

**Conditions and information on personal data processing – trading partners, their employees and subcontractors, cooperating persons**

eGroup Solutions, a. s., Plynárenská 7/B, 821 09 Bratislava – mestská časť Ružinov, CIN: 44 989 709, established in accordance with the legal regulations of the Slovak Republic, kept in the Commercial Register of the District Court Bratislava I, Section Sa, Entry No. 4875/B ("eGroup Solutions, a. s.") as the controller obtains and processes personal data of data subjects, to whom it hereby provides information in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27.04.2016 on the protection of individuals with processing personal data and on the free movement of such data, repealing the Directive 95/46/EC ("GDPR") and with regard to the Act No. 18/2018Coll. on the protection of personal data and on the amendment of certain acts ("APPD").

**Right to object against personal data processing**

You can object to processing of your personal data, which is based on our legitimate interests, at any time, without stating the reasons. We need to properly assess the objection. If we do not show that we have the necessary legitimate reasons for processing your personal data and that these prevail over your interests, rights and freedoms, we will not process your personal data further.

You can send your objection in writing to: eGroup Solutions, a. s., Plynárenská 7/B, 821 09 Bratislava – mestská časť Ružinov, CIN: 44 989 709 or by email to [dpo@egroup.sk](mailto:dpo@egroup.sk).

Depending on the type of relationship with the controller, the table below sets out the purposes of personal data processing (the "PD"), from which the category of data subjects is obvious, the legal basis for their processing, the categories of processed PD, as well as the time for which the controller will process the PD.

Data subjects	Purpose of personal data processing	Legal basis for the processing of personal data	Processing time	Recipients
Employees and statutory body of the controller, trading partners, their employees and subcontractors	Accounting and business agenda	Article 6(1)(c) of the Regulation - necessary for meeting the LEGAL OBLIGATIONS of the controller resulting from the Act No. 431/2002 Coll., the Act No. 222/2004 Coll., the Act No. 40/1964 Coll., the Act No. 311/2001 Coll., the Act No. 595/2003 Coll., the Act No. 582/2004 Coll., the Act No. 283/2002 Coll. and related legislation	10 years after the year to which they relate – debt and liability books, invoice books, treasury agenda, accounting documents, bank statements; tax agenda, credit agenda (after loan repayment) and contact with banks  permanent archiving period – analyses of economic activity, annual; the accounting schedule, the chart of accounts and the guidelines; financial statements, annual; accounting statements, annual; audit; directives and guidelines, own; budget and financial plan, annual; securities issues; statistical reports and analyses, annual; profit distribution, dividend and royalties calculations; certificate of registration and assignment of tax	Entities to which the provision of PD results to the controller by law; professional consultants and advisers who are bound by legal and/ or contractual obligation of confidentiality; payroll and accounting company: Igor Tomáš, Ondava 931/99, 093 01 Vranov nad Topľou, CIN: 37 355 279;

