Internet browser settings and continue to visit our website we consider this to be an acceptance of our cookies.

### **Why do we use cookies?**

We use cookies to create optimal and permanently increase quality of our services, accommodate to your interests and needs and improve their structure and contents as well as to create interesting offers for you. The Controller does not use the data obtained by using cookies as contact information to contact you via mail, e-mail or telephone.

### **How to change the cookies setting?**

Most of the Internet browsers is originally set to accept cookies. You may change the setting by blocking cookies or notification if cookies are about be sent to your device. For instructions on changing cookies, please refer to each browser's "Help" option. If you use more devices to access websites (e.g. a computer, smartphone, tablet), we recommend that each browser on each device be set to your preferences for cookies.

You can set your Internet browser to ban or block storing cookies on your device, including third-party cookies. It is also possible to block or allow storing cookies for certain websites only. You can delete cookies that are already stored on your device at any time. You decide on the use of cookies and their authorization in the web browser. However, if you change their settings, some of our websites may have limited functionality and reduced user experience.

### **Why to keep cookies setting?**

You decide on the use of cookies and their authorization in the web browser. However, if you change their settings, some of our websites may have limited functionality and reduced user experience.