

## Data protection information of Clients

*based on Articles 13 and 14 of the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons concerning the processing of personal data and on the free movement of such data (hereinafter referred to as the "Regulation"), as well, under Paragraph 19 and Paragraph 20 of the Act No. 18/2018 Coll. on Personal Data Protection and the amendment of certain other Acts (hereinafter referred to as the "Act")*

*This information aims to provide you with information about what personal data we process, how we treat it, for what purposes we use it, to whom we can provide it, and where you can obtain information about your personal data and exercise your rights in the processing of personal data.*

### Identification and contact data

The Company that processes your data is Telegrafia, a.s. Lomená 7 040 01 Košice, IČO: 17081386 email: [gdrp@telegrafia.sk](mailto:gdrp@telegrafia.sk) (hereinafter referred to as the "Operator")

In case of uncertainty, questions regarding the process of your personal data, suggestions, or complaints, or if you believe that we process your personal data illegally or unfairly, or in case of exercising any of your rights, you can contact us at any time by sending an email to: [gdrp@telegrafia.sk](mailto:gdrp@telegrafia.sk), or in writing to the operator's address. We will try to deal with your correspondence as soon as possible, but we will respond within 1 month from the day of its receipt. In certain cases, we may need to add information to identify and verify your identity to process your request.

Received questions, suggestions, requests for exercising your rights, etc. they may be provided to our external responsible person, who ensures independent supervision of the correct and secure processing of your personal data. If you are interested, you can also contact the responsible person directly: email: [dpo7@proenergy.sk](mailto:dpo7@proenergy.sk)

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

## Overview of processing activities

We may process your personal data as part of the following processing activities (IS):

**Camera system** - if you operate within our monitored premises, which are marked with a camera sign at the entrance, you will be recorded on a camera recording, the purpose of which is to maintain safety (including crime detection), protect life, health, property and financial interests of the operator and protection of life, health and property of persons moving in the monitored area. We respect your right to privacy and do not monitor with cameras the zones where you expect privacy - these are mainly spaces intended for rest and relaxation (kitchen, toilets, dressing rooms, common room - rest room, dining room tables). The records can be used to infer responsibility towards you in case of violation of internal regulations, if we have ensured your adjustment with them, and/or legal regulations related to threats or damage to property, life, health, safety, or financial interests. Processing is a legitimate interest of the operator or a third party.

**Legal disputes/proceedings** - we can process your personal data if we are involved in legal proceedings with you, based on a legal obligation and/or within the legitimate interest of the operator or a third party to prove, exercise or defend legal claims.

**Accounting documents** - we can process your personal data in connection with the performance of the contract with you to fulfil accounting and tax obligations in accordance with special legal regulations.

**Reporting of anti-social activity** – we can process your personal data if you have anonymously submitted a notification about possible anti-social activity, or if you are the subject of, or a participant in, an investigation into possible anti-social activity according to a special legal regulation.

**E-shop** - we can process your personal data if we accept your order through the e-shop. We will process your data for the purpose of selling goods, preparing accounting documents, sending goods and possibly for providing other related services, related to the performance of the contract, and resulting from legal regulations (especially complaints). The legal basis is the fulfilment of the contract with you and the fulfilment of our legal obligations.

**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 effective search and advertising. In the case of data that is not exclusively technical, we need your voluntary consent to the use of cookies for such processing.

**Clients** - we can process your personal data in connection with the performance of the contract between you and us and at the same time and for the performance of legal obligations fulfilment of the performance of the contract.

The data from some of the processing operations mentioned above refer to the relevant case and, to the extent necessary, can be used in the context of proving or defending our legal claims, or the legal claims of a third party (e.g., an authority that can interfere in criminal proceedings, an executor, a lawyer, etc.), in the context of judicial or extrajudicial proceedings, debt collection, etc. Some personal data obtained (e.g., confirmations, records, other documents to confirm the given fact, etc.) may be stored and used as "evidence" for the purposes of auditing, control activities by third parties, as part of the verification of the fulfilment of the operator's obligations in terms of legislative regulations, requirements, or other requirements (contractual, sectoral, etc.). Some obtained data may be used for internal statistical purposes of the operator, and improvement of processes and services, but to the necessary extent and according to the possibilities of using security elements of anonymization, pseudonymization, and encryption.

## Additional general information

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We process your personal data as part of the above-mentioned processing activities in accordance with the principles of personal data processing in such a way that we process your personal data to the extent necessary to achieve the specified legal purpose and store them for the necessary period in accordance with current legal regulations (especially the Archives Act and registries). Individual erasure deadlines are listed in the "Details of processing activities" section of this information. The stated times may be extended in rare cases, especially in the context of proving, exercising or defending legal claims.

We obtain your personal data primarily from you as the data subject (or from your legal representative), otherwise, if we obtain it from other sources, we transparently inform you of this fact, and we make sure that this data is obtained legally (for example, with your consent) and are correct and up-to-date. In case of any change in your personal data, we ask you to report this change.

Access to your personal data is given to our authorized persons who are properly trained on the rules and responsibilities for processing your personal data and are committed to maintaining the confidentiality of your personal data with which they come into contact.

