

Information provided by controller according to Article 13 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 (General Data Protection Regulation) (hereinafter referred to as the "GDPR Regulation")

Compliance with privacy policies belongs to the main goals of our company. In this regard, through our web site we fulfil our obligation to provide information to individuals whose personal data are processed in such information systems where it is not possible to fulfil our information obligation in a more direct manner.

Information to be provided when collecting personal data from the data subject, related to all information systems (hereinafter "IS"):

- The personal data controller is SCPC, s.r.o., with its registered office at Púchovská 8, 831 06 Bratislava, Slovak Republic, ID: 35 843 292, registered in the Commercial Register of the District Court Bratislava I, section: Sro, insert number: 27302 / B. (hereinafter "SCPC" or "Controller")
- The controller did not designate a data protection officer for the supervision of personal data protection as the controller does not process personal data of data subjects in the scope of Article 37 of the Regulation GDPR that would require a data protection officer to be determined.
- In cases where cross-border transfers of personal data to a third country or to an international organization should occur, the information obligation to the data subject will be additionally fulfilled, together with the notification of adequate and appropriate data protection safeguards for cross-border data transfers.
- The processing of the personal data of the data subjects by the controller does not lead to the profiling or the automated decision-making on the rights and freedoms of data subjects.
- As the data subject you have the right to request from the controller the access to personal data relating to you as the data subject, the right to rectification of inaccurate personal data (Article 16 of the GDPR Regulation), the right to erasure personal data in cases specified by law (Article 17 of the GDPR Regulation), the right to restrict the processing of personal data in cases specified by law (under which the controller will mark personal data stored in order to limit their processing in the future) (Article 18 of the GDPR Regulation), the right to the portability of personal data in cases specified by law (Article 20 of the GDPR Regulation), the right to object to the processing of personal data, in particular where the legal basis for the personal data processing of the data subject is the legitimate interest of the controller (Article 21 of the GDPR Regulation), the right to lodge a complaint with a supervisory authority concerning the personal data processing (Personal Data Protection Office, <https://dataprotection.gov.sk>), respectively to submit a proposal to initiate proceedings regarding your rights on personal data protection, for instance in case of a violation of your rights as the data subject by the controller.

Information to be provided when collecting personal data from the data subject related to specific information systems of the controller for which it is not possible to fulfil the information obligation jointly for all personal data information systems and where the information differs according to the particular personal data information systems (purposes of processing):

A. IS Trainings

Purpose of processing:	Processing of the personal data of the training participants concerning the business activity of the controller.
Legal basis of processing:	Legitimate interest of controller. In the case of regular training provided for a client, the SCPC processes personal data in this information system as a personal data processor of the client, where the client acts as controller that has to train staff because it is his statutory duty under a specific regulation. In this information system, the SCPC in the

status of controller processes personal data with regard to training, where the training is so unique and occasional that no intermediary contract with the client has yet been concluded. The legitimate interest of the SCPC to process personal data, in regards to the business activities of SCPC in this case exceeds the risks represented by the processing of personal data for the rights and freedoms of the data subjects also concerning to the scope and type of processed personal data (these are common identification data in the training records in accordance with the data minimization principle), therefore, SCPC has a legitimate interest in this processing.

Categories of recipients: Clients in the case of their own compliance monitoring activities, supervisory authorities controlling the compliance of obligations.

Retention period: 10 years.

Additional information: The provision of personal data is a legal requirement, the data subject is required to provide personal information. If the data subject fails to provide personal information, he or she will not be able to perform work for the client of controller.

B. IS Occupational injuries

Purpose of processing: Processing of personal data of persons who have suffered an occupational injury.

Legal basis of processing: Legitimate interest of controller. In the case of regular services in regard to accidents at work for a client, the SCPC processes personal data in this information system as a personal data processor of the client, where the client acts as controller that has to deal with occupational injury of employees because it is his statutory duty under a specific regulation. In this information system, the SCPC in the status of controller processes personal data with regard to occupational injuries, that are so unique and occasional that no intermediary contract with the client has yet been concluded. The legitimate interest of the SCPC to process personal data in regards to the business activities of SCPC in this case exceeds the risks represented by the processing of personal data for the rights and freedoms of the data subjects also concerning to the scope and type of processed personal data (processing may include health data, but these are processed solely in the statutory scope and for the needs of a third party, and the processing is in the interest of the data subject), therefore, SCPC has a legitimate interest in this processing.

