

Provision of information and announcements to data subjects relating to the processing of their personal data

The purpose of the information below is to provide information concerning the processing of personal data by Alanata a. s. within the meaning of the provisions of 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 (hereinafter referred to as the GDPR).

Ensuring the protection of the personal data we process in the provision of our services is very important to Alanata a. s. and we have therefore taken appropriate technical and organisational measures to protect it. At the same time, Alanata a. s. carries out the processing of personal data in accordance with the requirements arising from the GDPR and Act No. 18/2018 Coll. on the Protection of Personal Data, as amended.

In case of any questions related to the processing of your personal data, you can address these questions to the responsible person of Alanata a. s. (contact details below).

Part I Basic information on the operator

1.Operator:

*Alanata a. s.
Krasovského 14
851 01 Bratislava 5
Slovak Republic*

*ID: 54 629 331
Tel: +421 (2) 32 112 500
e-mail: info@alanata.sk*

2.Responsible person:

*Tel: +421 (2) 32 112 503
e-mail: dpo@alanata.sk
postal address: Alanata a. s., Krasovského 14, 851 01 Bratislava 5, Slovak Republic (indicate on the envelope "Intended for DPO")*

3.Information on the rights of the data subject:

a. Right to access personal data

You have the right to confirm whether we are processing personal data relating to you. If this is the case, you have the right to obtain information about the processing of your personal data within the scope of Article 15 of



the GDPR. At the same time, you have the right to obtain a copy of the personal data we process about you.

b. Right to rectification

If you discover that we are processing incorrect or incomplete personal data about you, you have the right to have it corrected or completed.

c. Right to withdraw consent

If you have given us your consent to the processing of your personal data, you have the right to withdraw your consent without affecting the lawfulness of the processing based on your consent prior to its withdrawal.

d. Right to erasure

You have the right to obtain the erasure of the personal data we process about you. However, the exercise of this right is preceded by an individual assessment of your request and will not be exercised if further processing of your personal data is necessary for one of the purposes listed in Article 17 of the GDPR, in particular to comply with a legal obligation, to fulfil a legitimate interest of the controller, for archiving purposes in the public interest or for the establishment, exercise or defence of legal claims.

e. Right to restriction of processing

You have the right to restrict the processing of your personal data that we process about you for the reasons set out in Article 18 of the GDPR. You can exercise this right in particular if our organisation no longer has a need to process your personal data, but the data is necessary for you to prove the exercising or defence of your legal claims.

f. Right to data portability

Where we process your personal data that you have provided to our organisation on the basis of your consent or on the basis of a signed contract and we process that personal data by automated means, you have the right to obtain the personal data relating to you that you have provided to us in a structured, commonly usable and machine-readable format. If you request us to do so, we will transfer the data to another controller designated by you, unless there are legal or other impediments to doing so.

g. Right to object and automated individual decision-making

You have the right to object to the processing of personal data that we carry out on the basis of legitimate interest or in connection with the performance of direct marketing activities, as well as to object to profiling for the aforementioned purpose. If you discover or believe that we are processing



personal data in violation of the protection of your private and personal life or in violation of the law, please contact us and ask us to explain or remedy the inappropriate situation.

h. Right to lodge a complaint with a supervisory authority

You can contact the supervisory authority with your complaint about the processing of personal data:

Office for Personal Data Protection of the Slovak Republic

Hraničná 12

820 07 Bratislava

ID: 36 064 220

Tel: +421 (2) 323 13 220

Web: <https://dataprotection.gov.sk/uouu/>

4. Contact details for exercising the rights of the data subject:

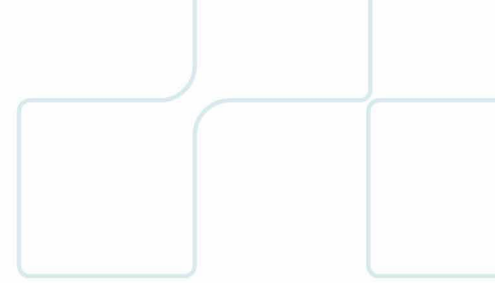
The individual rights referred to in point 3 can be exercised by calling +421 (2) 32 112 503, by sending an e-mail request to dpo@alanata.sk, or by sending a written request to the registered office of the operator Alanata a. s. at Krasovského 14, 851 01 Bratislava 5, Slovak Republic (on the envelope indicate "Intended for the DPO").

All information and statements regarding the rights you claim from us are provided free of charge and will be provided to you no later than 1 month after receipt of your request. This deadline may be extended by a further 2 months if necessary, depending on the complexity of the application and the number of applications. If a request is manifestly unfounded or unreasonable, in particular because it is repetitive, we are entitled to charge a reasonable fee which takes into account the administrative costs involved in providing the information requested. We reserve the right to charge a reasonable fee for administrative costs for repeated requests for copies of the personal data processed for this reason.

If you contact us via one of the above mentioned communication channels, we will use the data provided by you (your e-mail address, or your name, surname and telephone number) to answer your questions or to process your request, i.e. to process your rights. We will restrict the processing of the data for a period of 5 years if it is no longer necessary to answer your questions or to process your request(s), in case we need to prove, exercise or defend related legal claims.

If we have reasonable doubt about your identity in connection with the exercise of individual rights, we may request additional information to confirm your identity.





Part II Information on processing activities

1. Processing activity: Personnel and payroll management – Processing of personal data of job applicants

- a. Purpose of processing personal data:
Selection of job applicants.
- b. Legal basis for the processing of personal data:
The processing of personal data is necessary in order to carry out pre-contractual measures at the request of the data subject. The processing of personal data is at the same time a legal requirement, while it is necessary to comply with the obligations of Act No. 311/2001 Coll., the Labour Code, as amended, and in selected cases on the basis of the consent of the data subject.

In the absence of personal data, it is not possible to ensure the selection of the employee and the subsequent conclusion of the employment or similar relationship. In the event of not providing consent to the processing of applicants' personal data for the purpose of storing it for future reference, all personal data submitted will be discarded after the end of the selection procedure.

