

## Personal Data Processing Information

CHEMOLAK a.s. pays great attention to the security of personal data processing of data subjects and compliance with the principles of legal processing of personal data and prevention of unauthorized interference with the rights of individuals.

Pursuant to Article 13 of Regulation (EC) No 2016/679 of the European Parliament and of the Council, as of April 27, 2016. on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and in accordance with Article 19 of Act No. 18/2018 Coll. on the Protection of Personal Data and on the Amendment and Supplementation of Certain Acts (hereinafter as Personal Data Protection Act)

Operator:  
Business Name: **CHEMOLAK a.s.**  
Registered office: **Továrenská 7,919 04 Smolenice**  
Company ID (ICO): **31 411 851 Tax ID: 2020391472 VAT ID:SK 2020391472**  
Registration: **Commercial Register of the District Court Trnava, Section Sa, Insert 67 / T**  
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provides the persons concerned with the following information about their rights to the processing of personal data and the operator's access to the processing of the personal data:

Processing activities (Purpose of personal data processing):

In order to fulfil the legal obligations and to ensure the business activities, the operator needs to know some personal data of the persons concerned and process them for those purposes. This is personal data of job seekers, personal data of employees for the purposes of personnel agenda and payroll, providing meal vouchers, health and safety at work and for ensuring safety and protection of life and health, including fire protection, employee insurance and related legal obligations resulting from special legal regulations, investigation of complaints under Act No. 307/2014 Coll. on certain measures relating to the reporting of anti-social activities and on the amendment and supplementation of certain acts, as amended, compliance with legal obligations resulting from tax or accounting regulations, fulfilling the obligations arising from § 7 par. 10 et seq. of the Act No.179 / 2011 Coll. on Economic mobilization and on the amendment and supplementation of Act No. 387/2002 Coll. on State Management in Crisis Situations Beyond War and War Time, as amended, compliance with legal obligations in connection with the provision of accommodation services; fulfilment of legal obligations related to the drafting of contracts, preparation and securing of mandates, powers of attorney, licenses and permits, registry administration and archiving, etc.

In addition to the above, the Operator also processes personal data of shareholders, clients, customers and business partners to ensure the business activities, taking into account the interests of their clients, customers, business partners.

**The operator collects, stores and processes personal data of the data subjects that are needed for business purposes.** The personal data provided is protected against misuse by third parties by means specified in the internal security directive.

When processing personal data of data subjects, the operator complies with the basic legal obligations of the operator. The operator always uses personal data provided for a predetermined purpose of processing, which is clear, defined and specific, while complying with the Constitution of the Slovak Republic, constitutional laws, laws and international treaties, by which the Slovak Republic is bound.

Operator always defines the conditions for the processing of personal data in such a way that the rights of the person concerned stipulated by law are not restricted.

**Operator only acquires personal data of the data subjects, which by their size and content, are relevant to the purpose of the processing and are necessary to achieve it.**

Operator shall ensure that personal data of the concerned persons are processed exclusively in a manner consistent with the announced purpose, for which they were collected.

The operator only processes the correct, complete and, where necessary, updated personal data in relation to the purpose of the processing. Incorrect and incomplete personal data is blocked by the operator and corrected or supplemented without undue delay, if this is not possible, such personal data is clearly marked and destroyed without undue delay.

Operator respects privacy and considers the provided personal data confidential.

**Operator processes** personal data of data of its employees, clients, customers or business partners in the partners (hereinafter referred to as following processing activities (hereinafter referred to as "processing") "affected persons") activities "):

**Payroll and HR agenda****Temporary staff - processing through an intermediary****Agency staff - processing through an intermediary****List of shareholders**

Economic mobilization

Accounting Documents

**Business Partners Registration / Contracts with Individuals****Complaints Reporting System****Complaints of natural persons**

Legal disputes with natural persons

**Reporting Anti-Social Activities by Employees / External Individuals**

Camera system (internal and external) processing through an intermediary

**One-Time Access to Operator Premises - processing through an intermediary****Catering or Meal vouchers - processing through an intermediary****Benefits - processing through an intermediary****Marketing****Registry Management****Accommodation Registration****Staff training - Processing through an intermediary****Language learning - processing through an intermediary****Loyalty program**

