

PERSONAL DATA PROCESSING INFORMATION

In connection with the adoption of Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (hereinafter referred to as the "GDPR Regulation") and Act No. 18/2018 Coll. on Personal Data Protection and on Amendments to Certain Acts (hereinafter referred to as the "Legislation"), which, with effect from 25 May 2018, apply to the processing of your Personal Data by BALU group s. r. o., with its registered seat at Považské Podhradie 390, Považská Bystrica 017 04, Company ID No. (IČO): 46 062 823, registered with the Commercial Register of the District Court Trenčín, Section: Sro, Insert No.: 24138/R (hereinafter referred to as the "**Company**"), as an employer, please find below a summary of basic information about the processing and protection of your Personal Data by the Company as a Controller.

1. Scope and Purpose of Personal Data Processing

As part of your employment with the Company, we will collect and process your following Personal Data and other information relating to your employment and/or agreement on work performed outside the employment relationship (hereinafter referred to as the "**Personal Data**") for the following purposes:

a) **Fulfilment of legal obligations of a Controller in the field of labour law and law in the area of social security and social protection and taxes:**

- name, surname and degree
- date and place of birth
- birth ID number
- permanent residence address or address for service (if different from the permanent residence address)
- the commencement of employment and its duration
- notice and other reasons for terminating the employment
- salary details
- documents on granting of bonuses
- illness notification
- contact details
- information about family members for tax purposes
- bank account details
- legal enforcement management
- health information (medical examinations, disability certificates, medical opinions and other health information and data in order to obtain a temporary stay)
- records of occupational and non-occupational accidents
- gender and nationality
- identity card number or passport number
- date of entitlement to old-age pension
- and other Personal Data pursuant to applicable laws

b) **Effective Human Resources Management within the Company**

- i) Personal Data necessary for the conclusion and performance of an employment contract or other agreement:
 - working conditions

- references
 - warnings
 - CV
 - difficulty level of a job position
 - confirmation of employment from previous job
 - information about education, certificates and testimonials
 - attendance records (employee's arrivals at and departures from the workplace)
 - and other Personal Data necessary to perform duties within an employment relationship or other similar relationship with the Company
- c) **Ensuring the Protection of the Company's Property, Financial Interests and Facilities and the Prevention and Detection of Crime:**
- video recordings of the physical appearance made by a camera system, through which the premises of the Company's building are monitored;
- d) **Control of fulfilment of work tasks and duties in accordance with Section 13 para. 4 of Act No. 311/2001 Coll., the Labour Code:**
- video recordings of the physical appearance made by a camera system, through which the surroundings of the Company's building are monitored;
 - records of motor vehicle position monitoring data (location data) in connection with the performance of work tasks during working time or business (official) trips, which were made in relation to the operation of the GPS system, with which some company motor vehicles are equipped;

2. Legal Basis for Processing of Your Personal Data

The legal basis for the processing of your Personal Data for the purpose set out in **Article 1, letter a) above** is the fulfilment of the legal obligations of the Controller as your employer. The provision of such Personal Data is a legal requirement. For this purpose, we may process your respective Personal Data even without your consent.

Processing of your Personal Data for the purpose stated in **Article 1, letter b) above** is necessary for the conclusion and performance of your employment contract or other similar agreement, as well as the fulfilment of legal obligations of the Controller. For this purpose, we may process your respective Personal Data even without your consent.

Processing of your Personal Data for the purpose stated in **Article 1, letter c) above** is necessary in order to fulfil and defend the Company's legitimate interests in the protection of property, financial interests and facilities and the prevention and detection of crime.

The legal basis for the processing of your Personal Data for the purpose set out in **Article 1., letter d) above** is the provision of Section 13 para. 4 of Act No. 311/2001 Coll., the Labour Code.

All Personal Data will be treated as confidential and will only be used for the intended purposes.

When processing your Personal Data, there is no automated individual decision-making or profiling as regards the data subject.

3. Place and Period of Storage

Documents containing your Personal Data will be stored/processed by non-automated means at the registered seat of the Company in the Slovak Republic, as well as by automated means within the Company's information systems.

Documents containing your Personal Data processed for the purpose referred to in **Article 1., letter a)** above will be kept for the period specified by the applicable legal regulations, in particular by Act No. 431/2002 Coll. on Accounting, as amended, Act No. 461/2003 Coll. on Social Insurance, as amended, and Act No. 580/2004 Coll. on Health Insurance, as amended, Act No. 95/2002 Coll. on Insurance and on Amendments to Certain Acts, as amended, and Act No. 595/2003 Coll. on Income Tax, as amended.

Documents containing your Personal Data processed for the purpose specified in **Article 1., letter b)** that are part of your personal file will be kept for a period of 70 years, unless the applicable laws or internal regulations of the Company do not provide for a specific (shorter) retention period for particular documents, which contain Personal Data (e.g. records of arrivals at and departures from the workplace are kept by the Company for a period of 3 years).