- c. The personal data processed and the sources from which the personal data originate:

Categories of personal data processed:

- job applicants:
 - title, first name, last name,
 - contact details (permanent address, telephone number, e-mail),
 - application for employment,
 - cover letter,
 - education,
 - course of previous employment,
 - Curriculum Vitae.

The source from which the personal data is obtained:

- job applicants,
- recruitment agencies,
- web portal www.profesia.sk.

- d. Retention period for personal data:
The personal data of job applicants are stored only for the duration of the selection procedure and then the data of unsuccessful applicants are deleted



without delay. If consent is obtained from the candidate for the processing of personal data for the purpose of contacting them in the future, the personal data is processed for 2 years from the date of the selection procedure and then subsequently disposed of.

- e. Categories of personal data recipients:
Authorised persons of Alanata a. s.
Suppliers providing administration, operation and support of infrastructure systems for Alanata a. s.
- f. Transfer of personal data to a third country or international organisation:
There is no transfer of personal data to third countries or international organisations.
- g. The existence of automated decision-making, including profiling:
No automated decision-making or profiling is carried out with personal data.

5.Processing activity: Personnel and payroll management

- a. Purpose of processing personal data:
Fulfilling the rights and obligations of the employer related to the employment or similar relationship, in particular in the following activities:
 - maintenance of personal files,
 - recording and processing of staff timesheets,
 - fulfilment of levies and deductions to health insurance companies, social insurance companies, tax administrators, DDS, DDP, etc.,
 - professional and qualification development of employees and training in the principles and rules for the performance of work on the company's premises according to the integrated management system,
 - ensuring health and safety at work in accordance with the requirements of Act No. 124/2006 Coll. on Health and Safety at Work,
 - keeping records of staff business trips and arranging travel arrangements,
 - keeping records of service/officer motor vehicles and dealing with damage incidents related to vehicle operation,
 - making photographic images accessible within society.
- b. Legal basis for the processing of personal data:
The processing of personal data is necessary for the performance of the contract and is at the same time a legal requirement and is necessary for the fulfilment of the following legal obligations:
 - Act No. 311/2001 Coll., the Labour Code as amended,



- Act No. 580/2004 Coll. on Health Insurance, and on Amendments and Supplements to Act No. 95/2002 Coll. on Insurance, and on Amendments and Supplements to Certain Acts, as amended,
- Act No. 461/2003 Coll. on Social Insurance, as amended,
- Act No. 595/2003 Coll. on Income Tax, as amended,
- Act No. 43/2004 Coll. on Old-Age Pension Savings, as amended,
- Act No. 650/2004 Coll. on Supplementary Pension Savings and on Amendments and Supplements to Certain Acts, as amended,
- Act No. 5/2004 Coll. on Employment Services and on Amendments and Supplements to Certain Acts, as amended,
- Act No. 462/2003 Coll. on Income Compensation for Temporary Disability of an Employee and on Amendments and Supplements to Certain Acts, as amended,
- Act No. 570/2005 Coll. on Conscription and on Amendments and Supplements to Certain Acts, as amended,
- Act No. 283/2002 Coll. on Travel Allowances, as amended,
- Act No. 563/2009 Coll. on Tax Administration as amended,
- Act No. 152/1994 Coll. on the Social Fund and on Amendments and Supplements to Act No. 286/1992 Coll. on Income Taxes, as amended,
- Act No. 355/2007 Coll. on the Protection, Promotion and Development of Public Health, and on Amendments and Supplements to Certain Acts, as amended,
- Act No. 124/2006 Coll. on Health and Safety at Work, and on Amendments and Supplements to Certain Acts, as amended,
- Act No. 39/2015 Coll. on Insurance, as amended,
- Act No. 18/2018 Coll. on the Protection of Personal Data, as amended (§ 78, paragraph 3).

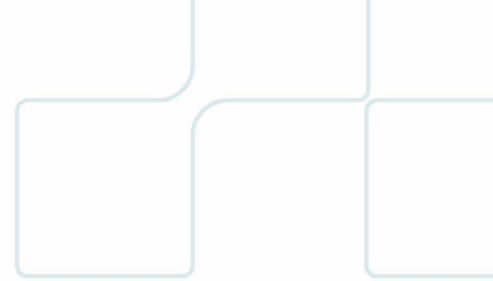
At the same time, the processing of the employee's photo and its disclosure to other employees within the company is a legitimate interest of the company, in order to ensure its unambiguous identification in communication between employees of the company.

Personal data of the company's employees beyond the data of title, name, surname, job title and contact details and photographs of employees disclosed to other employees within the Company are disclosed only on the basis of their consent.

Providing consent to the disclosure of an employee's personal data is voluntary.

- c. The personal data processed and the sources from which the personal data originate:





Categories of personal data processed:

- employees:
 - title, name, surname, maiden name,
 - birth number,
 - identity card number,
 - date and place of birth,
 - photo,
 - signature,
 - marital status, number of children,
 - nationality, citizenship,
 - contact details (permanent address, temporary address, telephone number, e-mail address),
 - sex,
 - legal capacity,
 - date of employment, reason for employment, date of termination, method of termination, type of employment,
 - personal number,
 - an extract from the criminal record,
 - breach of work discipline,
 - entitlement to an old-age pension,
 - reduced ability to work, temporary disability,
 - employee evaluation,
 - job classification, organisational unit,
 - working time fund,
 - employee education, training and courses,
 - salary, wages or salary ratios and other financial data, employee's bank account details, deductions from salary,
 - leave taken, sick leave, limited medical examinations,
 - attendance / time worked data,
 - entitlements granted for the performance of an official function or for the performance of an occupational activity,
 - income tax declaration, tax bonus, application of the reduction of the old-age insurance premium rate,
 - proof of receipt of state social benefits (parental allowance, childcare allowance, etc...),
 - marriage certificate (photocopy),
 - confirmation of taxable income for the current year / confirmation of taxable wages, confirmation of registration from the Central Office of Labour, Social Affairs and Family,
 - a decision from the Social Insurance Institution on the awarding of invalidity, old-age and retirement pensions,
 - credit for years of service,
 - contract with supplementary pension savings (3rd pillar),



- disability card, decision of the Central Office of Labour, Social Affairs and Family on the degree of reduction of disability,
- pregnancy booklet, doctor's certificate of pregnancy,
- private vehicle registration card details,
- family members and close relatives,
 - data on the spouse, children, parents of children in the scope of name, surname, date of birth, birth number, address,
 - data on family members in the range of name, surname, address, date of birth,
 - proof of spouse's income,
 - birth certificates, school attendance certificates for children over 16 for whom the employee claims a tax bonus.

