

Information obligation of the company prepared in accordance with the Law on Personal Data Protection

Identification data of the Controller:

GetOn, s. r. o., Reg. No. (IČO): 36720895, Štúrova 19/3, 811 02 Bratislava, registered in the Commercial Register of the District Court Bratislava I, Section: sro, File No.: 119986/B (hereinafter referred to as the "**Company**"), acts in the processing of personal data of its employees, clients, customers or business partners (hereinafter referred to as "the data subject") as the Controller of the information systems (hereinafter referred to as "**IS**").

Legal basis for the processing of personal data of data subjects:

When processing personal data, the company proceeds in accordance with Act no. 122/2013 Coll. on the Protection of Personal Data and amending certain other laws (hereinafter referred to as the "**Data Protection Law**"). The legal basis for the processing of personal data is the Personal Data Protection Law, special legal regulations and consent to the processing of personal data, depending on the purpose of the processing of personal data.

If the purpose of the processing of personal data, and the group of persons concerned and the list of categories of personal data are determined by a directly enforceable act of the European Union, an international treaty by which the Slovak Republic is bound, or a law on personal data protection or a special law, the Company is authorized, within the meaning of § 10 of the Personal Data Protection Law, to process personal data without the consent of the data subjects.

The Company processes personal data without the consent of the data subject, if the purpose of the processing of personal data, the group of persons concerned and the list of categories of personal data or their scope are determined directly by a legally binding act of the European Union, an international treaty by which the Slovak Republic is bound or this Law. If the categories or scope of personal data are not so determined, the Company may process personal data only to the extent and in the manner necessary to achieve the declared purpose of processing while observing the basic obligations set out in § 6 Sect. 2 c) through f) and i) of the Personal Data Protection Law.

The Company further processes personal data without the consent of the data subjects, if the purpose of the processing of personal data, the group of persons concerned and the categories of personal data are stipulated by a special law, and only in the scope and manner so stipulated by such special law. The processed personal data may be provided, made available or published from the Company's information system only for the purpose recognized as legitimate by a special law, while observing the categories of personal data that may be provided, made available or published, as well as third parties to whom personal data may be provided, or the range of recipients to whom personal data may be made available, as stipulated in such special law, unless otherwise provided by the Personal Data Protection Law.

The Company also processes personal data without the consent of the data subject, if:

- a) the processing of personal data is necessary for the performance of a contract involving the data subject as one of the contracting parties, or in a pre-contractual relationship with the data subject or when negotiating an amendment to the contract at the request of the data subject;

- b) the processing of personal data is necessary to protect the life, health or property of the data subject,
- c) the processing involves exclusively the title, name, surname and address of the data subject without the possibility of assigning other personal data to them and their use is intended solely for the needs of the Controller in postal communication with the person concerned and registration of these data,
- d) the personal data in question had already been published in accordance with the law and have been duly designated by the Controller as so disclosed; the person who claims to process the personal data that had been disclosed earlier must upon request prove to the Office that the personal data processed had already been lawfully published before,
- e) the processing of personal data is necessary for the protection of the rights and the legitimate interests of the Controller or of a third party, except where the fundamental rights and freedoms of the data subjects subject to protection under this Law prevail in such processing of personal data.

If, due to the purpose of the processing of personal data stipulated in a directly enforceable legal act of the European Union, an international treaty by which the Slovak Republic is bound, or a law on personal data protection or a special law it is not possible to specify in advance the individual categories of personal data which are to be processed, the categories of personal data may be replaced by the scope of personal data.

The Company is obliged to proceed in such processing of personal data pursuant to § 6 Sect. 2 (d) of the Personal Data Protection Law, except for the cases when personal data are processed for the purposes of and in connection with legal proceedings.

If the provisions of § 10 of the Personal Data Protection Law does not apply to the processing of personal data, the Company as a Controller is entitled to process personal data only with the consent of the data subjects.

The Company obtains the consent of the data subjects without coercion and enforcement, as well as without threatening with rejection of a contractual relationship, or provision of services or obligations for the Controller arising from legally binding acts of the European Union, or from any international treaty by which the Slovak Republic is bound or from any other law.

In the event of refusing to provide the Company with personal data for purposes of the provision of services or the fulfilment of legal obligations, the Company may notify the person concerned of possible consequences of such refusal to provide their personal data.

The persons concerned, i.e. the data subjects agree that the Company assigns the processing of personal data to a processor who is usually assigned with processing of personal data on behalf of the Company. Upon elapsing of the purpose of processing of personal data, the Company will dispose of all personal data obtained legally from the data subjects within the period stipulated by the applicable legal regulations and in accordance with the Company's internal rules.

Purpose of processing of personal data of data subjects:

The Company respects your privacy and considers and treats the personal information provided as confidential.

The Company needs to know some of the personal data of the data subjects in order to ensure the quality of its services, and needs to provide these data to certain other recipients in order to fulfil its own legal obligations as well as to ensure the highest quality of its services.

The Company processes the personal data provided for several purposes.