Categories of recipients: Clients who have suffered an occupational injury, insurance company, medical facility, supervisory authorities, police, employee representatives, survivors.

Retention period: 10 years.

Additional information: The provision of personal data is a legal requirement, the data subject is required to provide personal information. If he or she fails to provide personal information, he or she will not be able to perform work for the client of controller, and the competent public authority will not have the evidence to provide insurance and to determine the liability for the cause of the occupational injury.

C. IS Audits

Purpose of processing: Processing of personal data of persons listed in the documentation that needs to be reviewed during the audit.

Legal basis of processing: Legitimate interest of controller. In the case of regular audits for a client and at client's request, the SCPC processes personal data in this information system as a personal data processor of the client, where the client acts as controller whose activity requires regular audits because it is his statutory or contractual obligation. In this information system, the SCPC in the status of controller processes personal data with regard to audits, that are so unique and occasional that no intermediary contract with the client has yet been concluded. The legitimate interest of the SCPC to process personal data in regards to the business activities of SCPC in this case exceeds the risks represented by the processing of

personal data for the rights and freedoms of the data subjects also concerning to the scope and type of processed personal data (it is a common personal data), therefore, SCPC has a legitimate interest in this processing.

Categories of recipients: Clients that receive output of audit, supervisory bodies controlling the compliance of obligations.

Retention period: 10 years.

Additional information: The provision of personal data is a legal requirement, in most cases the data subject is required to provide personal information. If he or she fails to provide personal information, the controller will not be able to provide the client with appropriate audit findings.

D. IS Inspection activities

Purpose of processing: Processing of personal data of the data subject with regard to inspection activities of the controller (e.g. registration of PPE, alcohol test, etc.).

Legal basis of processing: Legitimate interest of controller. In the case of regular inspections for a client and at client's request, the SCPC processes personal data in this information system as a personal data processor of the client, where the client has to carry out the control work of the employees because it is his statutory or contractual obligation. In this information system, the SCPC in the status of controller processes personal data with regard to inspection activities that are so unique and occasional that no intermediary contract with the client has yet been concluded. The legitimate interest of the SCPC to process personal data in regards to the business activities of SCPC in this case exceeds the risks represented by the processing of personal data for the rights and freedoms of the data subjects also concerning to the scope and type of processed personal data (processing may include health data, but these are processed exclusively within the statutory scope and for the needs of a third party to fulfil its legal obligations), therefore, SCPC has a legitimate interest in this processing.

Categories of recipients: Clients who received outputs of inspection activities, supervisory authorities controlling the compliance of obligations.

Retention period: 10 years.

Additional information: The provision of personal data is a legal requirement, the data subject is required to provide personal information. If data subject fails to provide personal information, he or she will not be able to perform work for the client of controller.

E. IS Registry administration

Purpose of processing: Processing of personal data for the purposes of registry administration after the end of the primary purpose of the processing.

Legal basis of processing: Compliance with the legal obligations of the controller (Law on Archives and Registries).

Categories of recipients: Relevant State Archive, an external archiving service provider.

Retention period: According to type of registry record and according to the legal obligation of the controller.

Additional information: The provision of personal data is a legal requirement, the data subject is required to provide personal information for registration purposes. If data subject fails to provide personal information, the controller will not be able to fulfil its legal obligations.

F. IS Clients

Purpose of processing: Processing of personal data of contact persons of SCPC clients in the ordinary course of business.

Legal basis of processing: Legitimate interest of controller. The legitimate interest of the SCPC to process personal data in regards to the business activities of SCPC in this case exceeds the risks represented by the processing of personal data for the rights and freedoms of the data subjects also concerning to the scope and type of processed personal data (it is a common personal data, and the processing is in the interest of the data subject that he or she expects), therefore, SCPC has a legitimate interest in this processing.

Categories of recipients: -

Retention period: 10 years.

Additional information: The provision of personal data is a contractual requirement or a requirement that is required for the conclusion of a contract. The data subject is not obliged to provide personal data, but if data subject does not provide personal data the controller will not be able to establish a business relationship with the client as he will not be able to process personal data about a contact person, such as its contact details or communication.

