



**Personal Data Protection Policy**  
**RAJO a.s.**

# 1 Introductory provisions

The company **RAJO a.s.**, with registered seat at Studená 35, 823 55 Bratislava, Company ID: 31 329 519, recorded in the Commercial Register of District Court Bratislava I, division: Sa, file number: 459/B (hereinafter only "**RAJO**" or the "**Controller**") is one of the largest Slovak producers of dairy products. RAJO deals especially in the production of Slovak dairy products. It buys and processes milk, produces and distributes dairy products, frozen creams and fruit juices. It is also engaged in the production of vegetable fat products, foodstuffs and various other food products.

In the course of carrying out its business activities in line with the relevant valid legislation, RAJO, as the Controller, processes various types of personal data of data subjects for various but exactly specified purposes. Since the protection of natural persons in connection with the processing of their personal data is a fundamental right, RAJO, as the Controller, aims to protect such personal data that it processes in line with the General Data Protection Regulation – 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 repealing Directive 95/46/EC (the General Data Protection Regulation) and Act No. 18/2018 Coll. on Personal Data Protection and on changes and supplements to certain acts.

In order to fulfil its information obligation in relation to this purpose of the processing personal data as well as to disclose to data subjects additional facts on the processing of their personal data by the Controller, RAJO issues this document describing its personal data protection policy (hereinafter also as the "**Privacy Policy**"). RAJO shall transparently publish its **Privacy Policy** on its Web page so that data subjects have easy and permanent access to it.

For easier orientation in Privacy Policy, we present to the interested parties following structured overview of this document:

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### 3 Basic definitions

The terms and abbreviations used in the text of this document (Privacy Policy) have the meaning assigned to them below:

- The **General Data Protection Regulation (GDPR)** is 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 repealing Directive 95/46/EC;
- **The Personal Data Protection Act** is Act No. 18/2018 Coll. on the Protection of Personal Data and on changes and supplements to certain acts;
- **Personal data protection legislation** includes the GDPR Regulation and the Personal Data Protection Act;
- **Food Defence Legislation** is a summary of generally binding legal provisions governing measures to safeguard foodstuffs against deliberate degradation by biological, chemical, physical or radiological substances, consisting mainly of Regulation (EC) no. Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety and other related rules;

- **RAJO** is the commercial company RAJO a.s., with its registered seat at Studená 35, 823 55 Bratislava, Company ID: 31 329 519, recorded in the Commercial Register of District Court Bratislava I, Section: Sa, File Number: 459/B;
- **Personal data** are any information relating to an identified or identifiable natural person (hereinafter the “**data subject**”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **The Controller** is the natural person or legal entity, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the Controller or the specific criteria for its nomination may be provided for by Union or Member State law. For the purpose of this Privacy Policy RAJO shall be considered as the Controller, if it processes personal data in the sense of the preceding sentence;
- **The processor** is the natural person or legal entity, public authority, agency or other body which processes personal data on behalf of the Controller;
- **The recipient** is a natural person or legal entity, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients (*i.e. public authorities, to which personal data are provided in line with a legal obligation for performing their official role, for example, tax and customs authorities, financial news units, independent administrative authorities or financial markets authorities responsible for regulation and supervision of securities markets, are not considered as recipients, if in line with the law of the Union or a Member State they receive personal data which are essential for the performing of a certain finding in the general interest. The mentioned is relevant in relation to the provision of regular information of the data subject on a final list of recipients stated below in the Privacy Policy.*);
- **Processing** is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storing, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **Restriction of processing** is the labelling of stored personal data with the aim of limiting their processing in the future;
- **Profiling** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;
- **Pseudonymisation** means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;
- A **filing system** is any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis;
- **Consent** of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

- A **personal data breach** is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- A **third country** is a country which is not a Member State of the European Union or a Contracting Party to the Agreement on the European Economic Area;
- A **supervisory authority** means an independent public authority which is established by a Member State pursuant to Article 51 of the GDPR Regulation; in the Slovak Republic the supervisory authority is the Office for Personal Data Protection of the Slovak Republic.

## 4 Security of processing

In the interest of protecting the rights and freedoms of natural persons in the processing of personal data, the Controller has taken suitable technical and organisational measures to ensure that the requirements of Personal Data Protection legislation are fulfilled. The Controller considers the security of the processing of personal data as a priority and expends continuous efforts to prevent security incidents that could lead to risks to the rights and freedoms of individuals. The security of processing is regularly evaluated with respect to the latest knowledge and nature of the processing of personal data.

With reference to the above stated, we would like to emphasise that all personal data we obtain from the data subjects are processed with a high level of organisational and technological security. The Controller shall regularly review and, where possible, apply adequate safeguards for the security of personal data, which may include encryption or pseudonymisation.

Compliance of the Controller's processing of personal data with the GDPR Regulation, as well as with other European Union legislation, the Personal Data Protection Act and the Controller's rules, shall be monitored by the relevant persons charged by the Controller with the supervision of personal data protection. The contact data of the Controller are as follows: e-mail: ochrana\_osobnych\_udajov@rajo.sk, telephone contact: 02/49 225 200, address for service of documents: RAJO a.s., Studená 35, 823 55 Bratislava (please write "GDPR" on the envelope).