Access to your personal data may also be given to external recipients and other parties who are permitted or required to do so by a special legal regulation or are ordered to exercise public authority. They are mainly organizations and institutions (including state administration authorities and public authorities for the exercise of control and supervision), but it can also be contractual partners who have the status of an independent operator in the sense of special regulation, or other persons/entities regulated by legal regulation. Furthermore, we may share your personal data with intermediaries whom we have contractually entrusted with the processing of your personal data and who have undertaken to accept adequate guarantees of maintaining the protection of the processed personal data. If you have given us voluntary consent or given us the order to provide data, your personal data may also be provided to other recipients. Likewise, your personal data may be shared with contractual partners for the performance of the contract between you and the operator. A specific list of recipients for each processing activity is provided in the "Details of processing activities" section of this information.

Through this information, we inform you of any transfer of personal data to third countries or international organizations. In the case of such a transfer, this fact is stated in the "details of processing activities" section of this information, together with the guarantees of such a transfer, which can mainly be (i) the decision of the Commission that the country or international organization provides adequate guarantees, (ii) signed standard contractual clauses between importer and exporter of data, (iii) adopted binding internal rules, (iv) or any of the exceptions for special situations apply (for example, your express consent) and so on.

These and other specific information on the processing of your personal data are listed separately for each processing activity in the "Details of processing activities" section of this information.

## Your rights

As a data subject about whom we process personal data, you have rights in connection with the processing of personal data in accordance with the GDPR and the Act on Personal Data Protection. Below is an overview of them. If you decide to use some of your rights, you can use our application form in the attachment, which you send to the contact listed at the beginning of this information. If you are not sure of your right, or if you need help filling out the application, you can contact our external responsible person - the contact is available at the beginning of this information.

### Access rights

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

- for what purpose do we process your personal data,
- what categories of personal data do we process,
- with whom we share your personal data,
- how long do we keep your personal data or what are the criteria for determining this time,
- what rights do you have
- where did we obtain your personal data from (if we did not obtain it directly from you),
- whether the processing includes automated decision-making (so-called profiling),
- whether your personal data has been transferred to a country that is outside the European Union, or outside 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 information. In case of your request, we will provide you with a copy of the personal data that we process about you. We may charge a reasonable administrative fee for any additional copies you request. The right to obtain a copy must not have unfavourable consequences on the rights and freedoms of others. The operator will provide you with information about the option, the procedure used, possible costs, and other detailed information about providing a copy after receiving your request. If you submitted a request by electronic means, the information will be provided to you in a commonly used electronic form, unless you request another method.

Note: You can easily exercise the right of access by filling out the application - article "D" according to Annex No. 1 of this information.

### Data transfer rights

You have the right to receive your personal data, which you have provided us for processing based on consent or to fulfil a contract, in a structured, commonly used, and machine-readable format. You also have the right to request the transfer of this information to another operator.

Note: You can easily exercise the right to transfer data by filling out the application - article "E" according to Annex No. 1 of this information.

### Correction rights

It is important that we have correct and complete information about you to avoid errors, unpleasant situations, and unwanted effects. You not only have the right to immediate correction of incorrect or incomplete personal data that we process about you, but at the same time, we also ask you to notify us immediately of any change or addition to personal data, especially if you have changed your identification/contact data, payment data they moved, etc.

Note: You can easily exercise the right to correct (or supplement) data by completing the application - articles "A or B" according to Annex No. 1 of this information.

### Erasure rights (right to be "forgotten")

You have the right to request the deletion of personal data concerning you. We will comply with such a request without delay if any of the following reasons are met:

- personal data are no longer necessary for the purposes for which they were obtained or otherwise processed, or
- you revoke the consent based on which the processing is carried out and there is no other legal basis for the processing, or
- you object to processing and there are no valid reasons for the processing, or you object to processing for the purpose of direct marketing (including profiling), or

- personal data was processed illegally, or
- personal data must be deleted to comply with a legal obligation under Union law or the law of a Member State to which the controller is subject, or
- personal data were obtained in connection with the offer of information company services.

For example, you can ask us to delete it because we process your personal data in an unlawful way, for example, if we process your personal data for longer than necessary or without reason.

However, in some cases we will not be able to comply with your request, e.g. if the processing of personal data is obligatory to exercise the right to freedom of expression and information, to fulfil a legal obligation that requires processing under Union law or the law of a Member State to which the operator is subject, or to perform a task carried out in the public interest, for reasons of public interest in the field of public health, to archive in the public interest, for proving, exercising or defending legal claims.

Note: You can easily exercise the right to delete data by completing the application - article "C" according to Annex No. 1 of this information.

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

You have the right to restrict us from processing your personal data in one of the following cases:

- you challenge the accuracy of personal data during the period allowing us to verify the accuracy of personal data, or
- the processing is illegal and you, as the data subject, object to the deletion of personal data and request instead the restriction of their use, or
- we, as the operator, no longer need your personal data for processing purposes, but you, as the data subject, need them to prove, exercise or defend legal claims, or
- you object to the processing, until verification whether the legitimate reasons on our side as the operator outweigh the legitimate reasons of you as the person concerned.

