

PERSONAL DATA PROCESSING POLICY OF THE SLOVENSKOZALOHUJE.SK WEBSITE

1. INTRODUCTORY PROVISIONS

- 1.1** The Company **Správca zálohového systému n. o.**, with its registered office at Pluhová 192/2, 831 03 Bratislava, Slovak Republic, Company ID: 53 563 077 ("**We**" or the "**Controller**") hereby provides information on the manner and scope of the processing of your personal data, including your rights related to the processing of personal data (the "**Policy**").
- 1.2** The protection of privacy and the processing of personal data is a priority for us and the processing of personal data is treated as being strictly confidential. Your personal data is therefore handled in accordance with applicable and effective data protection legislation, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (General Data Protection Regulation) (the "**GDPR**") and Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments and Additions to Certain Acts (the "**Act**").
- 1.3** The Controller is the controller of the Website named <https://www.slovenskozalohuje.sk/>, which provides basic information on the Controller's activity of providing a deposit for plastic beverage packaging, the depositing process, reverse vending machines and other information in order to bring plastic beverage packaging deposit to the public (the "**Website**").
- 1.4** The Website Controller obtains, stores and uses (and otherwise processes) personal data, in particular of natural persons, as visitors to the Website, and in particular of those natural persons who send a supplementary question, request or other request to the Controller ("**You**" or "**Data Subjects**") via the contact details on the Website.
- 1.5** The different purposes for which specific personal data are processed are defined in more detail in Article 3 of this Policy.

2. SCOPE OF PROCESSING OF THE PERSONAL DATA

- 2.1** Data Subjects can access the Website without having to enter personal data (such as name, address or email address). However, even in this case, there is minimal acquisition, collection and storage of personal data without which it would not be possible to ensure effective access to the website.
- 2.2** In order to organise the Website in a way that makes it as user-friendly as possible, the Controller collects personal data in the form of – like many other well-known companies – so-called cookies. Cookies are small text files that are stored in the web browser you are using. These files help identify what visitors to the Website prefer. Detailed information on the processing of cookies can be found in the Cookie Policy.
- 2.3** For the purposes of handling requests for additional information and other requests that are delivered to the Controller or received via the Controller's contact details provided on the Website, we may process your personal data within the scope of the email (if it is considered a personal data), the content of your request, complaint or other request that you address to us, as well as any other personal data, such as your name and surname, that you provide to us during the contact with you.

3. PURPOSES OF PROCESSING OF THE PERSONAL DATA

- 3.1** The Controller is entitled to process personal data for the following purposes:
- (a) **processing of requests and enquiries** – processing of requests and enquiries sent to the contact details of the Controller provided on the Website and their processing;

- (b) **compliance with legal obligations** – compliance with the obligations imposed on the Controller by generally binding legal regulations; compliance with legal obligations also includes the provision of data and information to law enforcement authorities or other public authorities in accordance with the relevant legal regulations;
- (c) **interests of the Controller** – improving the functionality of the Website, customising, adjusting, improving and developing business strategies and others based on the consent of the Data Subject;
- (d) **other purposes.**

3.2 The legal bases for the processing of personal data for the individual processing purposes set out in Article 3.1 are:

- (a) Sec. 13(1)(b) of the Act; or Article 6(1)(b) of the GDPR;
- (b) Sec. 13(1)(c) of the Act; or Article 6(1)(c) of the GDPR;
- (c) Sec. 13(1)(a) or (f) of the Act; or Article 6(1)(a) or (f) of the GDPR;
- (d) any of the legal bases under Sec. 13(1) of the Act; or Article 6(1) of the GDPR;

4. PROCESSED PERSONAL DATA

4.1 In particular, the Controller is entitled to process the following personal data according to the purpose of the processing:

Data of Data Subjects	Purposes of processing:
email address, content of the request, or other information provided, such as name, surname and contact telephone number	Processing and handling of sent requests and/or enquiries; fulfilling legal obligations.
Analysis of Website activity and cookies	The Controller’s interest in improving the functionality and the Website and adapting it to the Data Subject on the basis of the Data Subject’s data provided on the basis of his/her consent.

5. METHODS OF PROCESSING OF THE PERSONAL DATA

5.1 The personal data of Data Subjects will be securely stored by the Controller in electronic or paper form. The Controller may process personal data manually or by automated means.

6. RECIPIENTS OF PERSONAL DATA

6.1 Personal data is only accessible to authorised employees and collaborators of the Controller.

6.2 To the extent permitted by law, your personal data may also be transferred to third parties outside the Controller’s company. These third parties may include in particular:

- (a) authorised service providers who provide services involving personal data to the Controller on a specific contractual basis, as well as their subcontractors; and
- (b) non-public and public places, insofar as the Controller is bound by legal obligations to such transmission.

7. PROCESSING OF PERSONAL DATA OUTSIDE OF EU/EEA

- 7.1** The processing of your personal data takes place principally within the EU, or European Economic Area, unless otherwise stated in the Cookie Policy.
- 7.2** Only in the context of the involvement of web analytic service providers may information be sent to a recipient from so-called third countries. Third countries are countries outside the European Union or countries not participating in the Agreement on the European Economic Area where a level of protection of personal data comparable to that of the European Union cannot be assumed.
- 7.3** If the transmitted information also contains personal data, then prior to such transmission the Data the Controller shall ensure that the necessary adequate protection of personal data is guaranteed in the third country concerned or with the recipient in the third country. This may result in particular from the so-called adequacy decision of the European Commission, by means of which an overall adequate protection of personal data is established for a certain third country. Alternatively, the provision of personal data can also be based on the so-called EU Standard Contractual Clauses agreed with the recipient.