## 5 Principles of processing

The Controller thoroughly respects the principles of processing of personal data of data subjects and of privacy and pays heed to the fact that personal data must be in particular:

- a) processed lawfully, fairly and in a transparent manner;
- b) collected for specified, explicit and legitimate purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date;
- e) stored in a form which enables identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- f) processed in a manner that ensures adequate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The Controller obtains the processed personal data directly from the data subject. Personal data that the Controller did not obtain from the data subject, it obtained from a person other than the data subject (e.g. a family member, job broker, business partner) or from publicly accessible sources and information (such as a Land Registry Portal, the Commercial Register of the Slovak Republic).

In the course of its business activities, the Controller cooperates with several processors which in the performance of their activities pursuant to the respective contract process personal data on behalf of the Controller. The Controller shall only use processors who have declared that they have taken suitable technical and organisational measures to ensure that the processing satisfies the requirements of the Data Protection Legislation and to ensure that the rights of the data subject are protected. Processing by a processor is governed by a separate contract, which commits the processor to the Controller and contains the particulars within the meaning of the GDPR Regulation.

In the case of a personal data breach that is likely to lead to a high risk to the rights and freedoms of natural persons, the Controller shall report the data breach without undue delay to the data subject, if any of the conditions for waiving notification are not met.

## **6 Purposes of processing personal data by the Controller and the legal basis of processing**

It is in the Controller's interest to process the personal data of the data subjects only for a specific and current purpose. The Controller primarily processes personal data because it is necessary to meet its legal obligation as a Controller or to fulfil a contract to which the data subject is a party. The Controller also processes certain personal data of data subjects because such processing is necessary for the legitimate interests it pursues as a Controller. The consent of a data subject to the processing of personal data is required by the Controller in appropriate cases, if the nature of the processing requires it. The Controller is not currently performing automated decision-making, including the profiling referred to in Article 22 par. 1 and 4 of the GDPR, unless otherwise specifically stated below.

The Controller processes personal data for the purposes described below and on the legal bases presented below:

### **6.1 The information system of personal data „Employees – personal and wage agenda“**

The purpose of processing personal data is to conclude and fulfil an employment contract or work agreement made outside of employment or other bilateral legal acts associated with the regulation of labour rights and obligations and their registration; fulfilment of legal obligations related to employment or some similar relationship, which consists mainly of the following activities: ensuring the management of the personnel and wage agenda of employees in an employment relationship, processing the necessary statistical reports, making wage deductions for the state and other entities according to special provisions, preparing documents needed for wage budgeting, wage payments and payment of levies, recording and assessing employee attendance, posted employees records, copying documents needed for employment or similar relationships, records of authorisations and empowerments issued, records on education, records of damage to the employer's property caused by employees, provision of employee meals, fulfilment of obligations towards authorities of state administration; as well as providing domestic and foreign business trips for employees (e.g. providing billing, accommodation, insurance, air tickets, visas), providing employee benefits, planning job positions and fulfilling other statutory, contractual or other obligations of a Controller related to employment.

The legal basis for the processing is the fulfilment of an employment contract or one of the work agreements made outside of an employment relationship pursuant to Act No. 311/2001 Coll. the Labour Code, as amended (hereinafter referred to as the "**Labour Code**") and the fulfilment of the Controller's legal obligations, in particular pursuant to the following special regulations, which stipulate the employer's obligations towards the employee:

- The Labour Code,

- Act No. 580/2004 Coll. on Health Insurance and on changes and supplements of Act No. 95/2002 Coll. on Insurance and on changes and supplements to certain acts, as amended,
- Act No. 461/2003 Coll. on Social Insurance, as amended,
- Act No. 595/2003 Coll. on Income Tax, as amended,
- Act No. 43/2004 Coll. on Old Age Pension Savings, as amended,
- Act No. 650/2004 Coll. on Supplemental Pension Savings and on changes and supplements to certain acts, as amended,
- Act No. 5/2004 Coll. on Employment Services and on changes and supplements to certain acts, as amended,
- Act No. 462/2003 Coll. on Payment of Wages for Temporary Work Disability of an Employee and on changes and supplements to certain acts, as amended,
- Act No. 152/1994 Coll. on the Social Fund and on changes and supplements of Act No. 286/1992 Coll. on Income Tax, as amended,
- Act No. 355/2007 Coll. on the Protection, Support and Development of Public Health and on changes and supplements to certain acts, as amended,
- Act No. 125/2006 Coll. on Labour Inspection, as amended,
- Act No. 82/2005 Coll. on Illegal Work and Illegal Employment and on changes and supplements to certain acts
- Act No. 233/1995 Coll. on Judicial Executors and Execution Proceedings (Execution Order) and on changes and supplements to certain acts, as amended,
- Act No. 8/2008 Coll. on Insurance and on changes and supplements to certain acts, as amended,
- Act No. 283/2002 Coll. on Travel Reimbursements, as amended,
- Act No. 18/2018 Coll. on Personal Data Protection and on changes and supplements to certain acts.

The provision of personal data of a data subject is a legal or contractual requirement and in the case of their non-provision the Controller may not fulfil its statutory obligations arising from the relevant labour law and related legislation, or no employment relationship arises between the employee and the employer. Consent with the processing of personal data is not required.

For the purpose of securing foreign business trips for its employees, the Controller may transfer an employee's personal data to a Third Country, and such transfer shall be made only in connection with the performance of the employee's job for the Controller. The transfer of personal data to a Third Country can only be made with reference to the existing decisions of the European Commission that the Third Country in question guarantees an adequate level of protection, alternatively after the relevant conditions under the GDPR Regulation are met.