The source from which the personal data is obtained:

- employees.

d. Retention period for personal data:

Personal data of employees and their family members and close persons are stored in accordance with the requirements of the relevant laws governing employment relations and Act No. 395/2002 Coll. on Archives and Registers for a period of time:

- employee's personnel file: when an employee reaches the age of 70 it is subsequently disposed of,
- pay slips (pension and savings data): 50 years,
- employment tax records: 10 years,
- payrolls: 10 years,
- wage documents, deductions from wages, compensation for incapacity for work: 5 years,
- records of attendance, leave, unpaid leave, sick leave, maternity leave: 5 years,
- health and safety at work, catering for employees: 5 years,
- public health insurance (applications, opt-outs, changes, statements, annexes, calculation documents, annual tax settlement): 10 years,
- social insurance (applications, opt-outs, changes, statements, annexes, calculation documents, sickness benefits, accidents, damages): 10 years,
- agreements on labour activity, on work performance, on the temporary work of students since the record was made without contributions to the Social Insurance Institution: 5 years from execution,
- other data related to the performance of the employee's activities: 5 years.

e. Categories of personal data recipients:

Authorised persons of Alanata a. s.



Personal data is processed by the following processors:

- training organisations carrying out selected training of Alanata a. s. employees,
- companies providing payroll and accounting processing and automated payroll processing support.

Personal data of employees may be provided or disclosed to the following recipients in accordance with applicable legislation:

- Social Insurance Office,
- health insurance companies,
- supplementary pension savings institutions,
- pension management companies,
- insurance companies (claims settlement),
- Tax Office of the Slovak Republic,
- Central Office of Labour, Social Affairs and Family,
- courts and law enforcement authorities,
- government bodies and public authorities for control and supervision (e.g. labour inspectorate),
- executors.

- f. Transfer of personal data to a third country or international organisation:
There is no transfer of personal data to third countries or international organisations.
- g. The existence of automated decision-making, including profiling:
No automated decision-making or profiling is carried out with personal data.

6. Processing activity: Reporting of anti-social activities

- a. Purpose of processing personal data:
Ensuring the fulfilment of the tasks arising for Alanata a. s. from Act No. 54/2019 Coll. on the Protection of Whistleblowers of Anti-Social Activity, and on Amendments and Supplements to Certain Acts, in connection with the reporting of facts of which a natural person has become aware in connection with the performance of his or her occupation, profession, position or function and which may contribute or have contributed to the clarification of a serious anti-social activity or to the detection or conviction of its perpetrator.
- b. Legal basis for the processing of personal data:
The processing of personal data is a legal requirement. The processing of personal data is necessary to meet the requirements of Act No. 54/2019 Coll. on the Protection of Whistleblowers of Anti-Social Activity, and on Amendments and Supplements to Certain Acts, as amended.



- c. The personal data processed and the sources from which the personal data originate:

Categories of personal data processed:

- whistleblower – the person who has submitted a notification/qualified notification (hereinafter referred to as "notification") within the scope of the notification register:
 - date of receipt of the notification,
 - name, surname and residence of the whistleblower,
 - subject of the notification,
 - result of the examination of the notification,
 - date on which the verification of the notification ends,
- data in the scope of the "Request for Consent" to the Authority to take legal action or make a decision in an employment relationship against a protected whistleblower to which the whistleblower has not consented,
- data on perpetrators or other natural persons who may contribute or have contributed significantly to the clarification of a serious anti-social activity or to the identification or conviction of its perpetrator:
 - name and surname, address,
 - other information relating to the persons named in the notification and relevant to the notification.

The source from which the personal data is obtained:

- the person who made the notification.

- d. Retention period for personal data:

Personal data are stored in accordance with the requirements of Act No. 54/2019 Coll. on the Protection of Whistleblowers of Anti-Social Activity, and on Amendments and Supplements to Certain Acts, and Act No. 395/2002 Coll. on Archives and Registers for a period of 3 years from the processing of the notification and are subsequently disposed of.

- e. Categories of personal data recipients:

Authorised persons of Alanata a. s.

Personal data may be provided or disclosed in accordance with applicable legislation:

- Whistleblower Protection Office,
- National Labour Inspectorate,
- courts,
- law enforcement authorities.

- f. Transfer of personal data to a third country or international organisation:



There is no transfer of personal data to third countries or international organisations.

- g. The existence of automated decision-making, including profiling:
No automated decision-making or profiling is carried out with personal data.

7.Processing activity: Management of the accounting agenda

- a. Purpose of processing personal data:
Maintaining the accounting agenda necessary to account for business cases, including invoicing and contract execution, as well as payroll and other benefits from an accounting point of view.
- b. Legal basis for the processing of personal data:
The processing of personal data is a legal requirement. The processing of personal data is also necessary to comply with the following legal obligations:
 - Act No. 431/2002 Coll. on Accounting,
 - Act No. 222/2004 Coll. on Value Added Tax,
 - Act No. 563/2009 Coll. on Tax Administration (Tax Code),
 - Act No. 40/1964 Coll., the Civil Code,
 - Act No. 513/1991 Coll., the Commercial Code,
 - Act No. 595/2003 Coll. on Income Tax and related regulations.
- c. The personal data processed and the sources from which the personal data originate:
Categories of personal data processed:
 - the parties and employees of Alanata a. s.:
 - title, first name, last name,
 - address of permanent residence (for legal entities, the address of the company's registered office),
 - name of the organisation (for legal entities only),
 - contact details,
 - billing information,
 - date of birth (ID number for legal entities).
The source from which the personal data is obtained:
 - the data subject,
 - the employer of the data subject.
- d. Retention period for personal data:
Personal data are stored in accordance with the requirements of the laws governing accounting and taxation and Act No. 395/2002 Coll. on Archives and



Registers for a period of 10 years from the creation of the accounting document and are then subsequently disposed of.

e. Categories of personal data recipients:

Authorised persons of Alanata a. s.