First, it processes personal data of job seekers and the data of its employees in the process of administration of the personnel and payroll agenda, and in fulfilling its legal obligations arising from the related special legislature.

Furthermore, the Company processes personal data of its clients, customers and business partners in order to ensure its business activities, taking respect to the interests of its clients, customers and business partners.

The Company does not process personal data for other purposes than those declared herein, which means that the Company collects, stores and processes only such personal data of the data subjects which are necessary for due provision of its services. The personal data provided are strictly protected against misuse by third parties by the means that are documented in the adopted security project and the security directive which both are in line with § 19 of the Personal Data Protection Law.

Pursuant to the Personal Data Protection Law, the Company is responsible for supervision over the protection of personal data processed. For that purpose the Company has designated a responsible person who is in charge of watching the compliance with the statutory provisions regarding the processing of personal data and is registered with the Office for Personal Data Protection of the Slovak Republic.

When processing personal data of the data subjects, the Company adheres to the basic obligations of the Controller stipulated in § 6 of the Personal Data Protection Law, which includes, but are not limited to the following:

The Company always uses the provided personal data for a predetermined purpose, which is unambiguous, clearly defined and specific, and in line with the Constitution of the Slovak Republic, constitutional laws, laws and international treaties by which the Slovak Republic is bound.

The Company always defines the conditions for the processing of personal data in such a way as not to restrict the rights of the data subject specified by law.

The Company collects only those personal data of the data subjects which by their size and content correspond to the purpose of the processing and are necessary for its achievement.

The Company ensures that the personal data of the data subjects are processed exclusively in a manner consistent with the purpose, declared in advance, for which they were collected.

The Company, as the Controller, is required to process only the correct, complete and, where necessary, updated personal data in relation to the purpose of the processing. The Controller is required to block any incorrect and incomplete personal data and correct or supplement them without undue delay, and if this cannot be adequately, the Company must clearly mark such data as incorrect or incomplete and dispose of them without undue delay.

The Company ensures that the personal data of the data subjects are processed in a form that allows the individual data subjects to be identified for no longer than is necessary to achieve the purpose of the processing.

Those personal data, purpose of processing of which has elapsed, shall be disposed of by the Company in the prescribed manner. After elapsing of the defined purpose, the Company may process personal data in their anonymised form, in the extent necessary, for research or statistics. The personal data thus processed must not be used by the Controller to support measures or decisions taken against the data subjects in order to limit their fundamental rights and freedoms.

The Processors:

The Company shall not disclose your personal information to third parties contradictory to the Data Protection Law and for the purpose of their collection, nor in contradiction to your interests or instructions, and it provides them to third parties only for the defined purpose as specified above.

Within its business activities, the Company cooperates with a number of processors aiming to provide quality services, while in carrying out their contractual activities, these entities process the personal data of the data subjects.

The Company honestly declares that in selecting individual processors, it took into account their professional, technical, organizational and personnel capabilities and their ability to ensure security of personal data processed through the series of adopted security measures, as required by the Personal Data Protection Law.

At the same time, when selecting the appropriate processor, the Company proceeded in such a way so that the rights and interests of the data subjects were not endangered.

Acting pursuant to § 8 of the Personal Data Protection Law, the Company, as the Controller, has entered into agreements with the processors to ensure the protection of personal data processed by the processors, while the processors have been authorized to the processing of personal data of the data subjects only to the extent, under the conditions and for the purpose agreed in the contract and in a manner consistent with the Personal Date Protection Law.

The extent and the list of categories of personal data processed:

The Company processes personal data of data subjects in its information systems in the extent necessary to achieve the intended purpose. This extent is limited by stipulations of special legal regulations or by consent of data subjects to the processing of their personal data.

The Company processes personal data provided to it by the data subjects only voluntarily and in the extent necessary. The provision to the Company of personal data beyond the scope of special laws is voluntary.

Terms and conditions for the processing of personal data of data subjects:

The Company processes personal data of the data subjects in its information systems by automated and non-automated means.

The Company does not disclose the processed personal data, except when required by a special legal regulation or decision of court or other state authority.

The Company will not process your personal data without your express consent or on another legal basis for other purposes or to a greater extent than stated in this information and provided for in the registration sheets of the Controller's individual information systems.

Rights of data subjects related to the processing of their personal data:

The data subjects have the right upon written request to require from the Company:

- a) to confirm whether or not their personal information are processed;
- b) information, given in a generally comprehensible form, on the processing of personal data in the information system in the extent set forth in § 15 Sect. 1 (a) through (e), second to sixth points of the Personal Data Protection Law; and when issuing a decision under § 28 Sect. 5 of the Personal Data Protection Law, the data subject is entitled to be informed on the methods of processing and evaluating operations;
- c) accurate information, given in a generally comprehensible form, on the source from which it obtained their personal data for processing;
- d) a list of their personal data which are subject to processing, provided in a generally comprehensible form;
- e) correction or destruction of their incorrect, incomplete or outdated personal data that are subject to processing;
- f) destruction of those of their personal data purpose of processing of which has elapsed; and if the processing involved official documents containing personal data, return of such documents,
- g) destruction of their personal data that are subject to processing where there is an infringement of Law;
- h) when the Company processes personal data on the basis of the consent of the data subject, blocking of the use of personal data if the data subject withdrew their consent prematurely.