The personal data of a data subject may be provided to the extent necessary mainly to the following recipients: social insurance, health insurers, financial administration authorities, supplementary pension savings, pension management companies, Offices of Labour, Social Affairs and Family, executors, courts and law enforcement authorities, subjects providing statistics, banks, educational agencies and trainers, attorneys providing legal services to the Controller, external tax and accounting advisors, external auditors, subjects providing postal services, subjects providing development, administration and support of information technologies, telecommunications service providers, providers of catering services, the company that administers the servers on which personal data are stored, entities providing payroll processing for the employer, customers of the employer, suppliers of the employer.

The Controller shall be entitled to provide or disclose personal data of employees in the range of title, name, surname, work facility, service facility, functional facility, personal number of the employee or an employee number, department, place of work, telephone number, fax number, workplace e-mail address and employer identification data, if it is necessary in connection with the performance of work, services or functional duties of the employee as a data subject. The

provision of personal data or disclosure of personal data shall not impair the seriousness, dignity and security of the data subject.

## **6.2 The information system of personal data „Occupational Safety and Health“**

The purpose of the processing of personal data is the fulfilment of the Controller's legal obligations related to occupational safety and health, including records on training, accidents at work and medical examinations.

The legal basis of processing is the fulfilment of the Controller's legal obligations pursuant to Act No. 124/2006 Coll. on Occupational Safety and Health and on changes and supplements to certain acts, as amended. Consent with the processing of personal data is not required. The provision of personal data of a data subject is a legal requirement and in the case of non-provision, the Controller cannot meet its legal obligations arising from the relevant legislation in the field of occupational safety and health.

The personal data of the data subject may be provided in particular to the following recipients: social insurance, health insurers, Offices of Labour, Social Affairs and Family, occupational health services, occupational health assessments and health assessment, education agencies and trainers, subjects providing statistics, subjects providing development, administration and support of information technologies, external auditors, the company that administers servers on which personal data are stored, attorneys providing the Controller with legal services, executors, court, law enforcement authorities.

The Controller has no intention of transferring the personal data of the data subjects to a Third Country or an international organisation.

## **6.3 The information system of personal data „Monitoring of employees pursuant to the Labour Code“**

The purpose of the processing the personal data is to monitor RAJO employees to ensure that employees perform their duties as employees and observe work discipline, including supervision of compliance with occupational safety and health, controlling the effective use of working time by RAJO employees, checking compliance with Food Defence legislation, all with reference to the specific nature of RAJO's activities, whereby the processing according this paragraph is carried out in the form of video surveillance by CCTV and software applications used (such as FortiNet, Eset, Lotus, etc.). On the basis of monitoring, RAJO obtains information about the data subject's movement, including images of his or her face, the use of applications, websites, connected devices, e-mails, printing, networking, file operations, and the overall status of the workstations used by employees.

The legal basis of the processing is the provisions of § 13 par. 4 of the Labour Code and Food Defence Legislation following Article 6 par. 1, lett. c) of the GDPR Regulation. The data subject is obliged to be subjected to transparent monitoring of which he/she is duly informed and also to provide his/her personal data, otherwise he/she may violate work discipline, because this will prevent the purpose of transparent monitoring.

The data subject's personal data may be provided, in particular, to the following recipients: courts, law enforcement authorities, subjects providing IT administration and support, attorneys providing legal services to RAJO.

RAJO has no intention of transferring the personal data of data subjects to a Third Country or an international organisation.

## **6.4 The information system of personal data „Database of job applicants“**

The purpose of processing personal data is:

- maintaining a database of jobseekers who voluntarily sent their CV, application letter, application for employment, or other similar documentation to the Controller, without responding to a specific selection procedure, or a published ad promoting vacancies. The Controller shall keep CVs, cover letters, job applications or other similar documentation in the created database of job seekers for the period of the consent given by the data subject and, if necessary, fill vacancies with selected applicants from the database. The legal basis of the processing shall be the data subject's free consent to the processing of personal data, which the data subject may withdraw at any time. The provision of personal data is voluntary and the Controller will not penalize for their non-provision in any way;
- maintaining a database of job seekers who have shown an interest in a specific job offered by the Controller. Consent with the processing of personal data is not required. The data subject is obliged to provide his/her personal data, because this is necessary for performing pre-contractual measures at the request of the data subject; otherwise, the data subject is prevented from participating in the selection procedure. If the data subject has expressed an interest in a specific job, but no employment relationship has been established and the data subject has subsequently not consented to the processing of personal data for further recording in the database of job seekers maintained by the Controller, his/her personal data will be deleted

The personal data of the data subject may be provided mainly to the following recipients: courts, law enforcement authorities, attorneys providing legal services to the Controller.

The Controller has no intention of transferring the personal data of data subjects to a Third Country or an international organisation.

#### **6.5 The information system of personal data „Company bodies“**

The purpose of processing personal data is to maintain the agenda of the members of the Controller's bodies, which are the Controller's Board of Directors, the General Meeting, the Controller's Supervisory Board as well as the agenda of the Controller's proxy.

The legal basis of the processing is the fulfilment of a contract to which the data subject is a party, as well as the fulfilment of a legal obligation under Act No. 513/1991 Coll. Commercial Code, as amended, or other related legislation. Consent with the processing of personal data is not required.

