

Notice of Personal Data Processing

pursuant to Article 13 of the REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and Act no. 18/2018 on the Protection of Personal Data as amended.

A. Identification data of the Controller:

Controller: **Asseco CEIT, a.s.**, with its registered office Univerzitná 8661/A, 010 08 Žilina, IČO: 449 646 76 (hereafter “Controller”)

B. Purpose of processing personal data by the Controller:

Processing of data for the following purposes:

- sending email advertisements,
- sending newsletters and offers of events and webinars,
- sending commercial offers,
- personalised contact by the salesperson,
- responding to the requests of data subjects

C. List of personal data:

- name, surname,
- address,
- telephone number,
- email address,
- company name,
- job

D. Additional information

1. Personal data within the scope of Article C. processed for the purpose of processing requests from data subjects pursuant to Article 6(1)(c) of Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR) - the processing of personal data is necessary pursuant to a specific regulation or international treaty to which the Slovak Republic is bound.
2. Personal data in the following scope: name, surname, address, telephone number, email address, processed for the purpose of sending commercial offers pursuant to Article 6(1)(b) - The processing is necessary for the performance of a contract to which the data subject is a party, or to carry out pre-contractual measures at the request of the data subject
3. Personal data in the scope of name, surname, address, telephone number, email address, processed for the purpose of sending email advertisements, sending newsletters and offers of events and

webinars, personalized contact by the salesperson pursuant to Article 6 (1) (a) of Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR) - on the basis of the data subject's consent.

4. Personal data will be disclosed to third parties according to the law (control bodies of state institutions) and to intermediaries, namely the companies: **Mailchimp c/o The Rocket Science Group, LLC, MailerLite Ltd, Google Ireland Limited, Microsoft Ireland Operations Limited), Automattic, Inc. (Wordpress), LinkedIn Ireland Unlimited Company, Meta Platforms Ireland Limited, Seznam.cz, a.s., Twitter International Unlimited Company** (hereafter "Intermediaries") on the basis of contracts.
5. The Controller declares that when selecting intermediaries, it has taken into account their professional, technical, organisational and personal competence and their ability to guarantee the security of the processed personal data by means of measures pursuant to Act No.18/2018 Coll. on the protection of personal data and Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR).
6. The Controller declares that it has taken all measures pursuant to Act No 18/2018 Coll. on the protection of personal data and Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR) and hereby undertakes to protect such data against accidental as well as unlawful damage and destruction, accidental loss, alteration, unauthorised access and disclosure as well as against any other inadmissible forms of processing within the meaning of the measures adopted in the personal data protection impact assessment.
7. The Intermediary undertakes to process personal data only to the extent and under the conditions agreed in the mandate of the Intermediary for the processing of personal data.
8. The Controller declares that it will not provide personal data to intermediaries other than those listed in this notice.
9. The Controller declares that it will collect personal data to the extent necessary for the fulfilment of the stated purpose and process it only in accordance with the purpose for which it was collected.
10. The Controller is obliged to maintain the confidentiality of the personal data they process. The obligation of confidentiality shall continue even after the processing of personal data has been terminated.
11. The company does not have a defined responsible person. Contact details for exercising your rights: gdpr@asseco-ceit.com.

E. Archiving period of personal data:

1. Agenda for sending email advertisements – 3 years
2. Sending newsletters and offers of events and webinars -3 years
3. Agenda for sending commercial offers– 3 years
4. Agenda for personalised contact by the salesperson - 3 years
5. Records of rights exercised by data subjects pursuant to Act No. 18/2018 Coll. on the Protection of Personal Data and on amendments and supplements to certain acts - 3 years

F. Information on the rights of the data subject:

Right to access

1. The data subject has the right to obtain confirmation from the Controller as to whether personal data relating to him/her are being processed and, if so, to obtain access to that personal data and the following information:

a) purposes of data processing;

- b) categories of personal data;
 - c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
 - d) where possible, the expected period of storage of the personal data or, if this is not possible, the criteria for determining it;
 - e) the existence of the right to require the Controller to rectify or erase personal data relating to the data subject or to restrict or limit the processing or to object to such processing;
 - f) the right to complain to the supervisory authority;
 - g) if the personal data was not obtained from the data subject, any available information as to its source;
 - h) the existence of automated decision-making, including profiling as referred to in Article 22(1) and (4) of the Regulation and, in such cases, at least meaningful information about the procedure used as well as the significance and foreseeable consequences of such processing for the data subject.
2. Where personal data is transferred to a third country or an international organisation, the data subject has the right to be informed of the appropriate safeguards under Article 46 of the Regulation relating to the transfer.
 3. The Controller shall provide a copy of the personal data being processed. For any additional copies requested by the data subject, the Controller may charge a reasonable fee corresponding to the administrative costs. Where the data subject has made the request by electronic means, the information shall be provided in a commonly used electronic form, unless the data subject has requested otherwise.
 4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.

Right to rectification

The data subject shall have the right to have inaccurate personal data concerning him/her rectified by the Controller without undue delay. With regard to the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by providing a supplementary declaration.