The rights of the data subjects provided under (e) and (f) above may be restricted only if such a restriction results from a special law or if exercise of these rights would violate the protection of the data subject or infringe the rights and freedoms of other persons.

According to § 28 Sect. 3 of the Personal Data Protection Law, the data subject has the right to object by a written request addressed to the Company:

- a) to the processing of their personal data, which they assume are or will be processed for direct marketing without their consent, and request their destruction;
- b) to the use of personal data referred to in § 10 Sect. 3 (d) of the Personal Data Protection Law for the purposes of direct marketing in postal communication; or
- c) to the provision of personal data referred to in § 10 Sect. 3 (d) of the Personal Data Protection Law for the purposes of direct marketing.

According to § 28 Sect. 4 of the Personal Data Protection Law, the data subject has the right – which is to be exercised by a written request addressed to the Company or personally, if the matter cannot be deferred – to object to the processing of personal data in cases under § 10 Sect. 3 (a), (e), (f) or (g) of the Personal Data Protection Law by stating legitimate reasons or by providing evidence of unlawful interference with their rights and interests protected by law, which under specific circumstances are or may be harmed by such processing of personal data; and if it shows that the data subject's objection was justified, unless this is precluded by lawful reasons the Company is obliged to block and destroy the personal data which the data subject has objected to without delay, as soon as circumstances allow it.

According to § 28 Sect. 5 of the Personal Data Protection Law, the data subject is entitled, at the written request addressed to the Company or personally, if the matter cannot be deferred, to oppose at any time and not subject to the decision of the Company which has legal effect or significant impact on them if such decision was made solely on the basis of the acts of the automated processing of their personal data. Furthermore, the data subject has the right to request the Company to review the issued decision by a method different from the automated form of processing, whereby the Company shall be obliged to comply with the request of the data subject, so that the decisive role in the review of the decision will lie with the Controller's authorized person; the method of the review and the finding shall be notified by the Controller to the data subject within the time limit specified in § 29 Sect. 3 of the Personal Data Protection Law. This right, however, does not lie with the data subject if it is provided for by a special law providing for the measures to safeguard the legitimate interests of the data subject, or if, in the context of pre-contractual relationships or during the existence of contractual relationship, the Controller has issued a decision to comply with the request of the data subject, or if the Controller based on the contract has taken other appropriate measures to ensure the legitimate interests of the data subject.

If the data subject exercises their right:

- a) by a written request and it is apparent from the content of such their request that they seek to exercise their right, under the Personal Data Protection Law such request is deemed to have been duly filed; the request submitted by electronic mail or by fax must be delivered by the data subject also in writing no later than three days from the date of its submission through the aforementioned electronic means;
- b) in person, by oral request, this must be recorded in the minutes, from which it must be clear who has exercised the right, what he is seeking and when and by whom the minutes have been drawn up. Furthermore, the minutes must contain signature of the recorder as well as the signature of the data subject concerned, and the Company is obliged to give one copy of the minutes to the data subject;
- c) by either of the procedures described in (a) or (b) above, but with the processor, the processor is required to submit the written request or the minutes containing the oral request to the Company without undue delay.

If the data subject suspects that their personal data are being processed unlawfully, they may file a motion to institute the proceedings on the protection of their personal data with the Office for Personal Data Protection of the Slovak Republic at Hraničná 12, 820 07 Bratislava 27, Slovak Republic, or they may contact the Office through their web site <http://www.dataprotection.gov.sk>.

If the data subject concerned does not have full legal capacity, they may exercise their rights through their legal guardian.

If the data subject concerned is not alive anymore, a close person may exercise their rights on their behalf under this Law.

Requests by the data subject placed pursuant to § 28 Sect. 1 (a) through (c), (e) through (h) and Sect. 3 through 5 of the Personal Data Protection Law, shall be handled by the Company free of charge.

Unless provided otherwise by a special law, requests by the data subject placed pursuant to § 28 Sect. 1 (d) of the Personal Data Protection Law shall be handled by the Company free of charge up to the amount of purposefully incurred material costs associated with making copies, with the acquisition of technical media and with the sending of information to the data subject.

The Company is obliged to respond in writing to the data subject in accordance with § 28 Sect. 1 and 2 of the Personal Data Protection Law no later than 30 days from the date of receipt of the request.

In case of restriction of the data subject's rights under § 28 Sect. 2 of the Personal Data Protection Law, the Company shall notify the data subject and the Office for Personal Data Protection in writing accordingly without undue delay.

By issuing this document, the Company informed you, as the data subject, about the protection of your personal data and instructed you about your rights in relation to the protection of your personal data within the scope of its written information duty.

Given at Bratislava, on this 27 June 2019

[signature and stamp; within:
GetOn, s.r.o., Štúrova 19/3,
811 0 Bratislava, Co. ID
36 720 895, VAT ID:
SK2022306209]

.....

GetOn, s. r. o.