The provision of personal data of a data subject is a legal or contractual requirement, and in the case of their non-provision the Controller may not fulfil its statutory obligations arising from the relevant legislation or no employment relationship shall arise between the employee and the employer.

The personal data of the data subject may be provided mainly to the following recipients: the Commercial Register of the Slovak Republic, attorneys providing legal services to the Controller, auditors, external tax and accounting consultants, and, to the extent necessary, contractual partners.

The Controller has no intention of transferring the personal data of data subjects to a Third Country or an international organisation.

#### **6.6 The information system of personal data „Records of delivered and sent postal mail“**

The purpose of processing personal data is to keep records of delivered and sent mail. The legal basis of such processing is the fulfilment of a legal obligation under Act No. 395/2002 Coll. on Archives and Registries and on amendments to certain acts, as amended or other associated legislation. Consent with the processing of personal data is not required. The provision of personal data of the data subject is a legal requirement and in case of their non-provision the Controller may not fulfil its legal obligations arising from the relevant legislation. The personal

data of the data subject may be provided mainly to the following recipients: if necessary, attorneys providing legal services to the Controller, auditors, companies providing archiving services and registry administration, external tax and accounting advisors.

The Controller has no intention of transferring the personal data of data subjects to a Third Country or an international organisation.

#### **6.7 The information system of personal data „Accounting documents“**

The purpose of processing personal data is the processing of accounting documents, i.e. the processing of accounting data and financial reporting, the provision of accounting information, methodologies and standards in the field of accounting and taxation, including bookkeeping of journeys of motor vehicles and fuel consumption management of motor vehicles.

The legal basis of such processing is the fulfilment of a legal obligation under Act No. 431/2002 Coll. on Accounting, as amended, Act No. 595/2003 Coll. on Income Tax as amended, Act No. 563/2009 Coll. on Tax Administration (Tax Code) as amended, or other related legislation. Consent to the processing of personal data is not required. The provision of personal data of a data subject is a legal requirement, and in the case of their non-provision the Controller may not fulfil its statutory obligations arising from the relevant legislation.

The personal data of the data subject may be provided mainly to the following recipients: if necessary, attorneys providing legal services to RAJO, auditors, external tax and accounting consultants.

The Controller has no intention of transferring the personal data of data subjects to a Third Country or an international organisation.

#### **6.8 The information system of personal data „Contractual relations“**

The purpose of the processing of personal data is the concluding and fulfilment of the subject matter of a contract to which the data subject and the Controller are parties (e.g. purchasing contracts, work contracts, etc.), including the implementation of pre-contractual arrangements, such as keeping records of clients, customers, members of company bodies, employees and other workers of suppliers and customers or persons entrusted or empowered by them or other business subjects, with the aim of conducting effective communication with the other party or ensuring proper fulfilment of the obligation, alternatively of asserting RAJO's claims.

The legal basis of the processing is the fulfilment of a contract to which the data subject is a party, fulfilment of legal obligation pursuant to Act No. 513/1991 Coll. Commercial Code, as amended, Act No. 40/1964 Coll. Civil Code, as amended, Act No. 162/1995 Coll. on the Land Register and on the Registration of Ownership and Other Rights to Real Estate (Cadastral Act), as amended, or other relevant legislation, as well as the legitimate interests of RAJO as the Controller, by which it pursues effective communication with the other party or the proper fulfilment of the obligation, alternatively the assertion of RAJO's claims. Consent to the processing of personal data is not required, except if a specific category of personal data is processed with the explicit consent of the data subject under Article 9 par. 2 lett. a) of the GDPR Regulations. The provision of personal data of a data subject is a legal or contractual requirement, and in the case of their non-provision the Controller may not fulfil its statutory obligations arising from the relevant legislation or no employment relationship shall arise between the employee and the employer. The data subject is obligated to provide his/her personal data, or within the meaning of provisions of § 78 par. 3 of the Personal Data Protection Act to withhold the disclosure of his/her personal data, whereas, in the case of non-provision of personal data, the Controller is unable to communicate effectively with the other party or ensure proper fulfilment of the obligation, alternatively application of the claims of RAJO.

The personal data of the data subject may be provided mainly to the following recipients: authorities of financial administration, law enforcement agencies, courts, executors, attorneys providing legal services to RAJO, auditors, external tax and accounting consultants. The Controller has no intention of transferring the personal data of data subjects to a Third Country or an international organisation.

#### **6.9 The information system of personal data „Complaints“**

The purpose of processing personal data is to keep records of existing complaint processes in the range necessary for recording and handling individual complaint proceedings in compliance with the Controller's complaints procedure and applicable legal regulations.

The legal basis of the processing is the fulfilment of the legal obligation, in particular in line with Act No. 40/1964 Coll. Civil Code and Act No. 250/2007 Coll. on Consumer Protection and on an amendment to Act No. 372/1990 Coll. on Offenses, as amended, or other related legislation. Consent to the processing of personal data is not required. The provision of personal data of a data subject is a legal requirement, and in the case of their non-provision the Controller may not fulfil its statutory obligations arising from the relevant legislation.

The personal data of the data subject may be provided mainly to the following recipients: courts, attorneys providing legal services to RAJO, auditors, external tax and accounting consultants. The Controller has no intention of transferring the personal data of data subjects to a Third Country or an international organisation.