Video recordings made in connection with the operation of a camera system for the purposes set out in **Article 1., letter c) and d) above** are kept for 15 days from the video recording creation.

Your Personal Data processed in connection with the operation of a GPS system installed in motor vehicles for the purposes referred to in **Article 1., letter d) above** are kept by the Company for a period of 5 years.

4. Recipients of Personal Data

The recipients of your Personal Data may be, in particular, the competent public authorities, which are entrusted by law with powers and competences in the field of labour law, law in the area of social security and social protection and taxes. Under the conditions established by Act No. 5/2004 Coll. on Employment Services and on Amendments to Certain Acts and Act No. 404/2011 Coll. on Residence of Foreigners and on Amendments to Certain Acts, public authorities in the area of residence and employment of foreigners, in particular the Police Force of the Slovak Republic (the relevant police department of the Foreigner's Police) and other bodies.

In addition to the listed public authorities, your Personal Data may be disclosed to courts, bailiffs and law enforcement agencies.

In order to optimise the Company's internal procedures and activities (outsourcing), your Personal Data may be passed on to our external accounting, tax and legal advisors, auditors, as well as to entities providing services aimed at training of employees in the field of OSH and FP and/or verifying your medical fitness/professional competence.

Within the scope of Section 78 para. 3 of the Act, your Personal Data in connection with the performance of your work tasks may be provided to our Business Partners or otherwise disclosed.

There is no transfer of Personal Data to a third country or an international organisation.

5. Your Rights in Relation to the Personal Data Processing

In relation to the processing of your Personal Data, you have:

- **the right to clear, transparent and comprehensible information** about how the Company uses your Personal Data and what rights do you have (also this document serves that purpose);
- **the right of access** to Personal Data and to be provided with other information related to their processing by the Company;
- **the right to rectify** incorrect and to supplement incomplete Personal Data;
- **the right to delete** your Personal Data, in particular where:
 - they are no longer needed for further processing;
 - you have withdrawn your consent to their processing (see Article 6. below);
 - you have justifiably objected to their processing;
 - they have been processed unlawfully; or
 - they had to be deleted according to applicable laws;
- **the right to limit the processing** of your Personal Data if:
 - you have challenged the correctness of the Personal Data until their accuracy is verified by the Company;
 - the processing is unlawful;
 - the Company no longer needs them, but you need the data for the purpose of asserting your legal claims; or
 - you have objected to their processing until the Company verifies whether the legitimate interests of the Company outweigh your interests;
- **the right to object to the processing** of your Personal Data if they are processed by the Company:
 - for the purposes of direct marketing; or
 - for the purposes of the Company's legitimate interests
- **the right of transmission** of your Personal Data, i.e. the right to obtain your Personal Data that you have provided to the Company in a structured, commonly used and machine-readable format, and the right to transmit such data to another Controller; if technically possible, you have the right to require the Company to provide your Personal Data directly to another Controller;
- **the right to file a motion to initiate proceedings on Personal Data Protection** concerning the violation of your rights in the processing of your Personal Data by the Company; You may file your motion to initiate proceedings on Personal Data Protection with the local supervisory authority, namely with the Office for Personal Data Protection, Hraničná 12, 820 07 Bratislava 27; <https://dataprotection.gov.sk>.

Further information regarding your Personal Data will be provided to you, within the Company, by the person authorised for Personal Data Protection (see Article 7 below).

6. Right to Withdraw Your Consent

You may withdraw your consent to the processing of your Personal Data (in cases where it is required) at any time in writing at the Controller of your Personal Data (Article 7 below) or by directly contacting the person authorised for Personal Data Protection at the e-mail: balu@balugroup.sk

However, the withdrawal of your consent will not affect the lawfulness of the processing of your Personal Data based on your consent, which has been granted before its withdrawal.

Withdrawal of your consent is not effective in relation to your Personal Data, which are necessary for the fulfilment of the legal obligation of the Company, especially in the field of labour law and law in the area of social security and social protection of employees and taxes (Article 1., letter c) above), for the performance of the employment contract (Article 1, letter b) above) or for the protection of the legitimate interests of the Company.

7. Identity and Contact Details of the Controller and Joint Controllers

The Controller of your Personal Data is our Company:

BALU group s. r. o.
Považské Podhradie 390, Považská Bystrica 017 04
Company ID No. (IČO): 46 062 823

Contact details of the person authorised for the Personal Data Protection:

e-mail: balu@balugroup.sk
Phone No.: +421 917 977 552

8. Personal Data Protection

To ensure the safety and confidentiality of your Personal Data, which is especially important for the Company, we use technical and organisational measures namely for the protection against unauthorised access to data and their misuse, to ensure the security of the Company's IT systems and for data recovery in the event of any incident. Where appropriate, we use encryption to protect your Personal Data. We regularly evaluate and update all measures.

The Personal Data Processing is done manually in electronic information systems, which are subject to physical, technical and procedural control. In order to protect the data, we have implemented a security mechanism including technical, organisational and personnel measures.