

Given at Bratislava, this 25th day of May 2018

**Dear customer,**

This information about personal data protection and privacy concerns you and your personal data since you are our customer. Our company acts as the **controller in the processing of your personal data**.

We would like to explain you how we will use personal data which we obtain from you or from third parties during the existence of our contractual relationship or after its termination.

By means of this document, we also want to fulfil our **duty to provide information pursuant to Section 13** of the Regulation of the European Parliament and Council (EU) no. 2016/679 dated 27 April 2016 on the protection of individuals with regard to the processing of personal data and the rules relating to the free movement of personal data that renders the Regulation 95/46/EC null and void (general regulation on data protection) and of the Act no. 18/2018 Coll. dated 29 November 2017 on protection of personal data and on amendments to and supplementations of certain acts.

### **Identification data of controller:**

#### **Company information**

MOLPIR, s. r. o.,

Registered office: SNP 129, 919 04 Smolenice

Place of business: Hrachová 30, 821 05

Bratislava [www.molpir.com](http://www.molpir.com)

Contact person: Ing. Peter Slovák, gdpr@molpir.com

### **1. Types of personal data**

We process the following data:

- Personal contact details. For example, your name, surname, address of residence, correspondence address, email address, contact telephone number, date of birth.
- Contact details relating to work. For example, the address of the company you represent, email address and telephone number at work.
- Contractual information. For example, the content of the contract concluded with our company, inclusive of all its amendments, scope of the provided services, type of vehicle, its designation.
- Payment information.
- Information about correspondence and communication. For example, such as email correspondence, internet data transfers and IP address.
- Access rights. Your access rights to various applications within IT infrastructure.
- Registration data including access password.
- Information concerning safety.
- **Records from the camera system.**

### **2. Purposes and objectives of data processing**

Your data will be processed for the following purposes:

- Providing of contractual services. We have to register our clients within the meaning of special regulations. The legal basis is the **fulfilment of the statutory obligation of the controller**.



- Loyalty program. Registration of the customer and sending of news about the latest offers and services connected with membership in our program. The legal basis is **the contract concluded between us and the authorized interest of the controller.**
- Direct marketing. We are engaged in the improvement of the development of our services of creation of tailor-made offers.

**The legal basis is the authorized interest of the controller.**

- Taxes and bookkeeping. For the purpose of the fulfilment of obligations arising from the tax act and other regulations relating to financial performance, we are obliged to process certain personal data. The legal basis is the **fulfilment of statutory obligations.**
- Safety and jeopardizing of operation and network. We control the functionality, safety and stability of operation of our network in which you participate. The legal basis is the fulfilment of statutory obligations and **the authorized interest of the controller.**
- At the same time, we have a camera system installed at the place of our business that protects us. The legal basis is **the authorized interest of the controller.**
- Resolution of disputes and investigation of offences. We may process personal data for the purposes of resolution of disputes, complaints or legal procedures or if there is a suspected offence which we would like to further examine. The legal basis is **the fulfilment of statutory obligations and the authorized interest of the controller.**
- Observation of law. Maybe, we will have to process your personal data in order to observe the law (for example the match of your name with names in the so-called lists of designated parties and observation of the act on money laundering) or in order to comply with the court order.
- Marketing consents. In the same way, we may use also other information exclusively on the basis of special consents which we will ask you to provide in advance. **The legal basis is the consent obtained from you.**
- Customer administration. We keep records of all our customers and their services. On the basis of an analysis of our records, we also make strategic decisions about offers for our customers. The legal basis is **the contract concluded between us and the authorized interest of the controller.**

### 3. Who has access to your data

The controller may share your data with third parties under the following circumstances:

Your personal data may be shared with other third parties that act in our name, for example with the service provider. In such cases, these third parties may use your personal data only for the purposes as described above and only in accordance with our instructions. They were contractually bound to observe security instructions regulated in the act.

**Our staff** will have access to personal data. The access has been granted only to those who need the data for their work for the above specified purposes and only if the employee is bound by the obligation to maintain confidentiality.

If the law or a court order requires so, your personal data may be shared for example with our suppliers or clients, tax authorities, social insurance authorities, **law enforcement bodies** or other government bodies.

### 4. Location of your personal data

Your personal data will be located exclusively within the European Union and the European Economic Area. Your data are protected in our systems as much as possible.

### 5. Storing of personal data

Your personal data are stored for a limited period of time and these data will be erased once they are no longer required for the purposes of processing. In most cases it means that we store your data during the existence of your relationship with us.



