

## Information Obligation

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Dear Employee, Business Partner, Client,

On May 25, 2018, new legislation concerning personal data protection came into effect. We would like to provide you with information about the processing of personal data based on Regulation (EU) 2016/679 of the European Parliament and Council on the protection of natural persons concerning the processing of personal data and on the free movement of such data (hereinafter referred to as "GDPR") and Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments and Supplements to Certain Acts.

### Controller:

Robotec, s.r.o., Hlavná 3, Sučany 038 52, IČO: 36 410 055

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The controller processes personal data for various purposes related to its activities. In most cases, the processing of personal data is necessary based on specific regulations or international treaties binding on the Slovak Republic.

The controller has appointed a Data Protection Officer (DPO). The responsibilities of the DPO under GDPR are carried out by the external consultancy company Top Privacy s.r.o. The DPO can be contacted at: veronikatohova@topprivacy.sk.

We would also like to inform you about how we handle your personal data, your rights, and the legal grounds for processing personal data. When reviewing this information, you may encounter terms that are defined as follows:

### Definition of Key Terms

- **Consent** – any freely given, specific, informed, and unambiguous indication of the data subject's wishes, by which the data subject, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to them.
- **Genetic Data** – personal data related to inherited or acquired genetic characteristics of a person, which provide unique information about the physiology or health of the individual and which are derived from the analysis of biological samples.
- **Biometric Data** – personal data resulting from specific technical processing of personal data concerning the physical, physiological, or behavioral characteristics of a person, which allow for unique identification or confirmation of the unique identification of the person, such as facial images or fingerprints.
- **Health Data** – personal data concerning the physical or mental health of a person, including information on the provision of health care or related services, which reveal information about the person's health status.
- **Processing of Personal Data** – any operation or set of operations performed on personal data or sets of personal data, such as collection, recording, organization, structuring, storage, alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment, combination, restriction, erasure, or destruction, regardless of whether or not carried out by automated means.

• **Profiling** – any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a person, particularly to analyze or predict aspects related to their performance at work, financial situation, health, personal preferences, interests, reliability, behavior, location, or movements.

• **Pseudonymization** – the processing of personal data in such a way that 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 organizational measures to ensure that the personal data cannot be attributed to an identified or identifiable individual.

• **Log** – a record of the user's activity within an automated information system.

• **Online Identifier** – an identifier provided by an application, tool, or protocol, such as IP address, cookies, login credentials for online services, or radio-frequency identification, which may leave traces that, especially when combined with unique identifiers or other information, may be used to create a profile of the data subject and identify them.

### **Purposes of Processing Personal Data**

For employees, the controller processes personal data in the following information systems:

1. Payroll and Personnel
2. Registry Management
3. Accounting Documents
4. Promotion
5. Camera System
6. Professional Practice
7. Attendance System

For business partners, the controller processes personal data in the following information systems:

1. Registry Management
2. Accounting Documents
3. Business Partner Records
4. Court Disputes

For clients, the controller processes personal data in the following information systems:

1. Camera System
2. Registry Management
3. Accounting Documents
4. Marketing
5. Cookies
6. Court Disputes

For job applicants, the controller processes personal data in the following information systems:

## 1. Job Applicant Records

For company executives, the controller processes personal data in the following information systems:

### 1. Final Beneficiaries

#### **Your Rights under GDPR**

The data subject has the right to access their data. Upon request, the controller will confirm whether personal data concerning the data subject is being processed. If so, the controller will provide a copy of the data upon request.

The data subject has the right to rectify personal data if incorrect data is held. The data subject also has the right to complete incomplete personal data.

The data subject has the right to erasure (right to be forgotten) of personal data, provided that:

- a) the data is no longer necessary for the purposes for which it was collected or otherwise processed;
- b) the data subject withdraws consent upon which the processing is based,
- c) the data subject objects to the processing of personal data,
- d) the data was processed unlawfully,
- e) the erasure is required to fulfill a legal obligation or an international treaty binding on the Slovak Republic,
- f) the personal data was collected in relation to offering information society services to a child under 16 years old.

The data subject will not have the right to erasure if processing is necessary for:

- a) exercising the right to freedom of expression and information;
- b) fulfilling a legal obligation,
- c) public health interests,
- d) archiving purposes in the public interest, scientific or historical research, or statistical purposes,
- e) establishing, exercising, or defending legal claims.

The controller will erase the personal data based on the request without undue delay if the request is valid.

The data subject has the right to restrict the processing of their personal data when:

- a) they dispute the accuracy of the data,
- b) processing is unlawful,
- c) the controller no longer needs the data,
- d) the data subject objects to the processing of personal data on the grounds of legitimate interest.

The data subject will be informed if the restriction is lifted.

The data subject has the right to data portability, meaning the right to receive personal data provided to the controller in a structured, commonly used, and machine-readable format, and to transfer it to another controller when the data was provided based on consent or contract.

The data subject has the right to object to the processing of personal data at any time, particularly for direct marketing purposes.

The data subject has the right not to be subject to automated individual decision-making, including profiling, that significantly affects them.

The data subject can withdraw their consent to data processing at any time.

The data subject has the right to file a complaint with the supervisory authority – the Office for Personal Data Protection of the Slovak Republic.