#### **6.10 The information system of personal data „Legal agenda“**

The purpose of the processing of personal data is to keep records and handle a legal dispute and non-dispute agenda, including litigation and other legal proceedings, which the Controller monitors especially in demonstrating, exercising or defending its legal claims.

The legal basis of the processing is the legitimate interests of RAJO as the Controller, by which it monitors the demonstrating, asserting or defending of its legal claims. Consent to the processing of personal data is not required.

The personal data of the data subject may be provided mainly to the following recipients: law enforcement authorities, courts, attorneys providing legal services to RAJO, executors, auditors. The Controller has no intention of transferring the personal data of data subjects to a Third Country or an international organisation.

#### **6.11 The information system of personal data „Registries administration“**

The purpose of processing personal data is for properly maintaining and managing a registry. The legal basis of processing is the fulfilment of a legal obligation under Act No. 395/2002 Coll. on Archives and Registries and on amendments to certain acts, as amended or other related legislation. Consent to the processing of personal data is not required. The provision of personal data of a data subject is a legal requirement, and in the case of their non-provision the Controller may not fulfil its statutory obligations arising from the relevant legislation.

The personal data of the data subject may be provided mainly to the following recipients: Ministry of Interior of the Slovak Republic and other state administration authorities in the field of archives and registries, courts and law enforcement authorities, attorneys providing legal services to RAJO, companies providing archive services and registry administration.

The Controller has no intention of transferring the personal data of data subjects to a Third Country or an international organisation.

#### **6.12 The information system of personal data „Video monitoring of the premises of RAJO, a.s.“**

The purpose of the processing of personal data is the visual monitoring of RAJO's grounds and premises using a camera system in order to protect RAJO's assets and those of third parties, protect the health of persons located in the monitored areas, protect RAJO's financial interests, strengthen RAJO position regarding the prevention of possible leakage of classified information, protecting other rights and legally protected interests of RAJO or a third party and preventing damage as well as ensuring the protection of public order and safety.

The legal basis for processing is the legitimate interest of RAJO as a Controller within the meaning of Article 6 par. 1 lett. f) of the GDPR Regulation, by which it primarily monitors the safety of its employees and other persons present at RAJO's premises, as well as the protection of its property and that of third parties. The data subject is obligated to be subjected to transparent visual monitoring, of which he/she is duly informed, and thus to provide his/her personal data; otherwise, he/she will not be allowed access to RAJO's premises in a controlled manner.

The personal data of the data subject may be provided mainly to the following recipients: members of private security services providing guard services for RAJO, courts, law enforcement authorities, subjects providing IT administration and support related to the operation of the CCTV systems concerned, attorneys providing legal services to RAJO.

The Controller has no intention of transferring the personal data of data subjects to a Third Country or an international organisation.

#### **6.13 The information system of personal data „Collective bargaining“**

The purpose of the processing of personal data is to keep a register of employee representatives who are authorised to participate in collective bargaining in line with the applicable legislation.

The legal basis of processing is the fulfilment of a legal obligation under the Labour Code, Act No. 2/1991 Coll. on Collective Bargaining, as amended, or other related legislation. The provision of personal data of a data subject is a legal requirement, and in the case of their non-provision RAJO may not fulfil its statutory obligations arising from the relevant legislation.

The personal data of the data subject may be provided mainly to the following recipients: attorneys providing legal services to RAJO.

RAJO has no intention of transferring the personal data of data subjects to a Third Country or an international organisation.

#### **6.14 The information system of personal data „Reporting of antisocial activities“**

The purpose of processing personal data is to handle complaints delivered to RAJO in connection with the reporting of anti-social activities and to keep records of such complaints.

The legal basis of processing is the fulfilment of a legal obligation under Act No. 54/2019 Coll. on the Protection of Whistle-blowers of Anti-social Activities, and on changes and supplements to certain acts, as amended.

The provision of personal data of a data subject is a legal requirement, and in the case of their non-provision RAJO may not fulfil its statutory obligations arising from the relevant legislation.

The personal data of the data subject may be provided in particular to the following recipients: Ministry of Justice of the Slovak Republic, attorneys providing legal services to RAJO, courts, law enforcement authorities.

RAJO has no intention of transferring the personal data of data subjects to a Third Country or an international organisation.

#### **6.15 The information system of personal data „Handling requests of data subjects“**

The purpose of the processing of personal data is to handle requests from data subjects addressed to RAJO pursuant to Article 12 et seq. of the GDPR Regulations.

The legal basis for processing is compliance with a legal obligation pursuant to Articles 12 through 22 of the GDPR Regulations and Articles 33 and 34 of the GDPR Regulations.

The provision of personal data of a data subject is a legal requirement, and in the case of their non-provision RAJO may not fulfil its statutory obligations arising from the GDPR Regulation and satisfy the request of the data subject.

The personal data of a data subject may be provided to the extent necessary, in particular, to the following recipients: a controller, a processor, courts and law enforcement authorities, attorneys providing legal services to RAJO.

RAJO has no intention of transferring the personal data of data subjects to a Third Country or an international organisation.

#### **6.16 The information system of personal data „Electronic mailbox“**

The purpose of the processing of personal data is to ensure proper electronic communication of RAJO with public authorities regarding the implementation of their competencies in electronic form.

The legal basis of processing is the fulfilment of a legal obligation under Act No. 305/2013 Coll. on the Electronic Form of Exercising the Powers of Public Authorities and on changes and supplements to certain acts (the e-Government Act), as amended.