If the processing has been limited according to the above-mentioned reasons, we may process such personal data (except storage) only with your consent or to demonstrate, exercise or defend legal claims, or to protect the rights of another person or legal entity, or for reasons of important public interest of the Union or a member state.

We will inform you before the restriction of processing at the operator is lifted.

Simultaneously, we want to assure you that if you exercise your right to correction, deletion, or restriction of processing of personal data through a request, we will immediately notify each recipient to whom we have provided personal data of this fact (correction, deletion, or restriction of processing), unless it proves impossible or requires an unreasonable effort.

Note: You can simply exercise the right to restrict data processing by completing the application - article "F" according to Annex No. 1 of this information.

### **The right to object to processing**

If you believe that we do not have the right to process your personal data, you can object to our processing. These are situations where the processing is carried out based on a legitimate interest that we pursue as an operator or a task carried out in the public interest, including objection to profiling. In such cases, we can only continue processing if we can demonstrate legitimate reasons that outweigh your interests, rights, and freedoms. However, we may always process your personal data if it is necessary to determine, exercise or defend legal claims. If we process your personal data for the purposes of direct marketing, you have the right to object at any time to the processing of your personal data for the purposes of such marketing.

Note: You can easily exercise the right to object to data processing by completing the application - article "G" according to Annex No. 1 of this information.

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

In case of profiling performance, we will inform you in detail about these actions within the framework of specific processing activities. At the same time, we want to assure you that if we state that such processing is not carried out, it means that your personal data is not and will not be used to evaluate or predict your personal aspects related to performance at work, property conditions, health, personal preferences, interests, reliability, behaviour, position, or movement.

If we carry out such processing, you have the right to ask us not to be part of the profiling. However, in some cases we will not be able to comply with your request, e.g. if the decision is necessary for the conclusion or performance of a contract between the person concerned and the operator, or if the decision is permitted by Union law or the law of a Member State and which also establishes appropriate measures guaranteeing the protection of the rights and freedoms and legitimate interests of the person concerned, or if the decision is based with the express consent of the person concerned.

Note: You can easily exercise this right by filling out the application - article "H" according to Annex No. 1 of this information.

#### **The right to withdraw consent to the processing of personal data**

If you have given us your consent to process personal data in the past, you have the right to withdraw this voluntary consent at any time. We will respect your decision and ensure that your personal data is no longer processed for this purpose. At the same time, however, the withdrawal of consent does not affect the legality of the processing of personal data based on consent prior to its withdrawal (in practice, this may mean that if your data has been published in accordance with the consent granted, e.g., in distributed promotional materials, the disposal of these sent materials, as the consent was valid at the time of distribution).

If you give us your consent to electronic technical means, you have the right to revoke these means. Or you can simply write to us at the contact given at the beginning of this information that you no longer wish us to process your data and agree to withdraw.

#### **The right to file a complaint with a supervisory authority**

In case you are not satisfied with our answer, or you believe that we have violated your rights, or we are processing your personal data unfairly, illegally, etc. you could file a complaint - a proposal to initiate proceedings to the supervisory authority, which is the Personal Data Protection Office of the Slovak Republic. More detailed information about the procedure for submitting complaints is available at [www.dataprotection.gov.sk](http://www.dataprotection.gov.sk).



## Safety in the processing of your personal data

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

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

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

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

We have documented all processes related to the processing of your personal data and regularly update them. Each new process is properly assessed and approved.

When processing personal data, we consider the risk you face in case of loss of confidentiality, availability, or integrity, and processing operations with a higher risk are treated with numerous measures to guarantee higher protection.

We periodically carry out control/audit activities aimed at compliance with the established rules and assessment of compliance with the requirements of personal data protection and security, and in case of detected deficiencies, we work diligently to eliminate them.

We use the services of an independent (unbiased) external responsible authority who supervises the correct, legal and safe processing of personal data with us.

Authorized authorities who have access to your personal data as part of their job position/function are bound by confidentiality in relation to personal data, are properly trained before the first processing and then, as necessary, retrained on the requirements and responsibilities when processing personal data.

We only use the services of verified suppliers-intermediaries who have contractually agreed to take adequate security measures when processing your personal data.

Authorized authorities' access to your personal data is governed by the "need to know" and "need to use" rules.

We have an established security incident/personal data breach management system, and we ensure continuity of activities.

We maintain an up-to-date register of primary and supporting assets in connection with the processing of personal data, which is reflected in adequate security measures, including rules for secure erasure/disposal, backup, encryption, protection against malicious code, elements of adequate authentication, pseudonymization, or anonymization, rules for the use of assets, including their transmission and many others.

## Details of processing activities (IS)

### IS camera system (legitimate interest)

**1 Purpose of personal data processing and legal basis of processing**

The purpose of personal data processing is:

monitoring of premises through a camera system for maintaining security (including crime detection), protection of life, health, property and fiscal interests of the operator and protection of life, health and property of persons moving in the monitored premises.

Personal data is processed based on:

(1) article 6 paragraph 1 letter f) of the GDPR regulation: legitimate interest.

**2 Identification of processed personal data of affected persons**

Affected persons whose personal data we process:

persons moving in the monitored space.