Consumer Competition

**Attendance System****Staff insurance - Processing through an intermediary**

Employee Health Checks - processing through an intermediary

**Fuel Cards - processing through an intermediary****LEGAL BASIS:**

The legal basis for processing is set out in Art. 6 para. 1 a) to f) of the **Regulation of the European Parliament and EU Council 2016/679, as of April 27, 2016, on the protection of individuals with regard to the processing of personal data and on the free movement of such data** and in § 13 para. a) to f) of **Act no. 18/2018 Coll. on the Protection of Personal Data and on the Amendment and Supplementation of Certain Acts**.

**Processing of personal data to fulfil legal obligations.**

**In this case, the data subject's consent is not required** and the data subjects are obliged to bear such processing of their personal data and to provide such data for processing. Without providing their personal data, the operator could not fulfil the legal obligations, which can have a negative impact on both the operator and the data subject.

The legal obligations derive in particular (but not exclusively) from the following legislation in the current version:

- Regulation (EC) No 2016/679 of the European Parliament and of the Council, as of April 27, 2016, on the protection of individuals with regard to the processing of personal data and on the free movement of such data
- Act No. 18/2018 Coll. On Personal Data Protection, as amended
- Act No. 513/1991 Coll. Commercial Code, as amended
- Act No. 40/1964 Coll. Civil Code, as amended
- Civil Procedure Code (Act No. 160/2015 Coll.), as amended
- Criminal Code (No. 300/2005 Coll.), as amended
- Act on Offenses (No. 372/1990 Coll. on Offenses), as amended
- Act No. 71/1967 Coll. Administrative Code, as amended
- Act No. 311/2001 Coll. Labour Code
- Act No. 461/2003 Coll. on Social Insurance
- Act No. 558/2004 Coll. on Health Insurance and on Amendments to the Act on Insurance and on Amendments to Certain Acts
- Act No. 595/2003 Coll. Income Tax Act, as amended
- Act No. 462/2003 Coll. on income reimbursement in case of temporary incapacity of the employee, as amended
- Act No. 5/2004 Coll. on Employment Services, as amended

- Act No. 152/1994 Coll. on the Social Fund, as amended
- Act No. 283/2002 Coll. on Travel Compensation, as amended
- Act No. 124/2006 Coll. on Health and Safety at Work.
- Act No. Act No. 595/2003 Coll. Income Tax Act, as amended
- Act No. 233/1995 Coll. On Bailiffs and Execution Activities, as amended
- Act No. 395/2002 Coll. on Archives and registers and on the Amendment to certain Acts
- Act No. 431/2002 Coll. on Accounting (No. 431/2002 Coll.), as amended
- Act No. 307/2014 Coll. on certain measures related to the reporting of anti-social activities.
- Act No. 496/2002 Coll. on Reporting the Residence of Citizens of the Slovak Republic and the Population Register (
- Act No. 179/2011 Coll. on Economic Mobilization and on Amendments and Supplements to Act No. 387/2002 Coll. on state management in crisis situations outside war and war times and other generally binding legal norms

#### **Processing of personal data due to contractual obligations:**

Operator processes personal data necessary for the performance of the contract (e.g. purchase, gift, rent, work contract, etc.), to which the concerned person is a party, or to take action prior to the conclusion of the contract at the request of the concerned person. Even in this case, the operator is entitled to obtain personal data directly from of the data subject without his consent. In particular, the purpose of the above-mentioned processing is:

- a) administration of the relationship with the person concerned before employment relationship or similar relationship (so-called pre-contractual relations)
- b) preparation of contracts with individuals (e.g. related to movable and immovable property) and their internal records and administration,
- c) handling requests for financial support or material donations and offers for advertising partnerships, including preparation and administration of relevant contracts, ensuring the participation of natural persons in corporate events.