Personal data is processed by the following processors:

- companies providing payroll and accounting processing,
- accounting audit firms providing accounting audits within the meaning of specific legislation,
- suppliers providing administration, operation and support of infrastructure systems for Alanata a. s.

Personal data may be provided or disclosed in accordance with applicable legislation:

- by financial authorities,
- by tax authorities,
- by the audit office.

f. Transfer of personal data to a third country or international organisation:

There is no transfer of personal data to third countries or international organisations.

g. The existence of automated decision-making, including profiling:

No automated decision-making or profiling is carried out with personal data.

8. Processing activity: Registry management

a. Purpose of processing personal data:

Performance of activities related to ensuring the management of registry records (registration of incoming and outgoing mail) and ensuring the operation of the registry of Alanata a. s. (ensuring the storage of and access to registry records).

b. Legal basis for the processing of personal data:

The processing of personal data is a legal requirement. The processing of personal data is necessary to comply with the following legal obligations:

- Act No. 395/2002 Coll. on Archives and Registers,
- Decree of the Ministry of the Interior of the Slovak Republic No. 628/2002 Coll., implementing certain provisions of the Act on Archives and Registers.

c. The personal data processed and the sources from which the personal data originate:



Categories of personal data processed:

- sender and recipient of correspondence:
 - title, first name, last name,
 - signature,
 - correspondence address / e-mail address (if the mail was sent electronically),
 - phone number,
 - content of the document,
- the applicant for access to the registry records:
 - name, surname,
 - signature,
 - decommissioning personnel:
 - name, surname,
 - phone contact,
 - e-mail,
 - signature.

The source from which the personal data is obtained:

- the data subject.

d. Retention period for personal data:

Personal data are stored in accordance with the requirements of Act No. 395/2002 Coll. on Archives and Registers. Personal data is stored:

- correspondence: 5 years after its completion and subsequently disposed of,
- postal books: 5 years after the last entry and subsequently disposed of,
- registry diary: 10 years after the last entry and subsequently archived,
- decommissioning proposals, lists and decommissioning protocols: 10 years after handling and subsequently disposed of,
- lists and logs of records transferred to the registry: 10 years after takeover and subsequently disposed of.

The retention periods of registry records depend on their type and content and are kept in accordance with the legislation of the Slovak Republic.

e. Categories of personal data recipients:

Authorised persons of Alanata a. s.

Personal data may be provided or disclosed in accordance with applicable legislation:

- postal and courier companies used to deliver documents,
- the State Archive of the Slovak Republic within the meaning of the obligations of specific legal regulations.



- f. Transfer of personal data to a third country or international organisation:
There is no transfer of personal data to third countries or international organisations.
- g. The existence of automated decision-making, including profiling:
No automated decision-making or profiling is carried out with personal data.

9. Processing activity: Records of accidents at work and accidents other than accidents at work

- a. Purpose of processing personal data:
Ensuring the registration and resolution of occupational accidents and non-occupational accidents within the meaning of Act No. 124/2006 Coll. on Occupational Safety and Health at Work, and on Amendments and Supplements to Certain Acts, as amended.
- b. Legal basis for the processing of personal data:
The processing of personal data is a legal requirement. The processing of personal data is necessary to comply with the following legal obligations:
 - Act No. 124/2006 Coll. on Health and Safety at Work, and on Amendments and Supplements to Certain Acts, as amended,
 - Decree No. 500/2006 Coll. of the Ministry of Labour and Social Affairs of the Slovak Ministry of Labour and Social Affairs of the Slovak Republic, which establishes a model record of a registered work accident, as amended,
 - Act No. 461/2003 Coll. on Social Insurance, as amended,
 - Act No. 311/2001 Coll., the Labour Code as amended,
 - Slovak Government Regulation No. 391/2006 Coll. on Minimum Safety and Health Requirements for the Workplace, as amended.
- c. The personal data processed and the sources from which the personal data originate:
Categories of personal data processed:
 - employees of Alanata a. s.:
 - title, first name, last name,
 - date of birth,
 - status,
 - number of dependent children,
 - function, organizational unit, workplace,
 - nationality,
 - address,
 - birth number,
 - a doctor's report on the seriousness of the work injury,



- social security number,
- the daily assessment base of the injured employee,
- a description of the accident and how it occurred,
- signature,
- third party employees:
 - title, first name, last name,
 - date of birth,
 - description of the injury/how it occurred,
 - signature,
- other persons who caused the accident:
 - title, first name, last name,
 - address,
- inspectors and other persons involved in the investigation and resolution of the work accident:
 - title, first name, last name,
 - date of birth,
 - function,
 - employer,
 - signature.

The source from which the personal data is obtained:

- the data subject,
- another natural person.

d. Retention period for personal data:

Personal data are processed throughout the investigation of occupational and non-occupational accidents and are subsequently placed in pre-archival care in accordance with the requirements of Act No. 395/2002 Coll. on Archives and Registers, and on the Amendment of Certain Acts, as amended, where they are retained for a period of 5 years. They are subsequently archived.

e. Categories of personal data recipients:

Authorised persons of Alanata a. s.

Personal data is processed by the following processors:

- companies providing registration and settlement of occupational and non-occupational accidents.

