

INGSTEEL, spol. s r.o., Company ID: 17 320 429, registered office: Tomášiková 17, 820 09 Bratislava (hereinafter also referred to as the "Data Controller") in the performance of its duties and acting as an employer shall process personal data that relate to you - employees of our company (or other data subjects as specified below).

The protection of your personal data is of utmost importance to us and we take every effort in order to prevent the processed data from being compromised or breached.

Therefore, when processing your personal data we respect the international standards of personal data protection in compliance with (i) REGULATION (EU) NO. 2016/679 of 27th April 2016, 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 repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter referred to as the "Regulation") and (ii), Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments to Certain Laws (hereinafter referred to as the "Act").

1. **Basic information**

- 1.1 As your employer, we inevitably come into contact with your personal data, which we process for various purposes. We make every effort to ensure that the data is processed in accordance with current legislation and with the principles of processing of personal data arising therefrom. We only process such personal data that is necessary to be processed for the specified purpose. We keep all personal data in a secure manner and only for the necessary time to fulfil the purpose of its processing.
- 1.2 We strive to make sure that access to your personal data is provided only to the persons authorized by our company to process personal data and/or intermediaries who process your personal data on the basis of the instructions given to them and based on applicable law. We have instructed all the above persons of the importance of protecting the processed personal data.
- 1.3 As the Data Controller, we have taken appropriate personnel, organizational and technical measures in order to ensure the maximum level of protection of your personal data, thus minimizing the risk of data breach or misuse. Should a breach in the protection of your personal data occur which would then most likely result in a high risk for the rights and freedoms of natural persons, we shall communicate the above to you without undue delay.
- 1.4 In terms of applicable law, we act as your Data Controller. It is in this capacity that we are **obliged to inform you of the essential facts concerning the processing of your personal data**. In order to fulfil this obligation, we hereby take the liberty to provide you with the **basic information regarding the processing of your personal data and to acquaint you with your rights regarding such processing**.

- 1.5 We receive personal data that we process directly from you as our employees or job seekers interested in being employed by our company. In specific cases we also collect some personal data from other sources, such as publicly available sources (www.linkedin.com), or from your former employers.
- 1.6 In order to fulfil our obligations pursuant to special regulations or the international agreement by which the Slovak Republic is bound, **we are obliged, for designated purposes, to process not only personal data of our employees or job seekers interested in being employed by our company, but also personal data of family members of our employees** (i.e. their spouses, dependent children of employees, parents of dependent children of employees and in this case we obtain personal data of the above persons from you as our employees) **or personal data of our former employees.**

Insofar as these persons act as **Data Subjects** in relation to our company, we process personal data concerning them.

- 1.7 Any questions or comments regarding protection or processing of your personal data should be forwarded to our company using the following identification and contact details of our company:

INGSTEEL, spol. s r.o.

COMPANY ID (IČO): 17 320 429

registered office: Tomášiková 17, 820 09 Bratislava

registered in the Commercial Register of the District Court Bratislava I, section: Sro, Insert No 1220/B

e-mail: gdpr@ingsteel.sk

phone number: 02/4826 9111

- 1.8 At the same time, we would like to inform you that our company has appointed a Data Protection Officer to perform tasks associated with the processing of personal data. Below are contact details for the Data Protection Officer: e-mail address: gdpr@ingsteel.sk
phone number: 02/4826 9111

2. Purposes of the personal data processing and other related information

- 2.1 In order to fulfil our obligations under the Act, we, as the Data Controller **shall process your personal data for several purposes**, in particular for the following:
- (i) **in connection with the fulfilment of our legal obligations or in connection with the exercise of our legal rights under special laws that are related to an employment relationship or similar relationship.** These include, in particular, the following areas of employment law:



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Personnel agenda

- maintain personal agenda of employees in an employment relationship or other similar relationship;
- process agenda related to entering of persons into employment relations or similar relations and termination of employment relations or similar relations, provide education and trainings for the employees;
- process necessary statistical reports;
- provide preventive medical examinations in relation to work and medical fitness for work;
- maintain records of working hours of employees and their attendance;
- maintain records of employees' holidays;
- maintain records of employees' business trips.