The provision of personal data of a data subject is a legal requirement, and in the case of their non-provision RAJO may not fulfil its statutory obligations arising from the relevant legislation.

The personal data of the data subject may be provided mainly to the following recipients: the National Agency for Network and Electronic Services (NASES), subjects providing IT administration and support, attorneys providing legal services to RAJO.

RAJO has no intention of transferring the personal data of data subjects to a Third Country or an international organisation.

#### **6.17 The information system of personal data „Marketing“**

The purpose of processing personal data is to ensure the conduct of marketing, such as, for example, informing about new items, discounts and other marketing offers. The purpose of personal data processing is also distribution of advertising materials and marketing research surveys by RAJO as the Controller.

The legal basis of the processing is the data subject's free consent to the processing of personal data, which the data subject may withdraw at any time. The provision of personal data is voluntary and their non-disclosure will not be penalized in any way by RAJO, or if a data subject does not provide his/her personal data; otherwise RAJO is unable to conduct its marketing activities.

The personal data of the data subject may be provided mainly to the following recipients: RAJO contractors providing marketing activities, courts, law enforcement authorities, executors, attorneys providing legal services to RAJO.

RAJO has no intention of transferring the personal data of data subjects to a Third Country or an international organisation.

#### **6.18 The information system of personal data „Consumer competition“**

The purpose of the processing of personal data is to ensure the participation of the data subjects in the relevant consumer competition organised by RAJO and to ensure the proper conduct of

this consumer competition (which consists in but is not limited to ensuring the drawing of winners, evaluation of the course of the competition, verifying winners, announcing of results of a consumer competition and delivery of the winnings, all in accordance with the relevant terms and conditions and rules governing the scope and manner of disclosure of personal data of the data subjects).

The legal basis of the processing is the data subject's free consent to the processing of personal data, which the data subject may withdraw at any time. The provision of personal data is voluntary and their non-disclosure will not be penalized in any way by RAJO, or if the data subject does not provide his or her personal data, the data subject cannot properly take part in the consumer competition organised by RAJO.

The personal data of the data subject may be provided mainly to the following recipients: RAJO contractors providing a consumer competition, courts, law enforcement authorities, executors, attorneys providing legal services to RAJO.

RAJO has no intention of transferring the personal data of data subjects to a Third Country or an international organisation.

#### **6.19 The information system of personal data „Visits“**

The purpose of the processing of personal data is the identification of a natural person at a one-time access to the RAJO premises.

The legal basis of the processing is the legitimate interest of RAJO as the Controller, by which it monitors the safety of its employees and the protection of its assets. The data subject is obligated to provide his/her personal data; otherwise he/she will not be allowed controlled access to the RAJO premises.

The personal data of the data subject may be provided mainly to the following recipients: members of the private security service protecting RAJO's property.

RAJO has no intention of transferring the personal data of data subjects to a Third Country or an international organisation.

#### **6.20 The information system of personal data „Managing the administration of access to user contacts for information system and applications“**

The purpose of processing personal data is to ensure the administration of user accounts, as well as proper and effective communication between the supplier of the information system or application and RAJO as the customer.

The legal basis of the processing is the legitimate interest of RAJO as the Controller, by which it monitors the proper and full use of the information systems and applications supplied. The data subject is obligated to provide his/her personal data; otherwise RAJO cannot support information systems and applications and resolve possible faults in them.

The personal data of the data subject may be provided mainly to the following recipients: subjects that supply information systems and applications to RAJO based on contracts concluded contractual with them (a current list of suppliers can be found in the ICT section of RAJO).

RAJO has no intention of transferring the personal data of data subjects to a Third Country or an international organisation.

#### **6.21 The information system of personal data „Infoservice“**

The purpose of the processing of personal data is to handle demands and questions from data subjects addressed to RAJO.

The legal basis of the processing is the data subject's free consent to the processing of personal data, which the data subject may at any time withdraw or refuse or the fulfilment a contract to

which the data subject is a party. The provision of personal data is voluntary and their non-provision will not be penalized in any way by RAJO, or if the legal basis is the fulfilment of a contract, the data subject is obligated to provide his or her personal data; otherwise the demand cannot be properly addressed.

The personal data of the data subject are not provided to any recipients.

RAJO has no intention of transferring the personal data of data subjects to a Third Country or an international organisation.

## **6.22 The information system of personal data „Photographs of data subjects“**

The purpose of processing photos of data subjects as a common category of personal data is to take and publish photos of data subjects, in particular from corporate events, training sessions, seminars and other RAJO events and the transparent promotion of RAJO with them and support of better internal and external communication, whereby photographs can be placed on the organisational structure and on the boards of RAJO as well as on the Intranet, in RAJO publications and magazines, on social networks and on the RAJO website (or in other media used by RAJO).

The legal basis for the processing is the data subject's free consent to the processing of personal data, which the data subject may revoke at any time, alternatively the legitimate interest of RAJO as a Controller, by which it pursues transparent promotion of RAJO and support of better internal and external communication.

If personal data are processed with the consent of the data subject, the provision of personal data is voluntary and their non-provision will not be penalized in any way by RAJO. If personal data are processed on the basis of a legitimate interest of RAJO, the data subject is obligated to tolerate the disclosure of his/her personal data; otherwise, RAJO cannot achieve the aforementioned objectives it pursues. RAJO processes personal data for the above-stated purposes, in order to not violate the data subject's right to the protection of his or her person or right to privacy and to respect the dignity of the data subject.