Extent of personal data that we process:

camera footage capturing the affected person (face, activity, etc.).

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

| Categories of recipients  | Identification of recipients                           |
|---|--|
| (1) Institutions, organizations, contractual partners, or other parties whose access is permitted by a special legal regulation, and/or the exercise of public authority (Article 6, paragraph 1, letters c) and e) of the Regulation), e.g.:<br>- Act No. 171/1993 Coll. on the police force (especially §76a)<br>- other legal regulation<br>(2) Intermediary based on the contract (Article 28 of the GDPR regulation)<br>(3) Another operator, if you have given consent (Article 6, paragraph 1, letter a) of the GDPR regulation)<br>(4) Contractual partner, as part of the performance of the contract between you and the operator (Article 6, paragraph 1, letter b) of the GDPR regulation)<br>(5) another party based on a legitimate interest (Article 6, paragraph 1, letter f) of the GDPR regulation) | (1) police force, other authorized entity,<br>(2) SBS. |

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

Transfer to a third country or international organization is not conducted.

**5 Identification of the source where personal data was obtained**

Directly affected person.

**6 Storage period of personal data**

7 days.

**7 Profiling**

Is not carried out.

**8 Obligation to provide personal data**

The processing of personal data is carried out to protect the legitimate interests of the operator and a third party. The affected person decides to provide his personal data by moving in the monitored premises. In case of movement in the monitored area, the person concerned is automatically recorded on the camera recording, without the possibility to decide on the processing/non-processing of their personal data.



## IS legal actions

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

The purpose of personal data processing is:

proving, exercising, or defending legal claims in legal actions.

Personal data is processed based on:

(1) article 6 paragraph 1 letter. f) GDPR regulations: legitimate interest,

(2) article 6 paragraph 1 letter c) GDPR regulations, particularly:

- Act No. 160/2015 Coll. Civil Dispute Code,
- Act No. 161/2015 Coll. Civil Non-Dispute Code,
- Act No. 301/2005 Coll. Criminal Code,
- Act No. 162/2015 Coll. Administrative Court Code

(3) article 9 paragraph 2 letter f) GDPR regulations: proving, exercising, or defending legal claims,

(4) article 10: the processing of data related to prove of guilt for crimes and misdemeanours is permitted by the law of the Union or a Member State.

### 2 Identification of processed personal data of affected persons

Affected persons whose personal data we process:

persons – operators and intermediaries, authorized persons of operators and intermediaries, affected persons, other persons in the position of participants in the proceedings.

Extent of personal data that we process:

personal data, identification data (name, surname, address of permanent residence or residence, date of birth or other identification data - in particular ID or passport number), contact data (telephone number, email), or other personal data found or provided during the procedure. Depending on the case, sensitive personal data may also be processed (for example, data relating to guilty pleas for crimes and misdemeanours may be processed).

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

| Categories of recipients  | Identification of recipients   |
|---|--|
| (1) Institutions, organizations, contractual partners, or other parties whose access is permitted by a special legal regulation, and/or the exercise of public authority (Article 6, paragraph 1, letters c) and e) of the Regulation), e.g.:<br>a)-Act No. 160/2015 Coll. Civil Dispute Code,<br>b)-Act No. 301/2005 Coll. Criminal Code,<br>b)-Act No. 171/1993 Coll. on the police force (especially §76a)<br>c)- other legal regulation<br>(2) Intermediary based on the contract (Article 28 of the GDPR regulation)<br>(3) Another operator, if you have given consent (Article 6, paragraph 1, letter a) of the GDPR regulation)<br>(4) Contractual partner, as part of the performance of the contract between you and the operator (Article 6, paragraph 1, letter b) of the GDPR regulation)<br>(5) another party based on a legitimate interest (Article 6, paragraph 1, letter f) of the GDPR regulation) | (1a,5) courts,<br>(1b,5) law enforcement authorities,<br>(1c) other authorized entity. |

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

Transfer to a third country or international organization is not carried out.

### 5 Identification of the source where personal data was obtained

Directly from the person concerned, or his representative, from other authorized entities governed by special regulations, e.g., executor, courts.

### 6 Storage period of personal data

10 years from the legal end of the legal proceedings.

### 7 Profiling

Is not carried out.

### 8 Obligation to provide personal data

The processing of personal data is carried out to protect the legitimate interests of the operator and a third party. If the operator/third party appears in the proceedings as authorized, the provision is required as part of a legitimate interest, in the event of non-provision, the operator or the third party (including the affected person) will not be able to prove, exercise or defend their legal claims. If the operator/third party (including the affected person) appears in the proceedings as an obligee,

or as a third party who is obliged to provide cooperation, the provision of data is a legal obligation, otherwise the law may be violated.

## IS accounting documents

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

The purpose of personal data processing is:

processing of accounting documents and contracts, fulfilment of tax obligations.