On the basis of Act No. 124/2006 Coll. on Occupational Safety and Health at Work, as amended, personal data is provided to the following other recipients:

- Labour Inspectorate,
- Social Insurance Office,
- health insurance companies,
- employers of the injured person.



- f. Transfer of personal data to a third country or international organisation:
There is no transfer of personal data to third countries or international organisations.
- g. The existence of automated decision-making, including profiling:
No automated decision-making or profiling is carried out with personal data.

10. Processing activity: Access control to Alanata's premises

- a. Purpose of processing personal data:
Identification of persons at their single and repeated entry to the premises of Alanata a. s., identification of persons moving on these premises and control of access to and within the premises of Alanata a. s.
- b. Legal basis for the processing of personal data:
Personal data of employees of Alanata a. s., third parties and visitors are processed on the basis of the legitimate interest of Alanata a. s. as the controller, namely to ensure controlled access to the premises and thus to ensure the protection of property as well as persons on the premises of the company, which in practice means ensuring the documentation of the time frame of the presence of persons on the premises of Alanata a. s. for the purpose of proving the mechanism of an accident or damage to property or health of persons, proving intentional or unintentional damage to property or health of persons, or any other incident in the field of protection of property and health of persons, and proving liability for damage or injury caused by these events.

The provision of personal data is necessary to allow access to the premises of Alanata a. s. In the event of failure to provide personal data, the data subject will not be granted access to the premises of Alanata a. s.

- c. The personal data processed and the sources from which the personal data originate:

Categories of personal data processed:

- employees of Alanata a. s. and third parties:
 - name, surname,
 - ID (electronic system identifier of the employee),
 - card serial number (card identifier),
 - assigned accesses,
- visits:
 - name, surname,
 - date of visit,



- signature.

The source from which the personal data is obtained:

- the data subject,
- employers of the persons concerned.

d. Retention period for personal data:

Personal data are processed for the entire period of validity of entries onto the premises of Alanata a. s., then they are placed in pre-archival care in accordance with the requirements of Act No. 395/2002 Coll. on Archives and Registers, and on the Amendment of Certain Acts, as amended, where they are kept for 5 years, then they are disposed of.

e. Categories of personal data recipients:

Authorised persons of Alanata a. s.

Personal data is disclosed to suppliers providing administration, operation and support of infrastructure systems for Alanata a. s. and may be provided or disclosed to law enforcement authorities, courts and legal service providers – Attorneys at Law in accordance with applicable legislation.

f. Transfer of personal data to a third country or international organisation:

There is no transfer of personal data to third countries or international organisations.

g. The existence of automated decision-making, including profiling:

No automated decision-making or profiling is carried out with personal data.

11. Processing activity: Customer relationship management

a. Purpose of processing personal data:

Informing about events, acquired competences, partnerships, news, provided products and services, conducting market research in order to develop business activities and promote the marketability of products and services of Alanata a. s., especially in the form of:

- sending newsletters,
- sending written reports, offers and information,
- contacting by phone or email with offers, information and questions,
- organising competitions.

b. Legal basis for the processing of personal data:

The processing of personal data is a legitimate interest of Alanata a. s. to ensure the care of its customers, to improve and develop business activities in the provision of products and services in order to promote their marketability.



In the event of an objection or any other objection to the use of the processed personal data for the aforementioned purposes, the data subjects shall be deleted from the mailing list of Alanata a. s.

At the same time, we also process personal data on the basis of the data subject's consent to address him/her in connection with the provision of information about products and services provided by Alanata a. s., by telephone or electronic mail. Consent shall be granted for a period of 3 years from the year following that in which consent is given. If consent is not given, the data subjects will not be included in the mailing list of Alanata a. s. and thus will not be informed about the products and services of Alanata a. s., about ongoing promotions and news and will not be included in ongoing competitions.

- c. The personal data processed and the sources from which the personal data originate:

Categories of personal data processed:

- customers and potential customers:
 - title, name and surname,
 - employer and employer's address, job title,
 - e-mail,
 - phone number, fax,
 - data related to the use of services and products of Alanata a. s. or to the expressed interest in them.

The source from which the personal data is obtained:

- the data subject.

Personal data is obtained from contracts concluded with the customer, from data filled in on the website of Alanata a. s. and from mutual communication with the customer and the potential customer. At the same time, personal data is also collected from data published on social networks such as LinkedIn and Facebook.

- d. Retention period for personal data:

Records of marketing campaigns and activities are processed for the entire period of their implementation, then they are placed in pre-archival care in accordance with the requirements of Act No. 395/2002 Coll. on Archives and Registers, and on the Amendment of Certain Acts, as amended, and kept for a period of 3 years.

The personal data of customers or potential customers are processed for the entire period of validity of the consent provided by the data subject, or for the



duration of the legitimate interest of Alanata a. s. in the processing of these personal data. The personal data shall be immediately destroyed after the withdrawal of consent by the data subject, upon the manifestation of any disagreement of the data subject with his/her address or if it is established that the personal data processed are no longer up-to-date.

e. Categories of personal data recipients:

Authorised persons of Alanata a. s.

Alanata a. s. processes personal data exclusively for its own purposes. In addition, it uses the Brevo service for processing personal data, which is used to process and send email messages to customers. For more information about Brevo, please visit [brevo.com \(https://www.brevo.com/gdpr/\)](https://www.brevo.com/gdpr/)

Depending on the type of marketing activity, personal data may be processed by the following processors:

- digital agencies,
- call centres,
- suppliers providing administration, operation and support of infrastructure systems for Alanata a. s.

f. Transfer of personal data to a third country or international organisation:

There is no transfer of personal data to third countries or international organisations.

g. The existence of automated decision-making, including profiling:

In order to tailor marketing activities directly to individual groups of current and potential customers and to limit the sending of unaddressed marketing communications and enquiries, Alanata a. s. evaluates information about the data subjects. Profiling is done in terms of the professional sectors (telco sector, financial sector, etc.) in which the customer operates.