A data subject's personal data may be provided to the following recipients: RAJO customers, suppliers or other RAJO partners.

RAJO has no intention of transferring the personal data of data subjects to a Third Country or an international organisation.

## **6.23 Personal data information system “Prevention of the spread of dangerous contagious human diseases”**

The purpose of processing personal data is to take preventive measures with the aim of preventing or reducing the risk associated with the emergence or spread of dangerous contagious human diseases which have the range of an epidemic or pandemic (at the time of introducing this purpose of processing, this relates to COVID-19).

The legal foundation for the processing of ordinary personal data is (I.) fulfilment of the legal obligation of RAJO, particularly in line with the Labour Code and Act No. 124/2006 Coll. on Occupational Safety and Health and on changes and supplements to certain acts, as amended, or other related legislation (i.e. Article 6 par. 1 lett. (c) of the GDPR Regulation); or (II.) protection of the vital interests of the data subject or another natural person, which may include processing essential for humanitarian purposes, including the monitoring of epidemics and their spread (i.e. Article 6 par. 1 lett. (d) of the GDPR Regulation); or (III.) fulfilment of a task done in the public interest, such as disease control and other health threats (i.e. Article 6 par. 1 lett. (e) of the GDPR Regulation).

Sensitive data are processed on the basis of the following exceptions: (I.) the necessity to process them to fulfil the obligations and exercise the special rights of the controller or data subject in the field of labour law and social security and social protection law (i.e. Article 9 par.

2 lett. (b) of the GDPR Regulation); or (II.) the necessity to process them for reasons of public interest in the field of public health, such as protection against serious cross-border threats to health (i.e. Article 9 par. 2 lett. (i) of the GDPR Regulation); or (III.) the necessity to protect the vital interests of the data subject or of another natural person (Article 9 par. 2 lett. (c) of the GDPR Regulation).

The provision of personal data of the data subject is a legal requirement and in the case of non-provision, RAJO cannot fulfil its legal obligations following from the relevant legislation, cannot meet the needs of the public interest, or cannot protect the vital interests of individuals. Consent with the processing of personal data is therefore not required.

The personal data of the data subject may be provided to the following recipients: The Public Health Authority of the Slovak Republic (or regional public health authorities), hospitals, law enforcement authorities or attorneys providing legal services to RAJO.

RAJO has no intention to transfer the personal data of data subjects to a Third Country or an international organization.

## **7 Processed personal data**

The Controller processes only personal data that it absolutely needs to carry out its business activities, to fulfil its legal and contractual obligations and to protect its legitimate interests. The Controller shall make sure that it processes only such a range of personal data about a data subject needed for the purpose of the relevant processing. This principle of minimising processing also applies in relation to personal data which are provided to the Controller with the consent of the data subject. If the Controller monitors the location of data subjects, it shall inform the data subject accordingly.

## **8 Period of storing personal data**

The Controller shall store the personal data of data subjects for a different period of time, depending on the reason and purpose of the processing. In general, the Controller processes personal data:

- for the period required by the relevant generally binding legal provision, if it processes personal data for the purpose of fulfilling its legal obligations;
- for the duration of the contractual relationship established by the contract, or the duration of the pre-contractual relations, if it processes personal data for the purpose of fulfilling a contract;
- for the duration of the legitimate interest pursued by the Controller, if the processing of personal data is essential for this purpose;
- for the period explicitly stated in the consent or until its withdrawal, if it processes personal data on the basis of consent.

With the aim of ensuring that personal data are not stored longer than necessary, the Controller shall set time limits for the deletion or regular examining of personal data. Personal data may only be processed so long as the purpose of their processing continues. After this period, personal data shall be immediately deleted in accordance with the relevant internal regulations and documents of the Controller. A specific period of storage for individual data are specified in the relevant internal regulations and documents of the Controller. The data subject may at any time submit a request to the Controller to indicate how long his/her personal data will be stored.

Upon expiry of the relevant period referred to above, the Controller is authorised to process the personal data of the data subject only for compatible purposes or for special purposes, such as archiving or compiling statistics.

## **9 Use of cookies**

Cookies are small text files that improve the use of a website e.g. by enabling the recognition of previous visitors upon logging into the user environment, remembering the visitor's choice when opening a new window, measuring website traffic or how it is used to improve user experience. Our website uses cookies to assess its traffic. You can prevent these files from being stored on your device at any time by adjusting the settings in your web browser. Your browser settings, pursuant to § 55 par. 5 of Act No. 351/2011 Coll. on Electronic Communications, as amended, are considered to be your consent to the use of cookies on our site.

## **10 Rights of data subjects**

The Controller considers it important that each data subject has control over his/her personal data and that the personal data are lawfully processed. It is in the Controller's interest to permit data subjects to exercise their rights in relation to the protection of personal data as easily as possible. If a data subject wishes to exercise any of his/her rights, he/she may do so electronically at the Controller's e-mail address: [ochrana\\_osobnych\\_udajov@rajo.sk](mailto:ochrana_osobnych_udajov@rajo.sk), by telephone at: +421 249 225 200, by sending a written request to the Controller's address: Studená 35, 823 55 Bratislava-Ružinov, or also in person at the Controller's registered seat with a request to meet with the person in charge of handling the personal data protection agenda.