Personal data is processed based on:

- (1) article 6 paragraph 1 letter. f) GDPR regulations: legitimate interest,
- (2) article 6 paragraph 1 letter c) GDPR regulations, particularly:
  - Act No. 431/2002 Coll. on accounting as amended,
  - Act No. 222/2004 Coll. on VAT, as amended,
  - Act No. 40/1964 Coll. on Civil Code, as amended,
  - Act No. 595/2003 Coll. on income tax, as amended,
  - z Act No. 513/1991 Coll. Commercial Code,
  - Act No. 563/2009 Coll. on tax administration (tax code) and on amendments to certain laws as amended.

### 2 Identification of processed personal data of affected persons

Affected persons whose personal data we process:

clients/contractual partners of the operator, taxpayers of the operator.

Extent of personal data that we process:

personal data of clients, contractual partners, taxpayers: identification (name, surname, address, signature, in special cases if required by law, e.g. Act No. 595/2003Z.z., Act No. 563/2009Z.z., social security number or date of birth for persons is also processed), contact (phone number, email), financial (bank account number, amount), other data-details related to the performance of the contract, accounting and tax obligations. Husbands, wives, and children of taxpayers in the extent of last name, first name and social security number, confirmations (e.g., school attendance confirmation) in case the taxpayer claims a reduction of the tax base and a tax bonus for them.

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

| Categories of recipients  | Identification of recipients   |
|---|--|
| (1) Institutions, organizations, contractual partners, or other parties whose access is permitted by a special legal regulation, and/or the exercise of public authority (Article 6, paragraph 1, letters c) and e) of the Regulation), e.g.: <ul style="list-style-type: none"> <li>a) -Act No. 595/2003 Coll. on income tax as amended</li> <li>a) - Act No. 222/2004 Coll. on VAT, as amended,</li> <li>a) - Act No. 563/2009 Coll. on tax administration (tax code) and on amendments to certain laws as amended,</li> <li>b)- Act No. 431/2002 Coll. on accounting as amended,</li> <li>b)- Act No. 423/2015 Coll. on statutory audit and on amendments to Act no. 431/2002 Coll. on accounting as amended</li> <li>c)- other legal regulation</li> </ul> (2) Intermediary based on the contract (Article 28 of the GDPR regulation)<br>(3) Another operator, if you have given consent (Article 6, paragraph 1, letter a) of the GDPR regulation)<br>(4) Contractual partner, as part of the performance of the contract between you and the operator (Article 6, paragraph 1, letter b) of the GDPR regulation)<br>(5) another party based on a legitimate interest (Article 6, paragraph 1, letter f) of the GDPR regulation) | (1a) tax administrator,<br>(1b) auditors,<br>(1c) other authorized entity, |

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

Transfer to a third country or international organization is not carried out.

### 5 Identification of the source where personal data was obtained

Directly affected person, from the employer, from public registers (e.g., business register, trade register).

### 6 Storage period of personal data

10 years.

### 7 Profiling

Is not carried out.

**8 Obligation to provide personal data**

The delivery of personal data is a legal requirement/contractual requirement, or a requirement that is necessary to conclude a contract. The person concerned has an obligation to provide personal data, in case of failure to provide personal data, the operator cannot enter a contractual relation with you, or fulfil a contractual relation, including the processing of accounting documents, and at the same time fulfil legal obligations, thereby violating the law.

**IS reporting anti-social activity**

**1 Purpose of personal data processing and legal basis of processing**

The purpose of personal data processing is:

investigation of notifications according to Act no. 54/2019 Coll. on the protection of whistle-blowers of anti-social activity and on the amendment of certain laws.

Personal data is processed based on:

(1) article 6 paragraph 1 letter c) GDPR regulations:

- Act No. 54/2019 Coll. on the protection of whistle-blowers of anti-social activity and on the amendment of certain laws,
- (2) Art. 9 par. 2 letters g) GPPR Regulations: significant public interest based on Union law or Member State law.

**2 Identification of processed personal data of affected persons**

Affected persons whose personal data we process:

persons who have submitted a notification of anti-social activity or a request for protection upon notification of serious anti-social activity (or persons close to them for whom protection is requested) and persons who are investigated based on the notification.

Extent of personal data that we process:

personal data specified in the notification and data necessary for its review (in particular, common personal identification data about the notifier, persons involved in the violation, and details of the notification (may contain data of varying sensitivity). Expected list of personal data: Title, first name, last name, date of birth and residence of the informant, place of work, employer's name, information about a close person, if he is in an employment relationship with the same employer as the informant or is in an employment relationship with an employer who is a dependent person concerning the reporting person's employer, and the reporting person requests protection for this close person as well, and other data necessary to verify the report.

**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 whose access is permitted by a special legal regulation, and/or the exercise of public authority (Article 6, paragraph 1, letters c) and e) of the Regulation), e.g.:<br>-Act No. 54/2019 Coll. Act on the Protection of Whistle-blowers of Anti-Social Activities and Amendments to Certain Acts<br>- Act No. 301/2005 Coll. Criminal Code<br>- Act No. 171/1993 Coll. on the police force (especially §76a)<br>- other legal regulation<br>(2) Intermediary based on the contract (Article 28 of the GDPR regulation)<br>(3) Another operator, if you have given consent (Article 6, paragraph 1, letter a) of the GDPR regulation)<br>(4) Contractual partner, as part of the performance of the contract between you and the operator (Article 6, paragraph 1, letter b) of the GDPR regulation)<br>(5) another party based on a legitimate interest (Article 6, paragraph 1, letter f) of the GDPR regulation) | (1) Office for the Protection of Whistle-blowers of Anti-Social Activities, participants in proceedings, other competent administrative authorities, Slovak Police Force, Slovak Prosecutor's Office, Slovak courts, and other authorized entities. |

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

Transfer to a third country or international organization is not carried out.