If it is possible, we will delete data during your relationship with us once they are no longer required. In every case, your personal records will be deleted at the latest by expiry of statutory time limits after the termination of the contractual relationship unless **the legislation does not require their storing.**

Your personal data may be processed for a longer period of time after the termination of the contractual relationship in the case of a continuing legal dispute or if you gave us the permission to long-term storage of your personal data.

## 6. Legal basis for processing of your data

In most cases, we process your personal data on the basis of the fact that processing is inevitable for the purposes of the authorized interest which we pursue, **on the contractual basis** or on the basis of your consent as the concerned person. You may withdraw your consent anytime by means of a verifiable notice on our webpage. In many cases, we will have to process also your personal data on the basis of the statutory obligation within the meaning of a special regulation. **In the case of processing on the basis of consent, you always have the option to withdraw your consent.**

## 7. RIGHTS OF CONCERNED PARTIES

It is important for you to understand that it is your personal data that we process and that we want to be aware of this fact. Even though we do not need your permission for processing of your personal data since **we are obliged to do so by law or under acts related with our contract**, you have lots of rights in connection with the processing of your personal data. The text above will answer most of your questions.

### Your rights

#### Right to access

You may request information about the method of processing of your personal data, inclusive of information about:

- Why we process your personal data
- What categories of personal data we process
- With whom we share your personal data
- How long we store your personal data or what are the criteria for determination of this time limit
- What are your rights
  - From where we obtain your personal data (if we did not obtain them from you)
  - If the processing includes automated decision-making (the so-called profiling)
  - If your personal data were transferred to the country that is outside the EEA how we will ensure the protection of your personal data.

All above-provided information is available in this document.

You may also request a copy of personal data that we process. However, additional copies will be subject to a fee.

#### Right to correction

It is important to have correct information about you and we ask you to inform us of the fact if any of your personal data is incorrect, for example if you changed your name or if you moved to a different address.

#### Right to erasure

If we process your personal data in an illegal way, for example if we process your personal data longer than it is required or without justification, you may request erasure of these data.



### **Right to limitation**

From the moment when you requested correction of your personal data or if you objected against processing until the moment we will be able to inspect the problem or confirm the accuracy of your personal data (or to change them according to your instructions), you are entitled to limited processing. That means that we (with the exception for the storing of personal data) may process your personal data only in accordance with your consent, if it is required in connection with legal claims, for protection of rights of another person or if there exists a significant public interest in the processing. You may also request from us to limit the processing of your personal data if the processing is illegal, but you do not wish to erase the personal data.

### **Right to object**

If you think that we do not have the right to process your personal data, you may object against our processing. In such cases, we may continue in the processing only if we are able to prove convincing legitimate reasons that will outweigh your interests, rights and freedoms. However, your personal data may be processed at all times if it is required for specifying, exercising or defending of legal titles.

### **Right to transfer of data**

You may request us to provide you your personal data that you provided us for processing on the basis of consent or contract in a structured, commonly used and machine-readable format. You also have the right to request transfer of this information to other data administrator.

### **Withdrawal of consent**

You have the right to withdraw your consent and we will subsequently postpone our processing activities on the basis of this legal ground.

We will inform also other parties of your request/requests to which we might have provided your personal data.

In the case of doubts, you have the right to file a petition for the commencement of proceedings within the meaning of Section 100 of the Act on Personal Data Protection with a competent supervisory body, for example through [www.dataprotection.gov.sk](http://www.dataprotection.gov.sk).

### **How can I complain about the use of my data or how can I exercise my rights?**

If you wish to lodge a complaint concerning the method of processing of your personal data, i.e. also in relation to the above-mentioned rights, you may turn to us at the email address **gdpr@molpir.com** and your suggestions and requests will be inspected.

If you are not satisfied with our answer or you think that we process your data in an unjust or illegal way, you may file a complaint with a competent supervisory body, i.e. the Personal Data Protection Authority (Slovak abbreviation ÚOOÚ). Further information about ÚOOÚ and their procedure regarding lodging of complaints can be found at: [www.dataprotection.gov.sk](http://www.dataprotection.gov.sk).

### **8. Contact data**

If you have any questions regarding processing of your personal data, you may contact us through our correspondence address:

**MOLPIR, s. r. o.**  
**Hrachová 30**  
**821 05 Bratislava**  
**gdpr@molpir.com**