Wage agenda

- payment of wages (including processing of payslips or underlying documentation for wages, recapitulation of wages) and processing other financial claims of employees (income compensation, etc.), preparation of payrolls;
- make deductions from wages in accordance with the relevant regulations, processing social security contributions;
- process health insurance contributions, including annual settlement of health insurance;
- process underlying documentation for contributions to supplementary pension savings, preparation of declarations for personal income taxation, annual tax settlement, provide meal vouchers and prepare related survey reports.

Occupational safety and health agenda

- maintain records of employees' industrial accidents,
- maintain records of completed inspections into compliance with the rules of occupational health and safety;
- organize introductory training for employees aimed at compliance with the rules of occupational health and safety;
- maintain records of employee trainings aimed at compliance with the rules of occupational health and safety.

Exercising the rights of Data Subjects under the Regulation and the Act

- process applications of natural persons aimed at exercising their rights as Data Subjects under the Regulation and the Act and process complaints involving suspicions of violation of these regulations.

Others

- investigation and registration of complaints regarding reporting anti-social activities in accordance with Act no. 307/2014 Coll. on Certain Measures Related to The Reporting of Anti-Social Activities and on the Amendment of Certain Acts.

Your personal data is strictly required for these purposes. In this case, the provision of personal data on your part is required by law and if the data was not provided, we would not be able to fulfil our obligations resulting from special regulations for us as an employer.

The categories of personal data processed:

For the above purposes, our company mainly processes your identification data (title, name, family name, address of residence, date and place of birth, birth identification number, handwritten signature), demographic data (age, gender), health insurance data, data on the presence of said person's name in the records of unemployed citizens, data on changed or reduced working capacity, data on important personal obstacles at work, employee's accident at work, data on job classification and date of commencement of work, data on pension award and type of awarded pension, data on the use of maternity leave and parental leave, data on family members (employee's spouse, children of the employees, parents of the employees' children), data on the employment certificate, data on the proof of personal integrity, data on the hours worked, on the employee's attendance and contact details (e-mail, telephone number).

Legal basis for processing of personal data

In the above cases, your personal data is processed **exclusively to the extent necessary to meet the legal obligations defined in special legislation (within the meaning of Art. 6 par. 1 c) of the Regulation and § 13 par. 1 c) of the Act)**. We shall not process personal data other than that directly stated in special regulations, in particular:

- Act No. 311/2001 Coll. of the Labour Code, as amended;
- Act no. 580/2004 Coll. on the Health Insurance amending Act No 95/2002 Coll. on the Insurance and on Amendments to Certain Laws, as amended;
- Act No. 461/2003 Coll. on Social Insurance, as amended,
- Act No. 43/2004 Coll. on Pension Savings and on Amendments to Certain Laws, as amended,
- Act No. 650/2004 Coll. on Supplementary Pension Savings and on Amendments to Certain Acts, as amended,
- Act No. 595/2003 Coll. on Income Tax, as amended,
- Act no. 462/2003 Coll. on the Compensation of Income in the Event of Temporary Incapacity for Work of an Employee and on the Amendment of Certain Acts as amended,
- Act No. 152/1994 Coll. on the Social Fund and on the Amendment of Act No. 286/1992 Coll. on Income Taxes, as amended,
- Act no. 124/2006 Coll. on the Occupational Safety and Health Protection and on Amendments to Certain Acts as amended;
- Act no. 18/2018 Coll. on the Protection of Classified Information and on Amendments to Certain Acts as amended.
- Regulation (EU) No. 2016/679 of 27th April 2016 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 repealing Directive 95/46 / EC (General Data Protection Regulation);
- Act no. 233/1995 Coll. on Bailiffs and Execution Activities (Execution Rules) and on Amendments of Other Acts as amended;
- Act No. 54/2019 Coll. on the Protection of Whistleblowers and on Amendments of certain Acts.