			identification number; value added tax registration certificate	
Employees and statutory body of the controller, trading partners, their employees and subcontractors and other communicating natural persons	<b>Business communication</b>  (processing of personal data for the purpose of communicating with business partners)	<b>Processing is necessary for the purposes of legitimate interests pursued by the controller within the meaning of Article 6(1)(f) of the Regulation.</b>  The legitimate interest of the controller is: to process personal data of natural persons acting on behalf of their contractual partners (in practice, in particular suppliers and customers of goods and services and their contractual partners, external collaborating persons) in order to ensure a valid conclusion of contract (i.e. conclusion of a contract with persons authorized to act on behalf of the company which is its contractual partner); as well as its proper and effective implementation (in practice, in particular communication with relevant workers/statutory body on the part of the contractor of the controller).	5 years following the year in which the communication was terminated	Entities to which the provision of PD results to the controller by law; professional consultants and advisers who are bound by legal and/ or contractual obligation of confidentiality; payroll and accounting company: Igor Tomáš 931/99, 093 01 Vranov nad Topľou, CIN: 37 355 279; company providing planning, organizing, maintaining and controlling the technical department: PROTTO s.r.o., Slnecnicová 8, 931 01 Šamorín, CIN: 43997694
A natural person whose personal data are requested by public authorities	<b>PROVIDING PD TO PUBLIC AUTHORITIES UPON THEIR REQUEST</b>  Note the provision of PD in case of a request by a public authority, i.e. for purposes other than those of the controller	<b>Article 6(1)(c) of the Regulation - necessary for meeting the LEGAL OBLIGATIONS</b> of the controller resulting from the Act No. 171/1993 Coll., the Act No. 160/2015 Coll., the Act No. 370/1990 Coll.	The application for the provision of personal data shall be kept for 10 years following the year to which it relates	Entities to which the controller provides PD by law, professional consultants and advisers who are bound by legal and/ or contractual obligation of confidentiality.
Employees, managing agents, employees and managing agents of the business partner	<b>The public procurement documents agenda</b>	<b>Article 6(1)(c) of the Regulation - necessary for meeting the LEGAL OBLIGATIONS</b> of the controller under the Act No. 343/2015 Coll. on public procurement and on amendments and supplements to certain acts)	5 years after the year to which they relate	The contracting authority and other entities to which the provision of PD results from law to the controller; professional consultants and advisers who are bound by a legal and/or contractual obligation of confidentiality
Employees, managing agents, employees and managing agents of the business partner	<b>Provision of PD to third parties - clients for participation in projects</b>  this is a situation where the controller participates in	<b>Processing is necessary for the purposes of legitimate interests pursued by the controller within the meaning of Article 6(1)(f) of the Regulation.</b>  The legitimate interest of the controller is: to process	During the period of provision of services to clients, the longest for the duration of the employment or contractual relationship	Entities to which the provision of PD results from law to the controller; professional consultants and advisers who are bound by a legal and/or contractual obligation of confidentiality; client/potential client, tender announcer; company providing planning, organization, management and

	projects and it is not a public procurement	personal data of natural persons for participation in projects and tenders in public procurement. The third party requires proof of contact details, certifications, references, confirmation of compliance, i.e. that the controller is authorized to provide services.		control of the technical department: PROTTO s.r.o., Slnecnicová 8, 931 01 Šamorín, CIN: 43997694
Employees, trading partners and other natural persons who have access to or are in the systems of the controller	<b>NETWORK SECURITY AGENDA (IT control from the point of view of network security)</b>	<b>Article 6(1)(f) of the Regulation – LEGITIMATE INTEREST</b>  The legitimate interest is: in particular, the security of network and network facilities, the control and prevention of unauthorized access and the prevention of data theft. The legitimate interest of the controller lies in the prevention and protection of computer attacks and unauthorized access of unauthorized persons to data, protection of internal data of the controller, including the PD, operation of the internal IT systems of the controller.	1 year after the year in which the log was recorded	Entities to which the provision of PD results from law to the controller; professional consultants and advisers who are bound by legal and/ or contractual obligation of confidentiality;
Natural persons - consignors and recipients of correspondence	<b>Registry Agenda, Registry Administration, mail registration</b>	<b>Article 6(1)(c) GDPR Regulations - necessary for meeting the LEGAL OBLIGATIONS</b> of the controller resulting from Act No. 395/2002 Coll. on archives and registries and on amendments and supplements to certain acts as amended and the Act No. 305/2013 Coll. on electronic form of the exercise of public authority powers and on amendments and supplements to certain acts (e-Government Act)	Regular correspondence - 5 years following the year to which they relate serious correspondence; lists and protocols of records transferred to the Registry Centre - 10 years following the year to which they relate; 5 years after the year to which they relate; filing diaries, proposals for discarding, lists, decommissioning protocols, registration of additions to the registration centre - permanent archiving period postage books and other records of postal items - 3 years following the year to which they relate	Entities to which the provision of PD results from law to the controller; professional consultants and advisers who are bound by legal and/ or contractual obligation of confidentiality; Microsoft company providing Office 365 services and cloud storage
Cooperating persons	<b>QUALIFICATION OF COOPERATING PERSONS</b>  Note PD	<b>Article 6(1)(f) of the Regulation – LEGITIMATE INTEREST</b>	For the duration of cooperation, or 5 years from performing the	Entities to which the controller provides PD by law, professional consultants and advisers who are bound by legal

