

Information on the collection and processing of personal data

pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as 'the Regulation' or 'GDPR'); and pursuant to Act no. 18/2018 Coll. of Slovak Republic on the protection of personal data and on amendments to certain acts (hereinafter referred to as the "Act")

Controller - ISO Management, s.r.o. located at Údolná 226/3, 010 03 Žilina, IČO: 51903661, registered in the Commercial Register Žilina OS, section: Sro., insert no. 70832 / L, **hereby informs the persons concerned of the collection and processing of their personal data.**

This information is intended for our customers as well as employees of our customer, who is a legal entity or sole trader, appointed for individual areas of communication related to deliveries under contractual relations.

Privacy Policy

We only process your personal data under the legal conditions specified in the regulation or the law. As the controller, we are responsible for protecting your personal information that we have collected about you in accordance with the Regulation and the law to the extent and in accordance with this information. If you have any questions regarding the processing of your personal data, you can contact us personally or by post at our registered address, by phone on tel. +421 910 959 201 or by e-mail: info@isomanagement.sk.

Collection of personal data

In particular, we collect your personal data directly from you when you voluntarily provide it to us in connection with a request for our services, which you address to us personally, by telephone, in writing, by mail or electronically via email and through our contact form on the website www.isomanagement.sk, based on your request.

If you are an employee of our customer who is a legal entity or a sole trader who has designated you as your authorized person for individual areas of communication concerning the delivery of services under contractual relations, we collect personal data from your employer; the provision of the data contained in this information is without prejudice to your employer's duty of information to the extent provided for in Article 13 of the Regulation, respectively § 19 of the Act in the collection and processing of your personal data in connection with the employment relationship of the employee and the employer.

Categories of personal data collected and processed

We will only collect and process your routinely personal data to the extent necessary in the framework of our activities related to securing and providing our services. We will not process special category of personal data revealing your racial or ethnic origin, political opinions, political or philosophical beliefs, trade union membership, genetic data, biometric data, sexual orientation, or other sensitive personal information about you. **We process your personal data primarily to the following extent:**

Identification data: name, surname, employer (company name, address, company ID, VAT number), job position (function classification), department, signature.

Contact details: delivery address, email address, and phone number.

Data on deliveries and discounts: order history, purchased service, price of purchased service, data related to terms of service, data on provided discounts.

Bank, financial, and transaction details: bank account information, payment information.

Online identifiers: cookies.

Recipients of personal data

All of your personal data will only be processed and stored in our internal systems and will be provided by us to other recipients only if it is necessary to achieve the purpose of the processing or under a legal obligation under special legislation.

The recipients of personal data may be:

- control, supervisory and other state bodies within the scope of their activities pursuant to a special legal regulation (eg Slovak Trade Inspection, Office for Personal Data Protection, Tax Office, etc.),
- courts and law enforcement authorities at their request or within the legitimate interests of the controller in establishing, asserting and defending legal claims;
- contracted service providers, such as IT service providers, postal and forwarding services, financial and insurance services,
- other recipients to whom the controller is obliged to provide personal data in accordance with a specific law or a legitimate interest, such as auditors, legal advisers, tax and accounting advisors, insurance companies, banks, credit registers, third parties evaluating the use of our contractors, are in a labor-law or other similar relationship with us to the extent necessary for the performance of their work or rights, and which, in relation to the personal data provided or made available, will have the extent and under the terms agreed in the written agreement, which we enter into with them or established by generally binding legal regulations, the obligation of confidentiality about such information.

Purpose of personal data processing

We will collect and further process your personal data for the following purposes:

- **conclusion and performance of the contract;** To perform contractual obligations or take action at your request before we enter into a contract with you, in particular for the purpose of processing and sending quotations, preparing and concluding contracts, recording contracts, including any changes to them in our internal system, reviewing contractual performance and contractual obligations in particular in the framework of sales and framework contracts, as well as other obligations relating to contract management, takeover and handover of the subject of the contract, settlement of claims, settlement of claims and complaints, invoicing, recovery of damages and receivables arising in connection with delivery of services; documentation and records, mutual communication of the contracting parties, etc. **The legal basis for processing your personal data for this purpose is** art. 6 par. 1 letter b) and c) of the Regulation, it means fulfillment of the contract and fulfillment of the legal obligations of the operator resulting mainly from the Act of the National Council of the Slovak Republic no. 513/1991 Coll. Commercial Code as amended. The provision of personal data by the data subject is a contractual requirement in this case. In the absence of personal data, it will not be possible to enter into a contractual relationship with the data subject.
- **direct communication;** For the purpose of communicating directly with you to answer your questions and meet your requests sent by e-mail or via our web form, we may ask you for your contact details based on the nature or purpose of the communication. If you send us service orders, other requests, we may need to contact you to get additional information necessary to process or fulfill your order or request. For this purpose, as well as the purpose of the requested service, the processing of personal data is essential. **The legal basis in this case is** art. 6 par. 1, letter (b) and (f) of the GDPR. In this context, it is in our interest to meet your requirements.
- **management and preparation of accounting documents;** In particular, the administration and invoicing of the price for the supply of services, the processing of accounting, tax documents and invoices. **The legal basis for the processing of your personal data for this purpose is** the provision of art. 6 par. 1, letter c) of the Regulation, it means fulfillment of our legal obligations arising in particular from Act no. 431/2002 Coll. on Accounting, as amended (hereinafter referred to as the "Act on Accounting"), Act no. 222/2004 Coll. on Value Added Tax, as amended, etc.

- **mail registration and registry administration;** Records and administration of mail, mail delivered and sent to and from the electronic mailbox, and records and archiving of contracts, accounting, tax and related documents in our internal systems. **The legal basis for the processing of your personal data for this purpose is** the provision of Art. 6 par. 1, letter c) of the Regulation, it means fulfillment of the legal obligation of the controller pursuant to special regulations, in particular pursuant to the Act on Accounting and Act No. 395/2002 Coll. on archives and registries and on amendments to certain acts.
- **zabezpečenie funkčnosti našej webovej stránky;** zaznamenávame a ukladáme cookies, aby sme zabezpečili funkčnosť našej webovej stránky a prispôbili prevádzku stránky Vaším potrebám. **Právnym základom v tomto prípade** je čl. 6 ods. 1 písm. b) a f) GDPR. V tomto kontexte je v našom záujme, čo sa týka spracovania osobných údajov, zabezpečiť riadne fungovanie našej webovej stránky a podnikania uskutočňovaného cez našu webovú stránku.
- **ensuring the functionality of our website;** We record and store cookies to ensure the functionality of our website and to adapt the operation of the website to your needs. **The legal basis in this case is** Art. 6 par. 1, letter (b) and (f) of the GDPR. In this context, it is in our interest as regards the processing of personal data to ensure the proper functioning of our website and the business conducted through our website.

Period of retention of personal data

We will process your personal data for as long as necessary for the purposes of their processing, but for the longest duration of the contractual relationship. In the event that we pursue legal claims against you and conduct legal or administrative proceedings, or if you claim legal claims against us and conduct legal or administrative proceedings against us, personal data will be processed to establish, assert or defend legal claims until the legal end such proceedings.

After termination of the contractual relationship, respectively after the legal end of the previous sentence, your personal data will only be stored (archived) for a period of 10 years from the termination of the contract, because the obligation to retain the contract and accounting and tax documents related to the contract containing your personal data generally binding regulations, especially from the Act on Accounting. After this time, data will be deleted, respectively impaired / shredded.

Depending on the nature or purpose of the communication, the retention period of contact information obtained through our web form or by e-mail may differ expressly in accordance with this Privacy Policy.

Transfer to third countries or to an international organization

Your personal data is not provided to third countries or an international organization and we do not intend to transfer such personal data.

Automated decision making, including profiling

There is no automated decision-making or profiling process when we process your personal data.

Cookies

For pro-user websites and customizing the operation of our website to your needs, our website may use cookies. A cookie is a small file that is stored locally on your computer when you visit a website. For example, when you visit a website on the same device, a cookie indicates that you are a repeat visitor. Cookies also allow us to analyze the use of our website. Cookies do not identify you on third-party websites. We use the following types of cookies:

Basic / essential cookies

These cookies are essential for the functioning of our website. This includes, for example, issuing anonymous session IDs to summarize multiple queries to a web server or ensuring that registrations and orders work properly.

Functional cookies

These cookies help us save your preferences or support other features while you are on our website. For example, they allow us to remember your preferred settings for your next visit or to save your login information on our website.

Performance cookies / statistics

These cookies collect information about how you use our website (for example, which browser you use, how often you visit our website, which pages you open, or how long you stay on our website). These cookies do not store any information that personally identifies visitors. The information collected by these cookies is aggregated and thus anonymous.