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- (ii) **for the purposes of performing an employment contract** (or an agreement for work performed outside the employment relationship) to **which you are a party. In the case of job seekers interested in being employed by our company,** the **purpose of processing your personal data** within the framework of pre-contractual relations is **to assess the suitability of your experience for the performance of individual job positions to be filled in our company.**

In these cases, the provision of your personal data is **a contractual obligation** and if you did not provide us with the necessary personal data, you would prevent us from concluding an employment contract with you (or an agreement on work performed outside the employment relationship) or you would prevent us from fulfilling our obligations to which we have been bound by concluding an employment contract (or an agreement on work performed outside the employment relationship) with you. Failure to provide personal data to the necessary extent could result in the denial of a contractual relationship between you and our company.

The categories of personal data being processed:

Within the framework of contractual and pre-contractual relations with you, we mainly process your **identification data** (title, name, family name, address of residence, ID card number, date and place of birth, handwritten signature, photograph), **data resulting from an employment or similar contract / agreement** (job classification, the day of commencement of work, information on your bank account for the purpose of paying wages), **contact details** (telephone number, e-mail address, correspondence address), **data concerning your previous work experience and education** (data on your diploma, apprenticeship certificate, documents on professional competence to perform a particular job, proof of personal integrity if necessary for the performance of work, data from previous employers related to your work career with them), **data on medical fitness** (appearing, in particular, in the assessment of the employee's medical fitness) **and other information resulting from your CV** (in addition to the information already provided, a CV usually also contains demographic data such as age, sex, marital status, as well as data related to the job seeker's interests).

We hereby guarantee that we process only those personal data that are necessary for a specified purpose.

Legal basis for processing of personal data

In the above cases, your personal data is processed **for the purposes of performing an agreement to which you are a party as a Data Subject or in order to take action before concluding the agreement on the basis of your request (pursuant to Art. 6 par. 1 b) of the Regulation and § 13 par. 1**

b) of the Act).

- (iii) **for the purpose of making a repeated contact with an unsuccessful job candidate to make them an offer to fill a vacant job position in our company.**

Even though we will not enter into an employment contract with you as an unsuccessful job candidate in our company (an agreement on work performed outside the employment relationship), the personal data provided by you as part of the selection process may, in future, be reused and reprocessed by our company. This is because we can include this personal data in the database of job seekers and, in the future, we can contact you with an offer to fill a suitable vacancy depending on your work experience and preferences.

However, we only process your personal data for this purpose if you give us your consent for this purpose.

Your denial to give us such consent shall not result in any negative consequences for you because the provision of your personal data for this purpose is not a contractual or legal obligation. After completing the selection process, the processing of your data shall be completed.

The categories of personal data processed:

For this purpose (but only subject to your consent), we process your personal data that we have obtained during the selection process. These include mainly your identification data (title, name, family name, address of residence, date and place of birth, handwritten signature, photograph), contact details (telephone number, e-mail address, correspondence address), data concerning your previous work experience and completed education (data on your diploma, apprenticeship certificate, documents on professional competence to perform a particular job, proof of personal integrity if necessary for the performance of work, data from previous employers related to your work career with them), data on medical fitness (appearing, in particular, in the assessment of the employee's medical fitness) and other information resulting from your CV (in addition to the information already provided, a CV usually also contains demographic data such as age, sex, marital status, as well as data related to the job seeker's interests).

Legal basis for processing of personal data

In the above case, your personal data is processed **solely on the basis of your consent for the purpose so defined (within the meaning of Art. 6 par. 1 a) of the Regulation and § 13 par. 1 a) of the Act.** In this case, we will process your personal data only to the extent provided to us by you as the Data Subject. You may withdraw your consent at any time.

(iv) for the purposes of our legitimate interests specified in further details in subparagraphs (a) and (b) below, i.e.:

- a) **in order to assess the suitability of you as a job seeker interested to be employed by our company as well as your work experience, professional knowledge and skills.** In some cases, we assess your suitability for the position to be filled in our company (i) **by requesting references from your previous employers indicated directly by you (especially in the CV provided)** or (ii) **by searching for and verifying information about your work experience from publicly available sources** (e.g. www.linkedin.com).

Providing such personal data is not required by law nor by any agreement, however we have a legitimate interest in receiving such data.

Failure to provide personal data for this purpose could prevent our company from assessing your professional preparedness and experience for the position to be filled and thus prevent us from concluding an employment contract (or an agreement on work performed outside the employment relationship) with you.