	processing is necessary for the purposes of documenting the professional qualifications of suppliers in the case of inspection (verification of whether the persons providing technical and security support have authorizations - certificates, etc.)	The legitimate interest is: processing PD of natural persons acting on behalf of their contractors (in practice, in particular contractors and other natural persons providing services), in order to ensure, in the case of inspection, that the professional qualifications of suppliers are demonstrated (verification of whether the persons providing technical and security support have authorizations - certificates, etc.) The controller is entitled to demonstrate competence for the required work	action, whichever occurs later	and/ or contractual obligation of confidentiality
A natural person with whom out-of-court settlement is conducted; natural person - party to the proceedings, party to the dispute and other interested persons, statutory body or other person authorized to act on behalf of the party to the proceedings	<b>COURT AND OUT-OF-COURT AGENDA</b>	<b>Article 6(1)(c) of the GDPR Regulation – necessary for meeting the LEGAL OBLIGATIONS</b> of the controller arising from the provisions of the Decree No. 160/2015 Coll. Civil Litigation order, the Act No. 244/2002 Coll. on arbitration, the Act No. 301/2005 Coll. Criminal order, the Act No. 7/2005 Coll. on bankruptcy and restructuring, the Act No. 314/2018 Coll. on the Constitutional Court of the Slovak Republic, the Act No. 162/2015 Coll. Administrative judicial order, the Act No. 233/1995 Coll. Enforcement order, the Act No. 307/2016 Coll. on enforcement proceedings and related legislation	10 years after the final conclusion of the relevant proceedings/out-of-court proceedings	Entities to which the controller provides PD by law, professional consultants and advisers who are bound by legal and/ or contractual obligation of confidentiality
Natural persons exercising their rights as data subjects	<b>AGENDA FOR DEALING WITH THE RIGHTS OF THE DATA SUBJECT</b>  (Records of exercised rights of data subjects under Chapter III of the Regulation 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data)	<b>Processing is within the meaning of Article 6 (1)(c) of the GDPR necessary for meeting of the LEGAL OBLIGATIONS</b> of the controller arising from the GDPR and from the Act No. 18/2018 Coll. on the protection of personal data	5 years following the year in which the application was processed	Entities to which the controller provides PD by law, professional consultants and advisers who are bound by legal and/ or contractual obligation of confidentiality
Employees, executives, employees and	<b>MARKETING AGENDA</b>	<b>Processing is in accordance with Article 6 (1)(f) of the Regulations - necessary for</b>	As long as they are a client	Entities to which the operator provides personal data based on the law; professional

executives of the business partner	note The operator is interested in sending business partners information about the news and services it provides and inviting them to the events it organizes (e.g. theater)	<p><b>the purposes of legitimate interests pursued by the operator</b></p> <p>The legitimate interest of the operator is to inform the business partner about the news and services it provides and the events it organizes for it. The operator wants to maintain good relations with the business partner and promote its goods and services.</p>		consultants and advisors who are bound by legal and/or contractual confidentiality obligations; company providing payroll and accounting agenda: Igor Tomáš Ondavská 931/99, 093 01 Vranov nad Topľou, ID number: 37 355 279; company providing the data center: SWAN, a.s., Landererova 12, Bratislava 811 09, ID number: 47 258 314
------------------------------------	--	---	--	--

Company eGroup Solutions, a. s. does not make personal data available to any third parties other than those required by law or these terms of personal data processing. eGroup Solutions, a. s. does not, by default, transfer personal data to third countries (outside the European Union / European Economic Area). In the case of Microsoft providing company tools and applications of the Microsoft Office 365 operator, the transfer may take place to third countries, specifically to the USA. The operator has concluded standard contractual clauses with the mentioned company, the text of which can be found here <https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>. eGroup Solutions, a. s. does not process personal data for the purposes of performing automated decision-making, including profiling.