The data subject has the right to request from the Controller access to personal data concerning his or her person. The data subject shall have the right to rectify, erase or restrict the processing of personal data, as well as the right to object to the processing of personal data and the right to its portability. The data subject also has the right to withdraw consent to the processing of personal data and the right to lodge a complaint with the supervisory authority.

### **A) Right of access**

The data subject has the right to obtain from the Controller confirmation about whether or not personal data concerning his or her person are being processed and, if so, has the right to access to this personal data. The data subject also has the right to obtain a copy of processed personal data and additional information following from Art. 15 of the GDPR Regulation, such as, for example: purposes of processing, categories of the data subject's personal data, period of storage, period of keeping personal data, etc

### **B) Right of rectification**

It is in the interest of the Controller to processes about a data subject only current personal data, and therefore we ask data subjects to actively assert their right to completion of incomplete personal data and rectifying incorrect personal data.

### **C) Right to erasure**

The data subject has the right have the Controller erase personal data concerning him or her without undue delay, if some of the reasons in article 17 of the GDPR Regulation are met. The reason for the erasure may be, for example, if the data subject withdraws consent to the processing, if the personal data are no longer necessary for the purposes for which they were obtained or otherwise processed, or if the data subject objects to the processing and the like.

### **D) Right of restriction of processing**

The data subject has the right to have the Controller restrict the processing of personal data, if any of the cases referred to in Article 18 of the GDPR Regulation occur. For example, a limitation occurs if the data subject challenges the correctness of the personal data (and does so during a period enabling the Controller to verify the accuracy of the personal data), or if the processing is unlawful and the data subject objects to the erasure of personal data and asks to restrict their use instead.

**E) Right to data portability**

If the processing of personal data is carried out by automated means and the legal basis for the processing of personal data is the data subject's consent or performance of the contract, the data subject has the right to obtain personal data relating to him provided to the Controller in a structured, commonly used and machine-readable format and has the right to transfer this data to another controller. In the case of interest of the data subject and, if technically possible, the Controller shall transfer the relevant personal data directly to another Controller.

**F) Right to object and automated individual decision-making**

The data subject has the right at any time, for reasons relating to his particular situation, to object to the processing of personal data concerning him or her which is carried out for the legitimate interests pursued by the Controller, including objection to any subsequent profiling. The Controller may not further process personal data unless the Controller is able to demonstrate that the necessary legitimate grounds for processing outweigh the interests, rights and freedoms of the data subject, or grounds for establishing, asserting or defending legal claims.

A data subject has the right not to be subject to a decision of the Controller which is based exclusively on automated processing, including profiling, and which has legal effects which are related to or similarly affect him or her.

**G) Right to lodge a complaint**

If the data subject suspects that the Controller is processing personal data unlawfully, he/she is entitled to file a complaint to the Supervisory Authority. The Supervisory Authority for the territory of the Slovak Republic is the Office for Personal Data Protection of the Slovak Republic, registered office: Hraničná 12, 820 07 Bratislava, Slovak Republic, tel.: +421 (2) 3231 3214, web: [www.dataprotection.gov.sk](http://www.dataprotection.gov.sk), e-mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk).

**H) Right to withdraw consent**

In the case of processing personal data for which the consent of the data subject is required by the Data Protection Legislation, the Controller shall request the consent of the data subject with the processing of his/her personal data for the relevant purpose of processing, which is a clear expression of the will and the free, specific, informed and clear-cut statement of consent with such processing. If the data subject has given consent to the processing of his/her personal data for a specific purpose, he/she has the right to withdraw this consent at any time without prejudice to the lawfulness of the processing based on the consent granted prior to his/her withdrawal.

The Controller shall, without undue delay, provide the data subject with information on measures taken at the request of the data subject pursuant to this Article, no later than one month after receipt of the application. The stated period may be extended by an additional two months, if necessary. The Controller shall in every case inform the data subject of any such extension within one month of receipt of the application, together with the reasons for the failure to comply with the time limit. If the data subject submitted the request by electronic means, the information shall, as far as possible, be provided by electronic means, unless the data subject has requested otherwise.

If the Controller does not take measures at the request of the data subject, it shall, without delay and no later than within one month from receipt of the request, inform the data subject of the reasons for not taking action and the possibility of filing a complaint with the supervisory authority and applying a judicial remedy.

All measures taken pursuant to Articles 15 to 22 and Article 34 of the GDPR shall be provided free of charge.

## **11 Final provisions**

In case of any questions related to the protection of personal data, we ask data subjects to contact the Controller in the form that they find most suitable for them.

The Controller is authorised to change the Privacy Policy, especially for the purpose of incorporating legislative changes, updating the purposes and means of processing and the like. By changing this privacy policy, the Controller does not restrict the rights of the data subject under Personal Data Protection legislation. If the privacy policy is modified, the Controller shall inform data subjects accordingly.

The Privacy Policy acquires force on the day it is approved. Control of compliance with the Privacy Policy is verified by the head of the Human Resources Department. Any interference with the approved document is inadmissible. Any errors or deficiencies found or suggestions for changes to the document should be reported to the MK without delay.

The Privacy Policy is binding for all employees of RAJO. Non-observance of the principles given in the Privacy Policy shall be classified as a breach of work discipline.

In Bratislava, updated on 27<sup>th</sup> March 2020