Right to erasure (“forgetting”)

1. The data subject shall also have the right to obtain from the Controller the erasure of personal data concerning him/her without undue delay, and the controller shall be obliged to erase the personal data without undue delay if one of the following grounds is met:
 - a) the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
 - b) the data subject withdraws the consent on the basis of which the processing is carried out pursuant to Article 6(1)(a) of the Regulation or Article 9(2)(a) of the Regulation and where there is no other legal basis for the processing;
 - c) the data subject objects to processing pursuant to Article 21(1) and no legitimate grounds for processing prevail or the data subject objects to processing pursuant to Article 21(2) of the Regulation;
 - d) the personal data has been unlawfully processed;
 - e) the personal data must be erased in order to comply with a legal obligation under European Union law or the law of a Member State to which the Controller is subject;

- f) the personal data was collected in connection with the offer of information society services pursuant to Article 8(1) of the Regulation.
2. Where a Controller has disclosed personal data and is required to erase the personal data pursuant to paragraph 1, the Controller shall, taking into account the technology available and the cost of implementing the measures, take reasonable measures, including technical measures, to inform controllers processing the personal data that the data subject has requested them to erase all references to that personal data, or a copy or replica of it.
3. Paragraphs 1 and 2 shall not apply where the processing is necessary:
 - a) to exercise the right to freedom of speech and information;
 - b) to comply with a legal obligation which requires processing under European Union law or the law of a Member State to which the Controller is subject, or to carry out a task carried out in the public interest or in the exercise of official authority vested in the Controller;
 - c) for reasons of public interest in the field of public health in accordance with Article 9(2)(h) and (i) of the Regulation as well as Article 9(3) of the Regulation;
 - d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes as referred to in Article 89(1) of the Regulation, where the right referred to in paragraph 1 is likely to make it impossible or seriously impede the achievement of the purposes of such processing; or
 - e) to prove, exercise or defend legal claims.

Right to restriction of processing

1. The data subject has the right to have the Controller restrict processing in one of the following cases:
 - a) the data subject contests the accuracy of the personal data during a period allowing the Controller to verify the accuracy of the personal data;
 - b) the processing is unlawful and the data subject objects to the erasure of the personal data and requests instead the restriction of its use;
 - c) the Controller no longer needs the personal data for the purposes of the processing but the data subject needs them to establish, exercise or defend legal claims;
 - d) the data subject has objected to processing pursuant to Article 21(1) of the Regulation, pending verification that the legitimate grounds on the part of the Controller outweigh the legitimate grounds of the data subject.
2. If processing has been restricted pursuant to paragraph 1, such personal data shall, with the exception of storage, be processed only with the consent of the data subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the European Union or of a Member State.
3. The Controller shall inform the data subject who has obtained the restriction of processing pursuant to paragraph 1 before the restriction of processing is lifted.

Right of portability

1. The data subject has the right to obtain personal data concerning him/her which he or she has provided to the Controller in a structured, commonly used and machine-readable format and has the right to

transmit this data to another Controller, without being prevented by the Controller to whom the personal data has been provided, if:

- a) the processing is based on consent pursuant to Article 6(1)(a) of the Regulation or Article 9(2)(a) of the Regulation or on a contract pursuant to Article 6(1)(b) of the Regulation, and
 - b) if the processing is carried out by automated means.
2. When exercising his/her right to data portability pursuant to paragraph 1, the data subject has the right to have the personal data transmitted directly from one Controller to another Controller, insofar as this is technically feasible.
 3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17 of the Regulation. That right shall not apply to the processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller.
 4. The right referred to in paragraph 1 may not have adverse effects on the rights and freedoms of others.

Right to object

1. The data subject has the right to object at any time, on grounds relating to his/her particular situation, to the processing of personal data concerning him/her which is carried out on the basis of Article 6(1)(e) or (f) of the Regulation, including objections to profiling based on those provisions. The Controller shall not further process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.
2. If personal data is processed for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning him/her for the purposes of such marketing, including profiling to the extent that it is related to such direct marketing.
3. If the data subject objects to processing for direct marketing purposes, the personal data may no longer be processed for such purposes.
4. The right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject at the latest at the time of the first communication with him/her, and shall be presented clearly and separately from any other information.
5. In the context of the use of the services of the information society and regardless of Directive 2002/58/EC, the data subject may exercise his/her right to object by automated means using technical specifications.
6. If the personal data is processed for scientific or historical research purposes or for statistical purposes pursuant to Article 89(1) of the Regulation, the data subject shall have the right to object, on grounds relating to his/her particular situation, to the processing of personal data concerning him/her, except where the processing is necessary for the performance of a task carried out for reasons of public interest.

Notification to third parties

The Controller shall notify each recipient to whom the personal data has been disclosed of any rectification or erasure of personal data or restriction of processing carried out pursuant to Article 16, Article 17(1) and Article 18 of the Regulation, unless this proves impossible or involves disproportionate effort. The Controller shall inform the data subject of those recipients if the data subject so requests.

Initiation of proceedings at the request of the data subject

The data subject, pursuant to Section 100 of Act 18/2018 Coll., has the right to file a petition for initiation of proceedings in the event that he/she is directly affected by his/her rights provided for in this Act. The Office shall consider the complaint within 30 days from the date of receipt of the complaint. The Authority shall inform the applicant of the manner of handling the complaint within 30 days of receipt of the complaint.