In the event that for any of the purposes of processing, the contract is the legal basis for the processing of personal data, the provision of such data constitutes a contractual requirement for performance under the contract in question. In the absence of this information, it is not possible to enter into a contractual relationship or subsequent performance under the contract. If law is the legal basis for the processing of personal data, the provision of such data is a legal requirement. If this information is not provided, it is not possible to ensure proper meeting of the eGroup Solutions, a. s. 's obligations arising from the relevant general legal regulations.

We have personal data first and foremost directly from the data subject, or it is provided by his employer, business partner or we have it from publicly available sources. These are in particular contact and identification data and others related to the business and accounting agenda and communication.

In relation to the processing of personal data, the data subject shall in particular have the following rights:

- 1) upon application, request from eGroup Solutions, a. s. confirmation of whether its PD are processed or not (**access to personal data**), under what conditions, including the scope, purpose and time of their processing and information on the source of the personal data concerned;
- 2) upon application, request from eGroup Solutions, a. s. correction of incorrect or outdated personal data, or completion of incomplete personal data;
- 3) upon application, request from eGroup Solutions, a. s. **erasure/destruction of personal data** if:
  - a) personal data are no longer needed for the purpose for which they were obtained or otherwise processed,
  - b) in cases where personal data have been processed on the basis of consent and this consent to the processing of personal data has been revoked, there is no other legal basis for the processing of personal data or another legal exception;
  - c) if the data subject objects to the processing of personal data on grounds of legitimate interest and there are no legitimate reasons for the processing or the data subject objects to direct marketing;
  - d) personal data are processed illegally;
  - e) personal data must be deleted in order to comply with the legal obligation;
- 4) upon application, request from eGroup Solutions, a. s. restrictions on the processing of personal data if:
  - f) the data subject objects to the accuracy of the personal data during the period allowing eGroup Solutions, a. s. to verify the accuracy of personal data;
  - g) the processing of personal data is illegal and the data subject objects to the deletion of personal data and calls instead for restrictions on their use;
  - h) eGroup Solutions, a. s. no longer needs personal data for the purpose of processing personal data, but the data subject needs it to assert a legal claim;
- 5) where personal data are processed on consent as a legal basis, it shall have the right to withdraw that consent;
- 6) For reasons relating to its particular situation, object to the processing of personal data relating to it, which is carried out either (A) because of the necessity of a public-interest task or (B) on grounds of the legitimate interest of eGroup Solutions, a. s. as the controller in the processing of personal data, including the objection to profiling based on those legal bases (in cases, where eGroup Solutions, a. s. would perform profiling on the basis of automated decision-making);
- 7) to file an application for the opening of proceedings at the Office for the protection of personal data of the Slovak Republic.

Applications for the above rights shall be made by the data subject entitled to its exercise at the responsible person at the address [dpo@egroup.sk](mailto:dpo@egroup.sk), in person or by post at the registered office of the controller. The subject of both the e-mail and the letter should include Protection of personal data "Business partners, their employees and subcontractors".

Replies to those applications from the data subjects or measures taken on the basis of those applications shall be given free of charge. Where the application of the data subject is manifestly unfounded or disproportionate, in particular due to its repeated nature (repeated application), eGroup Solutions, a. s. has the right to charge a fee taking into account its administrative costs of providing

information or a reasonable fee taking into account its administrative costs of notification, or to take the requested action or has the right to refuse to act on such an application.

In case of doubt about compliance with the obligations related to the processing of personal data, you can directly contact eGroup Solutions, a. s., i.e. the responsible person. At the same time, you have the opportunity to file a complaint with the Office for Personal Data Protection of the Slovak Republic, with the registered office at Hraničná 12, 820 07 Bratislava 27, E-mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk), www: <https://dataprotection.gov.sk/>.

Updated on 23/11/2022