8. RETENTION PERIOD OF PERSONAL DATA

- 8.1** The Controller processes personal data for the time strictly necessary to ensure the achievement of the relevant purpose or legitimate interest and further for the period for which the Controller is obliged to store the personal data under generally binding legal regulations or for the period for which the Data Subject has given consent to the processing of the data.
- 8.2** Personal data is processed by the Controller according to the purpose of processing for the following period of time:

Purpose of processing /Legal basis	Retention period
Processing and handling of requests and applications	As long as is strictly necessary to process the request and/or application, but no longer than 1 year.
Fulfilling legal obligations	For the period of time specified by the relevant legislation.
Legitimate interest of the Controller / Consent of the Data Subject (cookies)	As long as is strictly necessary for the specific purpose of the processing, or for the period for which consent has been given, unless specific legal provisions provide otherwise.

9. RIGHTS OF DATA SUBJECTS

9.1 As a Data Subject, you have the right to withdraw your consent to the processing of personal data at any time. Withdrawal of consent can be done by sending an email to the contact email address marketing@spravcazaloh.sk or also by registered letter sent to the address of the Controller's registered office. Withdrawal of consent does not affect the lawfulness of the processing of the Data Subject's personal data prior to its withdrawal. We will process the withdrawal of the Data Subject's consent to the processing of personal data as soon as possible. As a Data Subject, you also have rights in relation to the processing of personal data that arise from legal regulations and which you can exercise at any time with the Controller. These include the right to (a) access personal data, (b) rectification of inaccurate and completion of incomplete personal data, (c) erasure of personal data if they are no longer necessary for the purposes for which they were collected or otherwise processed or if it is established that they have been unlawfully processed, (d) restriction of the processing of personal data, (e) data portability; and (f) object, upon recognition of which the processing of personal data will be terminated, unless it can be demonstrated that there are material legitimate grounds for the processing which override the interests or rights and freedoms of the Data Subject, in particular where

the ground is the possible enforcement of legal claims, (g) apply to the supervisory authority, which in the Slovak Republic is the Office for Personal Data Protection of the Slovak Republic (www.uoou.sk), and (viii) file a petition to initiate proceedings pursuant to Section 100 of the Act.

- (a) **Right of access to personal data:** if you want to know whether the Controller processes your personal data, you have the right to obtain information about whether your personal data is processed and, if so, you also have the right to access your personal data. In cases of unjustified, excessive or repeated requests, the Controller shall be entitled to charge a reasonable fee for a copy of the personal data provided or to refuse the request (the above applies mutatis mutandis to the exercise of the rights set out below).
- (b) **Right to rectification of inaccurate and completion of incomplete personal data:** if you believe that the Controller is processing inaccurate or incomplete personal data about you, you have the right to request their rectification and completion. The Controller shall carry out the repair or supplementation without undue delay, but always taking into account the technical possibilities.
- (c) **Right to erasure:** if you request the erasure of your personal data, the Controller will erase your personal data if (i) they are no longer necessary for the purposes for which they were collected or otherwise processed, (ii) the processing is unlawful, (iii) you object to the processing and there are no overriding legitimate grounds for processing your personal data, or (iv) the Controller is required to do so by a legal obligation.
- (d) **Right to restriction of processing of personal data:** if you request restriction of processing, the Controller will make the personal data inaccessible, temporarily delete or store them or carry out other processing operations necessary for the proper exercise of the exercised right.
- (e) **Right to data portability:** if you want the Controller to transfer your personal data, which the Controller processes on the basis of your consent or on the basis of the Contract, to you or to a third party, you can exercise your right to data portability. If the exercise of this right could adversely affect the rights and freedoms of third parties, the Controller will not be able to comply with your request.
- (f) **Right to object:** the right to object to the processing of personal data processed for the purposes of protecting the legitimate interests of the Controller. If the Controller does not demonstrate a relevant legitimate interest in the processing which overrides the interests or rights and freedoms of the Data Subjects, the Controller shall terminate the processing without undue delay on the basis of the objection.

9.2 In the event of repeated or manifestly unjustified requests for the exercise of these rights, the Controller shall be entitled to charge a reasonable fee for the exercise of the right in question, or to refuse its exercise. You will be informed of this procedure.

9.3 The point of contact in relation to the processing of personal data is the registered office of the Controller. Information in connection with the processing of personal data will also be provided to you at the following email address gdpr@spravcazaloh.sk. You can also use the same contact details to exercise your rights. The Controller reserves the right to verify the identity of the Data Subject exercising the aforementioned rights in an appropriate manner.

9.4 The Controller is entitled to unilaterally amend or supplement this Policy at any time. In the event of a change to this Policy, the Controller shall notify the Data Subjects of such changes in good time and in an appropriate manner so that the Data Subjects have a proper opportunity to familiarise themselves with them.

10. DATE OF EFFECTIVENESS

10.1 This Personal Data Processing Policy is effective from 1/ 3/ 2024.