12. Processing activity: Procurement of goods and services

a. Purpose of processing personal data:

Procurement of goods and services and follow-up activities related to the fulfilment of contracted obligations.

b. Legal basis for the processing of personal data:

The processing of personal data is a legal requirement. The processing of personal data is necessary for the fulfilment of legal obligations arising from Act No. 513/1991 Coll., the Commercial Code, as amended. At the same time, personal data are also processed on the basis of legitimate interest, namely to ensure the verification of the personal and technical competence of suppliers



of goods and services to fulfil contractual obligations (personal data of employees of the contracting parties).

- c. The personal data processed and the sources from which the personal data originate:

Categories of personal data processed:

- the parties and the supplier's representatives:
 - title, name and surname,
 - contact details (address, e-mail, telephone number),
 - organization,
 - billing information,
 - contractual data,
 - function/position,
 - details of education and professional experience,
 - details of projects carried out,
 - signature,
- employees of the contractor involved in the performance process:
 - name and surname,
 - job position/function,
 - contact details (address, e-mail, telephone number).

The source from which the personal data is obtained:

- the data subject,
- the employer of the data subject.

- d. Retention period for personal data:

Personal data are processed throughout the implementation of the procurement of goods and services and the provision of activities related to the fulfilment of contracted obligations, subsequently they are included in the pre-archival care in accordance with the requirements of Act No. 395/2002 Coll. on Archives and Registers, and on the Amendment of Certain Acts, as amended, and stored for a period of 10 years.

- e. Categories of personal data recipients:

Authorised persons of Alanata a. s.

Personal data may be provided or disclosed in accordance with applicable legislation:

- by financial authorities,
- by tax authorities,
- by the audit office,
- suppliers providing administration, operation and support of infrastructure systems for Alanata a. s.



- f. Transfer of personal data to a third country or international organisation:
There is no transfer of personal data to third countries or international organisations.
- g. The existence of automated decision-making, including profiling:
No automated decision-making or profiling is carried out with personal data.

13. Processing activity: Provision of customer service

- a. Purpose of processing personal data:
Providing goods and services to customers and ensuring activities related to fulfilling contractual obligations (e.g. providing access to client premises/client systems), as well as preparing bids and participating in tenders.
- b. Legal basis for the processing of personal data:
The processing of personal data is a legal requirement. The processing of personal data is also necessary for the fulfilment of the following legal obligations/authorisations:
 - Act No. 343/2015 Coll. on Public Procurement and on Amendments and Supplements to Certain Acts, as amended,
 - Act No. 513/1991 Coll., the Commercial Code as amended,
 - Act No. 40/1964 Coll., the Civil Code, as amended,
 - Act No. 18/2018 Coll. on the Protection of Personal Data, as amended (§ 78, paragraph 3).

At the same time, personal data is also processed on the basis of the company's legitimate interest, namely in connection with the provision of activities related to the fulfilment of customer requirements (e.g. securing access to the customer's premises/systems, etc.), as well as to ensure the demonstration of the personal and technical capability of Alanata a. s. or a business partner to fulfil the customer's requirements.

- c. The personal data processed and the sources from which the personal data originate:
Categories of personal data processed:
 - employees of Alanata a. s. and employees of third parties:
 - title, first name, last name,
 - employer,
 - contact details (e-mail address, telephone contact),
 - date of birth,
 - professional CV,
 - competences (certificates, verifications and certificates of completion of training and examinations),



- data necessary to ensure activities related to the fulfilment of contractual obligations (e.g. access to the customer's premises/systems) for the customer (e.g. ID card number and permanent residence).

The source from which the personal data is obtained:

- the data subject,
 - the employer of the data subject.
- d. Retention period for personal data:
Personal data are processed throughout the entire period of preparation of the offer, during the duration of the tender procedure and during the provision of activities related to the performance of services; subsequently they are included in the pre-archival care in accordance with the requirements of Act No. 395/2002 Coll. on Archives and Registers, and on the Amendment of Certain Acts, as amended, and stored for a period of time:
- tenders and quotations for 3 years and are then disposed of,
 - tender documents for 10 years and are subsequently disposed of,
 - service outputs for 10 years and are subsequently disposed of,
 - supporting documents for activities related to the performance of contractual obligations for the duration of the employee's participation in the performance of contractual obligations for the customer and are then subsequently disposed of.
- e. Categories of personal data recipients:
- authorised persons of Alanata a. s.,
 - business partners and in tenders to potential customers and clients.

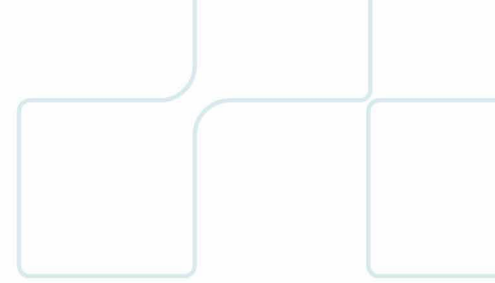
Personal data may be provided or disclosed in accordance with applicable legislation:

- by financial authorities,
- by tax authorities,
- by the audit office.

Personal data is provided in the context of the provision of activities related to the fulfilment of contractual obligations (e.g. providing access to the customer's premises/systems) to the customer.

- f. Transfer of personal data to a third country or international organisation:
There is no transfer of personal data to third countries or international organisations.
- g. The existence of automated decision-making, including profiling:





No automated decision-making or profiling is carried out with personal data.