#### **Processing of personal data due to the legitimate interest of the operator.**

The legitimate interests of the operator include:

- a) ensuring safety, protection of life and health, protection of property and valuables while entering, moving and exiting the operator's premises and facilities
- b) processing and issuing personal identification cards for permanent and temporary permits of the concerned persons to enter the premises of the operator,
- c) evidence of security and other professional training of suppliers,
- d) fulfilment of the operator's obligations related to compliance with obligations arising from occupational safety and protection of health regulations, compliance with OSH principles, investigation of adverse events,
- e) CCTV monitoring, in particular to protect the operator's and person's assets entering the premises of the operator, protection of life and health of these persons, observance of OSH principles, investigation of adverse events, including monitoring of the movement of natural persons entering the operator's premises, prevention and detection of possible criminal activity
- f) internal audit activities,
- g) handling court, offense and criminal proceedings,
- h) dealing with the agenda related to the recovery of the claims of the persons concerned,
- i) implementing measures related to the requirements of the anti-terrorist legislation
- j) business relationship administration and execution of business transactions with business partners, (background checks of business partners, recording contact data of their employees, archiving mail communication)
- k) web site administration

#### **Processing of personal data based on the consent of the data subject**

If personal data is not processed by the above-mentioned methods, personal data is processed by the operator in exceptional and isolated cases on the basis of voluntarily granted consent of the data subject for purposes specified in the consent, such as making or using a photograph, inclusion in the jobseekers register, participation in company events. The provision of personal data by consent is voluntary and based on the free will of the subject. The data subject has the right to withdraw his consent at any time by delivering a written withdrawal of the consent to the address of the registered office of the operator. In doing so, the withdrawal of consent does not affect the lawfulness of the processing based on the consent prior to its withdrawal.

Older consents that have been expressed in accordance with the terms of GDPR remain valid. Other older consents lose their validity and in case the purpose continues, personal data is processed under a different legal basis.

Operator obtains the consent of the data subject without coercion and enforcement, as well as without the threat of rejection of the contractual relationship, the services provided or the operator's obligations.

from legally binding acts of the European Union, an international treaty binding the Slovak Republic or a law.

**In the event of refusal to provide personal data to the operator for purposes necessary to perform contractual obligations, to provide services or to comply with legal obligations, the operator is entitled to notify the data subject of the possible consequences of not providing personal data!**

**Processing of personal data through intermediaries:**

When processing personal data, the operator entrusts such processing to intermediaries who process personal data on behalf of the operator. Upon termination of the purpose of processing personal data, the operator shall dispose of these legally acquired personal data of the persons concerned within the period stipulated by the applicable legal regulations and in accordance with the company's internal regulation.

In its business activities, the operator cooperates with a number of intermediaries aiming to provide quality services, while these entities process the personal data of the data subjects in the performance of their contractual activity.

Operator honestly declares that when selecting individual intermediaries, the operator pays attention to their professional, technical, organizational and personnel capabilities and their ability to guarantee the security of the processed personal data by adopted security measures pursuant to the Personal Data Protection Act.

At the same time, when selecting a suitable intermediary, the operator shall proceed in such a way that the rights and interests of the persons concerned are not jeopardized.

Under the Personal Data Protection Act, the operator has entered into written agreements with the intermediaries to ensure the protection of personal data processed by intermediaries, which the operator entrusted with the processing of personal data of the persons concerned only to the extent, under the terms and conditions agreed in the contract and in accordance with the Personal Data Protection Act.

The operator instructed the following intermediaries to process personal data:

Plastika,a .s.

MY STAV, s.r.o.

SBS T.I.B.

MEDO, spol. s r.o.

Slovenské liečebné kúpele Piešťany, a.s.

Kúpele Dudince, a.s.

JAZIERCE, s.r.o.

VALLIS- jazykové vzdelávanie, s.r.o

PHDr. Anna Karásková

NN Tatry sympatia, d.d.s. as.

AXA, d.s.s., a.s.

OMV Slovensko, s.r.o.

DK PRAKTIK s.r.o.