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Categories of personal data being processed:

For this purpose, we process in particular your identification data (title, first name, family name, address of residence, photograph, handwritten signature), contact data (phone number, e-mail address, correspondence address), data regarding your previous work experience and your completed education obtained from publicly available sources or from a previous employer (data on previous employers, job description and scope of work duties, duration of employment relationship, references and assessment of the applicant's performance in their previous jobs, assessment of the skills and qualifications of the applicant and other data obtained from publicly available sources related to the job position to be filled (e.g. demographic data).

We hereby guarantee that we process only those personal data that are necessary for a specified purpose. Personal data unrelated to filling a position will be of no interest to us, the search and verification of such data does not fall within the legitimate interest of our company to filling a job position exclusively by qualified and highly skilled professionals.

- b) **for the purposes of exercising our rights in courts or other competent authorities, including the exercise of rights and obligations arising from contractual relations with employees and persons in a similar relationship, for the purpose of recovering registered claims against employees or persons in a similar relationship, and for the purpose of recovering awarded claims in enforcement proceedings.**

Categories of personal data being processed:

For this purpose, we process, in particular, your identification data (title, first name, family name, address of stay, date of birth), contact data (phone number, e-mail address, correspondence address), or data related to the breach of your work obligations and data on the damage caused to our company.

We hereby guarantee that we process only those personal data that are necessary for a specified purpose.

Legal basis for processing of personal data

In the above cases described under a), your personal data shall be processed **for the purpose of our legitimate interests (within the meaning of Art. 6 par. 1 f) of the Regulation and § 13 par. 1 f) of the Act).** Our company has a legitimate interest in verifying your **work experience, expertise and ability,** in order to fill a vacancy exclusively by a candidate who meets pre-defined and necessary conditions for employment in our company.

Also, in the case described under b), your personal data shall be processed **for the purpose of our legitimate interests (within the meaning of Art. 6 par. 1 f) of the Regulation and § 13 par. 1 f) of the Act).** In this case, our company has **a legitimate interest in protecting its rights and legitimate interests in judicial or other proceedings, as well as in protecting its economic interests.**

2.2 Depending on the purpose of processing your personal data and the related legal basis for its processing, we shall keep your personal data for periods of different lengths.

If the purpose of processing your personal data is:

- a) **consent** - we shall keep personal data for the period explicitly stated in the consent, but not beyond the date of the withdrawal of consent (if you give us your consent to notify you in the future of vacancies in our company, we shall store your personal data for a period of **two (2) years** from the end of the selection process, which period shall start on the first day of the calendar year following the year in which the selection procedure was completed;
- b) **fulfilment of legal obligations** - we keep the personal data as follows:
 - deductions from wages, preparation of personal income tax statements, annual tax settlement, documents for wages and other financial claims, occupational health and safety agenda, employee catering, maternity and parental leave, records on the employee incapacity for work, records of arrivals and exits of employees, records of employees' working hours, records on vacations, records of employee accidents **for a period of five (5) years;**
 - employee attendance records **for a period of two (2) years;**
 - preparation of payrolls **for a period of fifty (50) years;**
 - processing health insurance contributions, including annual settlement of health insurance, processing social security contributions, processing underlying documentation for contributions to supplementary pension savings, **for a period of ten (10) years;**
 - processing of applications of natural persons aimed at exercising their rights as Data Subjects under the Regulation and the Act and processing of complaints involving suspicions of violation of these regulations **for a period of seven (7) years;**
- c) **performance of the contract** - we keep personal data for the duration of the contractual relationship, **and pre-contractual relationships** - we keep personal data for the duration of the selection process, i.e. until the contract is concluded or until such time as one party notifies the other that they are no longer interested in concluding the contract;
- d) **legitimate interest of our company** - we shall keep personal data for the duration of the contract or until such time as objections are raised against processing, we shall keep personal data related to litigation and enforcement **for a period of five (5) years;**

Upon expiration of the above deadlines, we shall be authorized to process your personal data only for compatible purposes or for privileged purposes (such as archiving personal data or compiling statistics).

2.3 If you are interested in detailed information about the purposes of processing your personal data, the legal bases for its processing and the duration of its storage, you shall be entitled to view the Records of processing activities of our company, which are available at the HR department of our company.