**5 Identification of the source where personal data was obtained**

The directly affected person (in person, to the mailbox, by email, by phone, or via the operator's website).

**6 Storage period of personal data**

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

**7 Profiling**

Is not carried out.

**8 Obligation to provide personal data**

The person concerned provides his personal data voluntarily, in accordance with the law, in case of failure to provide them, it will not be possible to notify the result of the investigation of the complaint/notification, nor to contact him for additional information if necessary.

**IS e-shop**

**1 Purpose of personal data processing and legal basis of processing**

The purpose of personal data processing is:

sale of goods to the buyer, preparation of accounting documents, shipment of goods and possible provision of other services related to the performance of the contract and resulting from legal regulations (especially complaints).

Personal data is processed based on:

- (1) article 6 paragraph 1 letter. f) GDPR regulations: legitimate interest,
- (2) article 6 paragraph 1 letter c) GDPR regulations, particularly:
  - Act No. 513/1991 Coll. Commercial Code, as amended
  - Act No. 40/1964 Coll. Civil Code, as amended,
  - Act No. 22/2004 Coll. about electronic commerce,
  - Act No. 250/2007 Coll. on consumer protection as amended,
  - Act No. 108/2000 Coll. on consumer protection in door-to-door sales and mail-order sales, as amended.

**2 Identification of processed personal data of affected persons**

Identification of processed personal data of affected persons

customers/buyers.

The extent of personal data that we process:

personal data - identification, contact, payment, other related to the purchased goods, in particular: title, first name, last name, delivery address, phone number, e-mail address, payment data, order details.

**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 whose access is permitted by a special legal regulation, and/or the exercise of public authority (Article 6, paragraph 1, letters c) and e) of the Regulation), e.g.:<br>-Act No. 250/2007 Coll. on consumer protection as amended,<br>- other legal regulation<br>(2) Intermediary based on the contract (Article 28 of the GDPR regulation)<br>(3) Another operator, if you have given consent (Article 6, paragraph 1, letter a) of the GDPR regulation)<br>(4) Contractual partner, as part of the performance of the contract between you and the operator (Article 6, paragraph 1, letter b) of the GDPR regulation)<br>(5) another party based on a legitimate interest (Article 6, paragraph 1, letter f) of the GDPR regulation) | (1) Slovak Trade Inspection, other authorized entity,<br>(4) carrier/delivery service. |

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

Transfer to a third country or international organization is not carried out.

**5 Identification of the source where personal data was obtained**

The directly affected person (via the e-shop website, by email, by phone).

**6 Storage period of personal data**

10 years.

**7 Profiling**

Is not carried out.

**8 Obligation to provide personal data**

The provision of personal data is a legal requirement/contractual requirement, or a requirement that is necessary to conclude a contract. The person concerned has the obligation to provide personal data, in case of failure to provide them, the operator will not guarantee the processing and delivery of the order to the person concerned.

We may further process the data provided within our legitimate interest for the purpose of sending marketing offers of related products that the data subject has purchased or expressed interest in (e.g. canceled order). If the person concerned is

bothered by such offers, he can contact us and use the right to object to the processing - then he will no longer be part of our marketing campaigns.

## IS cookies

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

The purpose of personal data processing is:

providing and improving services, developing new services, protecting users, and ensuring effective search and advertising.

Personal data is processed based on:

- (1) article 6 paragraph 1 letter a) GDPR regulations: the consent of the person concerned,
- (2) article 6 paragraph 1 letter f) GDPR regulations: legitimate interest.

### 2 Identification of processed personal data of affected persons

Affected persons whose personal data we process:

users of the operator's website.

The extent of personal data that we process:

- personal data (ordinary - enabling direct or indirect identification, location data).

### 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 whose access is permitted by a special legal regulation, and/or the exercise of public authority (Article 6, paragraph 1, letters c) and e) of the Regulation), e.g.:<br>- <i>other legal regulation</i><br>(2) Intermediary based on the contract (Article 28 of the GDPR regulation)<br>(3) Another operator, if you have given consent (Article 6, paragraph 1, letter a) of the GDPR regulation)<br>(4) Contractual partner, as part of the performance of the contract between you and the operator (Article 6, paragraph 1, letter b) of the GDPR regulation)<br>(5) another party based on a legitimate interest (Article 6, paragraph 1, letter f) of the GDPR regulation) | (1) other authorized entity. |

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

The operator transfers personal data to (a third country in the USA, which does not provide adequate guarantees of personal data protection according to Article 45 of the GDPR regulation. The operator has accepted adequate guarantees in the form of standard data protection clauses adopted by the Commission according to Article 46, paragraph 2, letter c) of the GDPR regulation.