**Extent and list of processed personal data :**

**List of processed personal data:**

First name, surname, title

Surname at birth

Date of birth

Place of birth

Birth number

ID number:

Place of permanent or temporary residence

Status

Nationality

Education

Knowledge (language, computer, other)

Personal number:

Health (changed work ability, disability) to the extent necessary to assess work capacity

Citizenship

Phone Number

E-mail address

The operator processes in his information systems the personal data of the persons concerned **in the range needed to achieve the intended purpose**. This is mainly the scope of personal data provided by special legislation or to the extent of the data subject's consent to the processing of personal data.

The operator only processes personal data provided to him by the data subject voluntarily and to the extent necessary. The provision of personal data to the company beyond the scope of special laws is voluntary.

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

The operator processes personal data of the concerned persons by both automated and non-automated means of processing.

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

Operator shall not process personal data of the data subjects without express consent or other legal basis for any other purpose or to a greater extent than specified in this information and in the records of each operator's processing activities.

Retention period of personal data of data subjects

The operator processes personal data for the duration of the processing purpose and stores and keeps them for the period stipulated by the relevant laws, the applicable internal regulation - the Registry Rules for the Administration of the CHEMOLAK a.s. and the Company's Registry Plan.

### **Data Subjects**

Data subjects (concerned persons) are in particular:

- a) potential employees of the company, employees of the company, spouses of employees, dependent children of employees, parents of dependent children of employees, close persons, temporary employees,
- b) participants of legal relations (contractual, judicial, etc.) with the operator,
- c) other entities on the basis of legal regulations established by law (consent of the person concerned, contract, or special law)
- d) members of statutory bodies, representatives of counterparties authorized to act in contractual matters and employees of business partners
- e) business partners, natural persons on the basis of contracts between the operator and the intermediary
- f) shareholders,
- g) consumers, customers,
- h) visitors, persons entering the operator's premises

Rights of data subjects

Data subjects (persons concerned) may exercise the following rights in the processing of their personal data:

**Right to Information** - Data subjects can request confirmation of whether and **to** what extent their personal information is processed.

**Right to Correction** - Data subjects may request correction or supplementing of their personal data, if operator processes incomplete or incorrect personal data

**Right to Deletion** - Data subjects may request the deletion of their personal data, if the reason, why they were collected, does not longer exist, processing interferes disproportionately with their legitimate protected interests, or the processing of data is based on their consent and the person concerned has withdrawn the consent. There may be other reasons that may contradict the immediate deletion of personal data, e.g. statutory periods of deposit, ongoing proceedings, enforcement, exercise or defence of legal claims, etc.

**Right to Processing Restrictions** - Data subjects may request a limitation of the processing of personal data when they deny the accuracy of this data for a period that will allow the operator to verify the data, the processing of personal data is unauthorized, but the person refuses deletion and instead the data subject may request a restriction on the use of the data, the operator no longer needs the data for the intended purpose but needs such data for the exercise, enforcement or defence of claims, or the data subjects have objected to the processing.

Right to Data Transfer - Data subjects have the right to obtain personal data relating to them and which have been provided to the operator in a structured, normal and machine readable format, if personal data were obtained by consent, in accordance with the law or under contract, and the processing is carried out using automated procedures.

Right to Objection - Data subjects may object to the processing of the data if there is a decisive interest for the protection of the personal data of the data subject, if the operator processes personal data for the purpose of invoking the need to protect the data subject's legitimate interests.

Right to Complaint - Data subjects may make inquiries or may complain, should they be under the impression that the processing of their personal data violates the Slovak or European Data Protection Act and thus their rights are affected. The complaint may be lodged by the data subject directly at CHEMOLAK a.s. with a notice at the registered office of the company, or by e-mail to: [osobneudaje@chemolak.sk](mailto:osobneudaje@chemolak.sk) Should you not be satisfied with handling of your complaint, you have the right to request the commencement of proceedings by the control body, which is the Úrad pre ochranu osobných údajov (Office for Personal Data Protection), Hraničná 12, 820 27 Bratislava 27, or by European Supervisory Authority.

Should you have any questions about the processing of your personal information, please contact us at: [osobneudaje@chemolak.sk](mailto:osobneudaje@chemolak.sk)

In Smolenice, May 21, 2018