2.4 The processed personal data shall be received by the companies which are entrusted with the task of archiving documents, accounting, administration of computer and network systems, social insurance company, health insurance company, bailiff, law offices, courts, district offices and other competent administrative authorities.

2.5 The personal data provided shall not be subject to transfer to a third country and shall not be transferred to any international organisation.

- 2.6 We do not carry out any automated decision making or profiling in the processing of personal data
- 2.7 We process your personal data solely for a purpose specified herein or for a purpose compatible with the Act or the Regulation, and these rules apply to each of the above purposes.

2. Rights of the Data Subject

- 3.1 For you, as the Data Subject, the current law in force guarantees you the right to decide on the handling of your personal data to the extent specified therein. **You may exercise the rights specified below:**
- (i) **in person at our company's premises: INGSTEEL, spol. s r.o., Tomášiková 17, 820 09 Bratislava,**
 - (ii) **by phone at: 02/4826 9111**
 - (iii) **electronically by e-mail at gdpr@ingsteel.sk or**
 - (iv) **in writing at: INGSTEEL, spol. s r.o., Tomášiková 17, 820 09 Bratislava,**
- 3.2 **Under the Regulation and the Act, you have the following rights:**

(i) right of access to personal data

As a Data Subject, you have the right to request confirmation from our company as to whether we process your personal data and, if so, to obtain a copy of such data and additional information **resulting from Art. 15 of the Regulation or § 21 of the Act.**

Such additional information shall include the information on the purpose of the processing, the category of personal data being processed, the identification of the recipient or the category of recipient to whom the personal data has been or should be provided, the period for which the personal data will be kept; and if that is not possible, the criteria used to determine such period, the right to request from the Data Controller rectification of the personal data relating to the Data Subject, erasure or restriction of its processing, or the right to object to the processing of personal data, the right to initiate proceedings for the protection of personal data, the source of the personal data if the personal data has not been obtained from the Data Subject and information on the existence of automated individual decision-making, including profiling.

We will provide the requested data to you free of charge. In case of your repeated request to provide personal data, we may charge a reasonable fee based on the administrative costs associated with processing your request.

(ii) right to rectify personal data

In case of change in your personal data, we need to be notified of the change as soon as possible. If the personal data that we are processing about you are inaccurate or are no longer up-to-date, you have the right to request a respective correction from us. You also have the right to supplement the data if the data is incomplete with regard to the purpose of its processing, and you can request supplementation of the data using a supplementary statement.

(iii) right to erase personal data

As a Data Subject, you have the right to request the erasure of your personal data to be completed by us without undue delay, if any of the specific conditions set out below and specified in the applicable law are met, i.e. if:

- Your personal data is no longer necessary for the purpose for which they were collected or otherwise processed;
- you have withdrawn your consent to the processing of personal data and there is no other legal basis for its processing;
- you have raised an objection to the processing of personal data regarding a specific situation associated with the performance of a task carried out in the public interest or in the exercise of powers of official authority, or for the legitimate interest of our company, including profiling and no legitimate grounds override the processing of personal data or if you object to the processing of personal data for direct marketing purposes;
- the personal data is being processed in an unlawful manner;
- the reason for erasure has been caused by the fulfilment of an obligation under a special regulation or an international agreement by which the Slovak Republic is bound;
- personal data has been collected in relation to the offer of information society services.

In the event that your personal data is made publicly available, we will ensure its erasure taking into account the available technological capacities.

At the same time, please note that, despite the exercise of your right to erasure, we will not erase your personal data if they are necessary for providing supporting evidence of, exercise or defence of legal claims.

(iv) right to the restriction on the processing of personal data

As a Data Subject, you have the right to restrict the processing of your personal data if:

- you contest the accuracy of your personal data;
- the processing is unlawful, you have objected to the erasure of personal data and request the restriction of personal data processing instead;
- our company, as a Data Controller is no longer in need of the personal data for the purpose of processing, but you need this data to support your legal claim,
- you have raised an objection to the processing of personal data regarding a specific situation and such processing is associated with the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller, or for our legitimate interests until such time as a verification is made, whether or not the legitimate interest of our company as the Data Controller overrides your interests.