You can accept or decline cookies - including those used to track websites - by selecting the appropriate settings for your browser. You can set your browser to notify you when you receive a new cookie, or block it altogether. However, if you choose to decline cookies, you may not be able to use all the features of our website (for example, for purchase orders). Your browser also offers the ability to delete cookies (for example, using the Clear Browsing History feature). For more information, see User Settings under Settings in your web browser.

Rights of the data subject in relation to the protection of personal data

In relation to the processing of your personal data, you have the following rights in addition to the above rights:

- a) the right of **access** to personal data (Article 15 of the Regulation); You have the right to obtain confirmation from us that we are processing your personal data and, if so, you have the right to have access to such personal data (copies thereof) as well as additional information to the extent set out in Article 15 of the Regulation. In most cases, we will provide you with these copies of your personal information and additional information in writing, unless otherwise requested. If you have requested this information by electronic means, it will be provided to you electronically, if technically possible.
- b) the right to **rectify** personal data (Article 16 of the Regulation); We take reasonable steps to ensure the accuracy, completeness and timeliness of the information we have about you. However, this right allows you to require us to correct your incorrect personal information or add your personal information without undue delay if it is inaccurate, incomplete or outdated. Please note that you are only required to provide us with personal information that is complete and correct, and you are responsible for the inaccuracy of the personal information you have given us.
- c) the right to **delete** personal data ('forgotten' right) (Article 17 of the Regulation), without undue delay after exercising that right, for example if your personal data are no longer necessary for the purpose for which we have them obtained or processed if you have withdrawn your consent to the processing of personal data under which we process your personal data and there is no other legal basis for the processing of personal data (for example, the Agreement we have with you) if you object to the article 21, section 1 of the Regulation or if your personal data are processed in violation of the Regulation and the law. However, this right of yours must be assessed in the light of all relevant circumstances. For example, we may have certain legal and regulatory obligations, which means that we will not be able to comply with your request.
- d) the right to **restrict the processing** of personal data (Article 18 of the Regulation); in legally prescribed cases, you have the right to require us to stop processing your personal data, eg. if you object to the accuracy of the personal information we hold about you, but only during a period allowing us to verify the accuracy of your personal data, you object to the processing of personal data by automated decision making or the processing of your personal data is against the law and law and instead, you are requesting a restriction on their use or objecting to the deletion of your personal data, which we as the controller no longer need and want to delete, but you need it, for example, to prove, enforce or defend your legal claims in an ongoing lawsuit.
- e) the right to **transfer** personal data (Article 20 of the Regulation), that is, the right to obtain from us your personal data which you have previously provided us in a structured, commonly used and machine-readable format and have the right to request that to another controller, subject to legal conditions; exercising this right is without

prejudice to your right to delete personal data. However, the right to portability only applies to personal data that we have obtained from you with the consent or under the Agreement to which you are a party.

- f) the right to **object to the processing** of personal data (Article 21 of the Regulation) if the processing of your personal data is based on our legitimate legitimate interest or if we process your personal data for the purposes of direct marketing, including profiling in such processing. If you object and we do not prove a valid legitimate legitimate reason for the processing of your personal data, or if you object to the processing of your personal data for direct marketing purposes, we will not further process your personal data for that purpose.
- g) the right **not to be subject to a decision based solely on the automated processing of personal data**, including profiling, if such automated decision-making and profiling would have legal effects or significantly affect you (Article 22 of the Regulation). However, as we said, there is no automated decision-making or profiling process when we process your personal information,
- h) the right **to lodge a complaint with the Authority** (Article 77 of the Regulation); if you believe that the processing of your personal data is contrary to the Regulation or Act of the National Council of the Slovak Republic No. 18/2018 Z.z. on the protection of personal data and on amendments and supplements to certain acts, you may file a complaint (petition to initiate proceedings on personal data protection pursuant to protection of personal data of the Slovak Republic. Office contact details:

Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27
www.dataprotection.gov.sk, Tel.: +421 / 2/3231 3214, E-mail: statny.dozor@pdp.gov.sk.

You can exercise your rights by sending a written request by post to the address of the company (sample form can be found [here](#)) or electronically by e-mail: info@isomanagement.sk.

Date of issue and effectiveness of 'Information on the collection and processing of personal data': 25th May 2018.