G. IS Contractors

Purpose of processing: Processing of personal data of contact persons of SCPC suppliers in the ordinary course of business.

Legal basis of processing: Legitimate interest of controller. The legitimate interest of the SCPC to process personal data in regards to the business activities of SCPC in this case exceeds the risks represented by the processing of personal data for the rights and freedoms of the data subjects also concerning to the scope and type of processed personal data (it is a common personal data, and the processing is in the interest of the data subject that he or she expects), therefore, SCPC has a legitimate interest in this processing.

Categories of recipients: -

Retention period: 10 years.

Additional information: The provision of personal data is a contractual requirement or a requirement that is required for the conclusion of a contract. The data subject is not obliged to provide personal data, but if data subject does not provide personal data the controller will not be able to establish a business relationship with the supplier as he will not be able to process personal data about a contact person, such as its contact details or communication.

H. IS Correspondence

Purpose of processing: Processing of requested and unsolicited personal data in correspondence before disposal of unneeded correspondence.

Legal basis of processing: Legitimate interest of controller. The legitimate interest of the SCPC to process personal data in regards to the business activities of SCPC in this case exceeds the risks represented by the processing of personal data for the rights and freedoms of the data subjects also concerning to the scope and type of processed personal data (it is a common personal data, and the processing is in the interest of the data subject that he or she expects), therefore, SCPC has a legitimate interest in this processing.

Categories of recipients: -

Retention period: Requested 10 years, unsolicited is not retained

Additional information: The provision of personal data is a contractual requirement or a requirement that is required for the conclusion of a contract. The data subject is not obliged to provide personal data, but if data subject does not provide personal data the controller will not be able to identify the sender of the consignment.

I. IS Marketing

Purpose of processing: Processing contact details of existing clients for direct marketing purposes.

Legal basis of processing: Legitimate interest of controller. The legitimate interest of the SCPC to process personal data in regards to the business activities of SCPC in this case exceeds the risks represented by the processing of personal data for the rights and freedoms of the data subjects also concerning to the scope and type of processed personal data (these are common personal data, it is a legitimate interest which the GDPR Regulation assumes in the recital 47), therefore, SCPC has a legitimate interest in this processing.

Categories of recipients: -

Retention period: 10 years.

Additional information: The provision of personal data is a contractual requirement or a requirement that is required for the conclusion of a contract. The data subject is not obliged to provide personal data. If data subject does not provide personal data the controller will not be able to address the person concerned with the range of services he might be interested in, taking into account his previous interest in the services of the controller.

J. IS Mediation of suppliers and services

Purpose of processing: Processing of personal data of potential suppliers and contact persons of suppliers who are legal entities when selecting a supplier for the required service for the client.

Legal basis of processing: Legitimate interest of controller. The legitimate interest of the SCPC to process personal data in regards to the business activities of SCPC in this case exceeds the risks represented by the processing of personal data for the rights and freedoms of the data subjects also concerning to the scope and type of processed personal data (it is a common personal data, it is a processing in the interest of the data subject that he or she expects), therefore, SCPC has a legitimate interest in this processing.

Categories of recipients: Clients for whom a supplier is selected.

Retention period: 10 years.

Additional information: The provision of personal data is a contractual requirement or a requirement that is required for the conclusion of a contract. The data subject is not obliged to provide personal data, but if the data subject does not provide personal data the controller will not be able to communicate its personal data to the client in order to establish cooperation between client and the data subject.

K. IS Business Cards

Purpose of processing: Processing of personal data from the provided business cards.

Legal basis of processing: Legitimate interest of controller. The legitimate interest of the SCPC to process personal data in regards to the business activities of SCPC in this case exceeds the risks represented by the processing of personal data for the rights and freedoms of the data subjects also concerning to the scope and type of processed personal data (it is a common personal data, it is a processing in the interest of the data subject that he or she expects), therefore, SCPC has a legitimate interest in this processing.

Categories of recipients: -

Retention period: 3 years.

Additional information: The provision of personal data is a contractual requirement or a requirement that is required for the conclusion of a contract. The data subject is not obliged to provide personal data, but if the data subject does not provide personal data the controller will not be able to keep its contact information in a clear manner for possible cooperation with the data subject.

The controller has taken reasonable security measures to ensure the security of personal data processed in all of the above-mentioned information systems and has documented the security measures outlined in the SCPC Security Project.