Please note, however, that we will continue to process your data if the grounds for exercising legal claims continue to exist.

(v) **right to the portability of personal data**

As a Data Subject, you have the right to receive, at any time, the personal data concerning you which you have provided to us in a structured, commonly used and machine-readable format. You also have the right to transfer these data to another Data Controller (provided that we process your personal data on the basis of your consent or for the purpose of performing the contract concluded with you and processing is carried out by automated means. If technically possible and based on your request we may transfer your personal information directly to another Data Controller.

This right shall not apply to processing for a task to be carried out in the public interest or in the exercise of the powers of official authority.

(vi) **right to object to processing of personal data**

If we process your personal data for the performance of a task carried out in the public interest or in the exercise of official authority vested in us, or if the processing is carried out on the basis of our legitimate interests or the legitimate interests of a third party, you, as a Data Subject, have the right to object to such processing. Based on your objection, we will restrict the processing of personal data. Unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or reasons for the establishment, exercise or defence of legal claims, we shall cease to process personal data and we shall take care of the erasure thereof.

At the same time, you, as the Data Subject shall have the right to raise objections against the processing of personal data for direct marketing purposes. If you raise objections to such processing, we will no longer process your personal data for this purpose.

You shall also have the right not to be subject to a decision based solely on automated processing of personal data, including profiling, which produces legal effects concerning you or significantly affects you in a similar way. This does not apply if statutory exceptions apply, i.e. if such a decision is (i) necessary for the conclusion of a contract or performance of a contract between you and our company, (ii) carried out on the basis of a special regulation or international agreement by which the Slovak Republic is bound and which also provides for appropriate measures to safeguard the Data Subject's rights and legitimate interests, or if it is (iii) based on your explicit consent.

(vii) **right to initiate proceedings for the protection of personal data**

If you believe that we process your personal data in violation of the Regulation or the Act, you have the right to initiate proceedings for the protection of personal data/file a complaint with the supervisory authority, i.e. the Office for Personal Data Protection of the Slovak Republic.

You can do so using the contact details below:

Úrad na ochranu osobných údajov
Hraničná 12
820 07 Bratislava
Slovenská republika
Phone: +421 /2/ 3231 3214
E-mail: statny.dozor@pdp.gov.sk
Web: www.dataprotection.gov.sk

(vii) **right to withdraw your consent**

As a data subject, you have the right to withdraw your consent to the processing of your personal data at any time. This shall not affect the lawfulness of processing of personal data based on the Data Subject's consent before such withdrawal.

3.3 We hereby declare that in processing of your personal data, we shall adhere to the rules of personal data processing in Art. 5 of the Regulation and in section 6 to § 12 of the Act, in particular that:

- a) we only process personal data lawfully, fairly and in a transparent manner in relation to the Data Subject;
- b) personal data is collected in accordance with the Act and the Regulation for specified, explicit and legitimate purposes;
- c) personal data is collected only for adequate, relevant purposes and is limited to the necessary extent for the purposes for which it is processed;
- d) we have taken measures to ensure that incorrectly processed data shall be erased without delay;
- e) we shall keep personal data in a form that allows identification of Data Subjects no longer than it is necessary to achieve the purpose for which the personal data is processed;
- f) we shall process personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, and for that purpose we have been adopting appropriate technical or organisational measures;
- g) we are aware of our responsibility to comply with the principles of personal data processing and we are able to demonstrate, upon request, this compliance with the principles of personal data processing, to the Office for Personal Data Protection of the Slovak Republic.

3.4 Our aim was to formulate the above information as comprehensibly as possible, so that you have a specific and clear idea of how we handle your personal data and what rights you can use to protect them. If you have any questions regarding the protection of your personal data when processed by our company, we will be happy to answer them. To this end, we will be very happy to receive your suggestions.

In this context you can contact us using the e-mail address: gdpr@ingsteel.sk, or in writing at our company's address.

3.5 At the same time, we reserve the right to change these rules (especially when the need arises to introduce new purposes of processing your personal data and also in the case of changes in the applicable legislation in the field of personal data processing).

In this case, we will notify you of the change in the rules well in advance.