14. Processing activity: Monitoring of company premises

- a. Purpose of processing personal data:
Monitoring of publicly accessible, internal premises and technologies of Alanata a. s. by a camera system in order to protect property and the safety of persons.
- b. Legal basis for the processing of personal data:
Personal data are processed on the basis of the legitimate interest of Alanata a. s., namely to ensure the documentation of the situation in the monitored premises for the purpose of proving the mechanism of the occurrence of an accident or damage to property or health of persons, proving intentional or unintentional damage to property or health of persons, or any other incident in the field of protection of property and health of persons, and proving liability for damage or injury caused by these events.
- c. The personal data processed and the sources from which the personal data originate:
Categories of personal data processed:
 - persons moving in the monitored premises (e.g. employees, visitors):
 - images and expressions of the personal character of persons.
The source from which the personal data is obtained:
 - the data subject.
- d. Retention period for personal data:
Personal data is kept for a maximum of 30 days from the creation of the record.
- e. Categories of personal data recipients:
 - authorised persons of Alanata a. s.,
 - suppliers providing administration, operation and support of infrastructure systems for Alanata a. s.
 - provided or made available to law enforcement agencies, courts and legal service providers in accordance with applicable legislation – Attorneys at Law.
- f. Transfer of personal data to a third country or international organisation:
There is no transfer of personal data to third countries or international organisations.



- g. The existence of automated decision-making, including profiling:
No automated decision-making or profiling is carried out with personal data.

15. Processing activity: Administration, operation and support of the company's systems and systems operated for other organisations

- a. Purpose of processing personal data:
Providing administration, operation and support for the systems of Alanata a. s. and for systems operated for other organisations, including managing access to these systems, managing change procedures, resolving incidents, monitoring their operation and providing support to their users.
- b. Legal basis for the processing of personal data:
Personal data is processed on the basis of the legitimate interest of Alanata a. s., namely to ensure the protection (confidentiality, availability and integrity) of data processed in the company's systems and systems operated for other organizations.

The provision of personal data is necessary to enable access to the systems. In the event of non-provision of personal data, the data subject will not be allowed to perform the administration, operation and support of the systems.

- c. The personal data processed and the sources from which the personal data originate:

Categories of personal data processed:

- employees of the company:
 - name and surname,
 - workplace,
 - contact details (e-mail, telephone contact),
 - assigned access rights,
 - assigned IP address,
 - allocated technical resources,
- third party employees:
 - name and surname,
 - workplace,
 - contact details (e-mail, telephone contact),
 - organization,
 - assigned access rights,
 - assigned IP address,
 - allocated technical resources.

The source from which the personal data is obtained:

- the data subject,



- the employer of the data subject.

d. Retention period for personal data:

Personal data are processed throughout the performance of the activities of administration, operation and support for the systems; subsequently, they are included in the pre-archival care in accordance with the requirements of Act No. 395/2002 Coll. on Archives and Registers, and on the Amendment of Certain Acts, as amended, and stored for a period of 5 years.

Records of the operation of the systems in electronic form (logs) are kept for 2 years from the creation of the record.

e. Categories of personal data recipients:

Authorised persons of Alanata a. s.,

Personal data is processed by the following processors:

- suppliers providing administration, operation and support of infrastructure and access control systems, incident handling, traffic monitoring and user support.

f. Transfer of personal data to a third country or international organisation:

There is no transfer of personal data to third countries or international organisations.

g. The existence of automated decision-making, including profiling:

No automated decision-making or profiling is carried out with personal data.

16. Processing activity: Screening of persons for access to classified information

a. Purpose of processing personal data:

Carrying out Level I security clearances for acquaintance with classified information of the classification level restricted, evaluation of partial supporting materials for carrying out Level II security clearances and keeping records on the establishment and termination of the designation of persons for acquaintance with classified information.

b. Legal basis for the processing of personal data:

The processing of personal data is a legal requirement. The processing of personal data is necessary to meet the requirements of Act No. 215/2004 Coll. on the Protection of Classified Information, and on Amendments and Supplements to Certain Acts, as amended, and related decrees of the National Security Authority.



- c. The personal data processed and the sources from which the personal data originate:

Categories of personal data processed:

- employees of Alanata a. s.:
- name and surname,
- address,
- date of birth,
- birth number,
- the information contained in the CV,
- the data provided in the application for security clearance,
- the data contained in the extract from the criminal record,
- the data provided in the person's personal questionnaire,
- the data provided in the person's security questionnaire,
- the data contained in the security screening evaluation,
- the information provided in the security clearance consent,
- spouse of the employee of Alanata a. s. / spouse of the employee / children of the employee / persons living in the same household with the employee:
 - name and surname,
 - address,
 - date of birth.

The source from which the personal data is obtained:

- the data subject.

- d. Retention period for personal data:

Personal data are processed for the entire period of validity of security clearances; subsequently, they are placed in pre-archival care in accordance with the requirements of Act No. 395/2002 Coll. on Archives and Registers, and on the Amendment of Certain Acts, as amended, and retained for a period of 3 years (Level I security clearances) or 1 year (Level II security clearances).

- e. Categories of personal data recipients:

Personal data contained in the partial background materials for the performance of Level II security clearances are provided to the National Security Authority on the basis of Act No. 215/2004 Coll. on the Protection of Classified Information.

- f. Transfer of personal data to a third country or international organisation:

There is no transfer of personal data to third countries or international organisations.

- g. The existence of automated decision-making, including profiling:



No automated decision-making or profiling is carried out with personal data.

17. Processing activity: Credibility checks on job applicants and employees

a. Purpose of processing personal data:

Assessing the credibility of RP job applicants* and RP staff at increased risk of corruption. Depending on the data identified, the data is also used to identify potential risks of corruption and to take measures to eliminate the identified risks associated with potential corruption.

*RP – Risk Position.

b. Legal basis for the processing of personal data:

Applicants' personal data is processed on the basis of consent during the selection procedure for the RP.

After the recruitment of an applicant to the RP and an employee to the RP, personal data is processed on the basis of the legitimate interest of Alanata a. s., which is to ensure a high level of ethical, transparent, anti-corruption behaviour of employees, as well as to provide a means of proof to "develop" in the sense of the company's criminal liability.

c. The personal data processed and the sources from which the personal data originate:

Categories of personal data processed:

- job applicants in high-risk positions:
 - title, name and surname
 - the data provided in the "Applicant Credibility Questionnaire"
- applicants in high-risk positions:
 - title, name and surname
 - risk position
 - type and form of activity in another company
 - the data contained in the "Equity Matrix – Assessment of persons in positions at risk of corruption"

The source from which the personal data is obtained:

- job applicant, employees
- web portal www.orsr.sk, www.finstat.sk, www.uvo.gov.sk, rpvs.gov.sk

d. Retention period for personal data:

The personal data of applicants for employment as an RP are stored only for the duration of the selection procedure, after which the data of unsuccessful applicants are deleted without delay. In the case of recruited RP applicants



and RP employees, the data is processed for the entire duration of the employment relationship and is then immediately destroyed.