### 5 Identification of the source where personal data was obtained

Directly affected person (using the operator's website).

### 6 Storage period of personal data

After the consent period has expired (if the consent is not renewed by the person concerned)

### 7 Profiling

The operator processes personal data through automated individual decision-making, using the procedure... The processing is significant for the purposes of..., the expected consequences of such processing of the personal data of the affected persons are.../are unknown.

### 8 Obligation to provide personal data

The person concerned provides his personal data voluntarily, based on consent (provision is not a legal/contractual requirement), in case of failure to provide them, the operator will not monitor and evaluate the behaviour of the website user to ensure the provision, improvement and development of new services, user protection and effective search and advertisements.



## IS clients

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

The purpose of personal data processing is:

fulfilment of the contract (delivery of goods/services) and possible provision of other related services related to the fulfilment of the contract and arising from legal regulations (especially complaints).

Personal data is processed based on:

(1) Act No. 6 paragraph 1 letter b) GDPR regulations: pre-contractual, contractual relationship,

(2) Act No. 6 paragraph 1 letter c) GDPR regulations, especially:

- Act No. 513/1991 Coll. the Commercial Code, as amended,

- Act No. 40/1964 Coll. the Civil Code, as amended,

- Act No. 250/2007 Coll. on consumer protection as amended,

- Act No. 102/2014 Coll. on consumer protection when selling goods or providing services on the basis of a contract concluded at a distance or a contract concluded outside the seller's premises and on amendments to certain laws.

### 2 Identification of processed personal data of affected persons

Affected persons whose personal data we process:

clients.

The extent of personal data that we process:

personal data - identification, contact, payment, behavioural, especially title, first name, last name, email, phone number, address, payment details, purchased goods/services

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

Category of recipients

(1) Institutions, organizations, contractual partners, or other parties whose access is permitted by a special legal regulation, and/or the exercise of public authority (Article 6, paragraph 1, letters c) and e) of the Regulation), e.g.:

-Act No. 250/2007 Coll. on consumer protection as amended

- other legal regulation

(2) Intermediary based on the contract (Article 28 of the GDPR regulation)

(3) Another operator, if you have given consent (Article 6, paragraph 1, letter a) of the GDPR regulation)

(4) Contractual partner, as part of the performance of the contract between you and the operator (Article 6, paragraph 1, letter b) of the GDPR regulation)

(5) another party based on a legitimate interest (Article 6, paragraph 1, letter f) of the GDPR regulation)

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

Transfer to a third country or international organization is not carried out.

### 5 Identification of the source where personal data was obtained

The directly affected person or their legal representative.

### 6 Storage period of personal data

For the duration of the contractual relationship/ 10 years.

### 7 Profiling

Is not carried out.

Identification of recipients

(1) Slovak Trade Inspection (2) other authorized entity,  
(4) carrier/delivery service.



**8 Obligation to provide personal data**

The provision of personal data is a contractual requirement or a requirement that is necessary to conclude a contract. The affected person must provide personal data, in case of failure to provide them, the operator will not ensure the conclusion or performance of the contract or services related to the performance of the contract (especially complaints) to the affected person.

**IS marketing**

**1 Purpose of personal data processing and legal basis of processing**

The purpose of personal data processing is:

conducting marketing (informing about news, discounts and other marketing offers).

Personal data is processed based on:

- (1) article 6 paragraph 1 letter a) GDPR regulations: the consent of the person concerned,
- (2) article 6 paragraph 1 letter f) GDPR regulations: legitimate interest,

**2 Identification of processed personal data of affected persons**

Affected persons whose personal data we process:

clients/customers/potential customers.

The extent of personal data that we process:

personal data - identification, contact, other data - related to purchasing behaviour, as follows: title, first name, last name, address, email address, details of the purchased product/service

**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 whose access is permitted by a special legal regulation, and/or the exercise of public authority (Article 6, paragraph 1, letters c) and e) of the Regulation), e.g.:<br>- <i>other legal regulation</i><br>(2) Intermediary based on the contract (Article 28 of the GDPR regulation)<br>(3) Another operator, if you have given consent (Article 6, paragraph 1, letter a) of the GDPR regulation)<br>(4) Contractual partner, as part of the performance of the contract between you and the operator (Article 6, paragraph 1, letter b) of the GDPR regulation)<br>(5) another party based on a legitimate interest (Article 6, paragraph 1, letter f) of the GDPR regulation) | (1) other authorized entity. |

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

Transfer to a third country or international organization is not carried out.

**5 Identification of the source where personal data was obtained**

The person directly concerned.

**6 Storage period of personal data**

5 years.

**7 Profiling**

Is not carried out.

**8 Obligation to provide personal data**

The person concerned provides his personal data voluntarily, on the basis of consent (provision is not a legal/contractual requirement), in case of failure to provide them, he will not be informed about news, discounts or other marketing offers. If the person concerned shows interest in our services/products (for example, buys or inquires about a product/service), he can expect to be sent related marketing offers, which we carry out in our legitimate interest. If the person concerned is

bothered by such offers, he can contact us and use the right to object to the processing - then he will no longer be part of our marketing campaigns.