- e. Categories of personal data recipients:
The personal data of job applicants for an RP are not processed by recipients other than authorised persons of Alanata a. s.
- f. Transfer of personal data to a third country or international organisation:
There is no transfer of personal data to third countries or international organisations.
- g. The existence of automated decision-making, including profiling:
No automated decision-making or profiling is carried out with personal data.

18. Processing activity: Organizing professional and social events

- a. Purpose of processing personal data:
Arranging and documenting (photo/video) the course of professional and social events (hereinafter referred to as "event") in connection with the promotion of the activities of Alanata a. s., representation and strengthening of its reputation among employees, customers and the public.

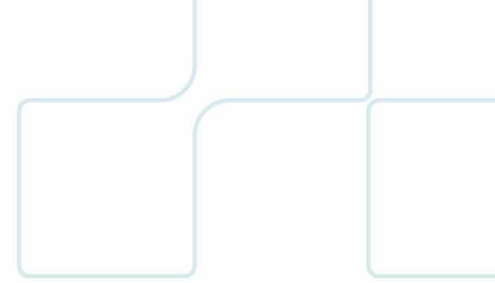
Depending on the nature of the organised event, the data is also used for the purpose of providing insurance for the participants of the respective event.

- b. Legal basis for the processing of personal data:
The processing of personal data is a legitimate interest of Alanata a. s. to support the development of the company's business activities and to preserve historical records of the events held.

At the same time, we process personal data in accordance with the requirements of Act No. 147/2001 Coll. on Advertising, and on Amendments and Supplements to Certain Acts, as amended, and Act No. 351/2011 Coll. on Electronic Communications on the basis of the consent of the data subject to address him/her in connection with sending out invitations to relevant events by e-mail or SMS message, or by contact via telephone. This consent is valid until revoked by the data subject.

In the event of an objection or any indication of opposition to the use of the personal data processed for the aforementioned purposes, the personal data of the data subject will be deleted from the mailing list of Alanata a. s. and thus will not be informed about further events organized by Alanata a. s.





- c. The personal data processed and the sources from which the personal data originate:

Categories of personal data processed:

- customers:
 - name and surname, e-mail address, telephone number,
 - photographic portrait and expressions of a personal nature,
 - name of the employer,
 - job position,
 - feedback on the course of action,
 - information needed for insurance,
- employees:
 - name and surname, e-mail address, telephone number,
 - photographic portrait and expressions of a personal nature,
 - job position,
- family members of the employee:
 - name and surname, age if a child (in order to ensure appropriate refreshments and programme at the event),
 - photographic portrait and expressions of a personal nature.

The source from which the personal data is obtained:

- the data subject,
- a family member of the person concerned.

- d. Retention period for personal data:

Personal data are processed for the duration of a professional or social event, then they are placed in pre-archival care in accordance with the requirements of Act No. 395/2002 Coll. on Archives and Registers, and on the Amendment of Certain Acts, as amended, and retained for a period of 5 years. Historical records of the events held have been kept throughout the existence of Alanata a. s.

The contact personal data of the data subjects are processed for the entire period of validity of the consent provided by the data subject, or the persistence of the legitimate interest of Alanata a. s. in the processing of these personal data.

- e. Categories of personal data recipients:

Authorised persons of Alanata a. s.

Personal data is processed by the following processors:

- advertising agencies and event agencies providing organisation and documentation (photo/video) of the event,
- insurance companies providing insurance for the participants of the respective event,



- suppliers providing administration, operation and support of infrastructure systems for Alanata a. s.,
- f. Transfer of personal data to a third country or international organisation:
There is no transfer of personal data to third countries or international organisations.
- g. The existence of automated decision-making, including profiling:
In order to tailor the focus of professional and social events directly to individual groups of event attendees and to limit the sending of invitations to events in which there is no interest, Alanata a. s. evaluates information on the interest and professional preferences of the persons concerned. Profiling is carried out in terms of the preferences of the data subjects' interest in individual professional articles, topics, technologies, services, interest activities, etc.

19. Processing activity: Handling the rights of data subjects

- a. Purpose of processing personal data:
Handling the asserted rights of data subjects in the area of personal data processing and proving, exercising or defending related legal claims.
- b. Legal basis for the processing of personal data:
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), in conjunction with the legitimate interest of the company in proving, exercising or defending legal claims related to the processing of the asserted rights.
- c. The personal data processed and the sources from which the personal data originate:
Categories of personal data processed:
 - persons exercising data protection rights and their legal representatives
 - common personal data
 - parties
 - common personal dataThe source from which the personal data is obtained:
 - the data subject (the party to the proceedings).
- d. Retention period for personal data:



Personal data are processed for a period of 5 years unless they are no longer necessary for answering questions, exercising the relevant rights in the field of personal data processing or proving, exercising or defending legal claims related to the exercising of the exercised rights.

e. Categories of personal data recipients:

- authorised persons of Alanata a. s.,
- Office for Personal Data Protection of the Slovak Republic,
- Law enforcement authority,
- courts,
- legal service providers,
- the data subjects and their legal representatives,

Personal data is processed by the following processors:

- suppliers providing administration, operation and support of infrastructure and access control systems, incident handling, traffic monitoring and user support.

f. Transfer of personal data to a third country or international organisation:

There is no transfer of personal data to third countries or international organisations.

g. The existence of automated decision-making, including profiling:

No automated decision-making or profiling is carried out with personal data.