## Attachments

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### Attachment n.1

.....  
(Title, name, surname, address of the applicant)

**Telegrafia, a.s.**  
Lomená 7, 040 01 Košice  
ID number: 17081386

In ....., on .....

#### **Request to exercise of rights in the processing of personal data**

Dear ..... (responsible person, company, operator),

in accordance with the relevant legal regulations in the discipline of personal data protection, you hereby as the person concerned.

#### **I request**

*\* (select one or more of the options below A-H, according to the type of your request, delete unnecessary ones)*

**(A) - the correction of personal data**, which you process about me in connection with.....  
(present the specification of the relationship with the operator or other circumstances in which personal data may be processed, which will help the operator identify your person)

Request details:

Due to the processing of incorrect personal data, I ask you to correct them as follows:

Incorrect personal data:  
..... (present incorrect personal data, if known to you)

Correct personal data:  
..... (present correct - up-to-date personal data)

**(B) - the addition of personal data**, which you process about me in connection with.....  
(present the specification of the relationship with the operator or other circumstances in which personal data may be processed, which will help the operator identify your person)

Request details:

Due to the processing of incorrect personal data, I ask you to correct them as follows:

Incomplete personal data:  
..... (present incomplete personal data, if known to you)

Complete personal data:  
..... (present complete personal data)

**(C) – the deletion of personal data**, which you process about me in connection with.....  
*(present the specification of the relationship with the operator or other circumstances in which personal data may be processed, which will help the operator identify your person)*

Request details:

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

*(select one or more of the options which relates to your request)*

- personal data are no longer necessary for the purposes for which they were obtained and processed for
- cancellation of my consent to the processing of personal data
- based on my objection to processing personal data, it was found that the operator's legitimate reasons for processing do not outweigh my interests, rights, and freedoms
- my objection to processing my personal data for direct marketing purposes (including profiling)
- my personal data was processed illegally
- personal data must be deleted based on a specific legal regulation
- personal data was obtained in connection with the offer of information society services to the child

Explanation:

..... *(add a more detailed description of the situation)*

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**(D) - providing a copy of personal data**, which you process about me in connection with.....  
*(present the specification of the relationship with the operator or other circumstances in which personal data may be processed, which will help the operator identify your person)*

Request details:

In case of confirmation of having personal data relating to me, I request access to this data by sending a copy  
..... *(present the required form of personal data provided, e.g., in electronic form to an email address/in printed form to an address)*

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**(E) - providing a copy of personal data to another operator**, which you process about me in connection with.....  
*(present the specification of the relationship with the operator or other circumstances in which personal data may be processed, which will help the operator identify your person)*

Request details:

Operator to whom personal data will be transferred: ..... *(specify identification data of the operator)*

Form and place of data provision:..... *(specify in what form and to which place the transferred data should be delivered, e.g., in electronic form to an email address/in printed form to an address)*

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**(F) - restriction of personal data processing**, which you process about me in connection with.....  
*(present the specification of the relationship with the operator or other circumstances in which personal data may be processed, which will help the operator identify your person)*

Request details:

I request restriction of processing for the following reason:

*(select one or more of the options which relates to your request)*

- the personal data you are processing about me is not correct and I request to restrict the processing during the period of verification of the correctness of my personal data
- the processing of my personal data is illegal, but I object to the deletion of my personal data and instead find it sufficient to restrict its use
- I need my personal data to prove, exercise or defend legal claims
- based on my objection to the processing of personal data, I request to restrict the processing during the entire verification period, whether the operator's legitimate reasons for processing do not outweigh my legitimate reasons

Explanation:

..... (add a more detailed description of the situation)

Requested form of restriction of processing: ..... (specify if you also have a request for a specific form of restriction, e.g., temporary transfer of personal data to another processing system/prevention of user access to personal data affected by the restriction/temporary removal of published personal data on the website of the operator/other form)

Requested period of restriction of processing ..... (specify if you also have a request for a specific restriction period, e.g., for a period necessary for the defence of my legal claims, the termination of which I will inform you / for the period of verification of the request specified above / another period)

**(G) - non-processing of my personal data (I object to the processing of personal data)**, which you process about me in connection with..... (present the specification of the relationship with the operator or other circumstances in which personal data may be processed, which will help the operator identify your person)

Request details:

I object to the processing of my personal data based on:

(select one or more of the options which relates to your request)

- public interest or in the exercise of public authority entrusted to the operator
- legitimate interest of the operator or a third party

Explanation:

..... (add a more detailed description of the situation, e.g. I do not wish you to process my personal data for direct marketing purposes (including profiling))

**(H) - I am not subject to a decision based solely on the automated processing of personal data, including profiling**, which you process about me in connection with..... (present the specification of the relationship with the operator or other circumstances in which personal data may be processed, which will help the operator identify your person)

Request details:

..... (present specific requirements and reasonings of the request, e.g., since the above-mentioned processing may have adverse effects on me, such as ..... I request the processing of my data in a way other than exclusively automated)

If you have any questions or concerns, please contact me ..... (specify contact details, such as e-mail, phone number or address, etc.)

Thank you in advance for processing the request.

Sincerely

.....  
(name, surname, and signature of the person concerned)