

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"**) is a user of real properties registered at Deed of Title (DT) 6108 in the cadastral area: Ružinov, municipality: Bratislava-Ružinov, district: Bratislava II, real properties at registered at DT 1507 in the cadastral are.: Trstín, municipality: Trstín, district: Trnava and a co-owner and user of real properties registered at DT 4401 in the cadastral area.: Senec, municipality: Senec, district: Senec (hereinafter jointly as the **"Production and office premises"**). Their use and operation are inevitably connected to the use of personal data. As we do our best to safeguard the maximum possible protection of our employees and visitors in Production and office premises, processing of the personal data has become a necessity for us.

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

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 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 Our company inevitably comes into contact with personal data, in particular personal data of employees and visitors of the Production and office premises. However, for the purposes of due operation and security in the Production and office premises, we cannot avoid processing of personal data of other persons (e.g. persons recorded by camera recording system in immediate surroundings of Production and office premises).

1.2 We strive to make sure that the data is processed in accordance with current legislation and with the principles of personal data processing arising therefrom. We only process only such personal data that are necessary to be processed for the specified purpose. We maintain all personal data securely and exclusively for the necessary time to fulfil the purpose of their processing.

1.3 We ensure 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 legislation. We have instructed the above persons of the importance of protecting the processed personal data.

1.4 As the Data Controller, we have taken appropriate personnel, organizational and technical measures with the aim to ensure the maximum level of protection of your personal data in order to minimize the risk of data breach or misuse. Should a breach occur in respect to the protection of personal data which would then, with high probability, result in a high risk to the rights and freedoms of natural persons, we shall then communicate the above to you as the data subject without undue delay.

1.5 In terms of applicable law, we act as your Data Controller when processing personal data. It is in this capacity that we are **obliged to inform you as the data subject of the essential facts concerning the processing of 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.**

1.6 We receive personal data that we process in certain cases directly from you as data subject. For the specified purpose and in specific cases, we also collect some personal data we receive by monitoring of activities of persons in the Production and office premises or in their immediate surroundings.

For such specific purposes, also such persons act, in relation to our company, as **data subjects**, as we process personal data related to 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 Our company has appointed a Data Protection Officer to perform tasks related with the processing of personal data. Data Protection Officer, contact information:

e-mail: gdpr@ingsteel.sk

phone number: 02/4826 9111

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

2.1 In connection to the operation of the Production and office premises and performance of activities related to their operation, **we, as the Data Controller, shall process your personal data for the purposes of monitoring of the Production and office premises and their immediate surroundings, where there are camera recordings made, in order to safeguard security of our employees and our visitors, protect assets of our company, of our employees and assets of our visitors and also in order to prevent criminal activity in the Production and office premises and disclose crime.**

The immediate surrounding of the Production and office premises which is monitored shall be publicly accessible premises such as entrances to the Production and office premises, adjacent parking lots, access roads to the Production and office premises, land plots located in the immediate proximity of the Production and office premises, as well as premises not publicly accessible (warehouse, office and production premises).

In such cases, the provision of personal data is neither legal nor contractual requirement and we process personal data for the purposes of legitimate interests of our company.

Categories of data subjects

For the stated purpose, we process personal data of persons who enter the Production and office premises and/or are present in their immediate surroundings.

Categories of processed personal data:

For the stated purpose, we process visual recording of persons who are present in the Production and office premises and/or in their immediate surroundings and data about the movement (i.e. recorded data about entering, movement in the Production and office premises and leaving the Production and office premises).

Legal basis for processing of personal data

In the above cases, your personal data are processed **for the purposes of our legitimate interests (in the sense of Art. 6(1)(f) of the Regulation and §13(1)(f) of the Act).**

In the present case, our company has its legitimate interest in protection of our assets, assets of our employees and assets of our visitors as well as in maximising their security. We also have the legitimate interest in performing measures that can prevent criminal activity in the Production and office premises and/or in their immediate surroundings and/or assist in disclosing such criminal activity.

When monitoring our premises, we make effort to keep appropriate personnel, organizational and technical measures with the aim of maximizing protection and integrity of processed data.

As persons entering the Production and office premises and/or persons present in their surroundings, you have the right to be notified, in advance, of monitoring of the Production and office premises. The notifications are marked with the pictogram depicting a camera.

Duration of storage of personal data:

For the stated purpose, personal data will be stored for **the period of thirty (30) days** of its receiving.

2.2 In general, our company processes personal data for as long as the purpose of its processing continues to exist. After this period, the personal data shall be immediately destroyed

Particular time periods for storing individual types of personal data are laid down above herein. Upon expiration of the above deadlines, our company shall be authorized to process personal data of data subjects 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 can view the so-called Records of processing activities of our company, which are available at the registered office of our company.

2.4 The processed personal data shall be received by companies which are authorized to provide services of security and protection of assets, administration of computer and network systems, law offices, crime investigation authorities, courts.

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 the purpose specified herein or for a purpose compatible with the Act or the Regulation.

3. Rights of the data subject

3.1 For you, as the Data Subject, the current and valid legislation guarantees you the right to decide on the use of your personal data to the extent specified therein. **You may exercise the rights specified below:**

(i) by phone at: 02/4826 9111

(ii) electronically by e-mail at: gdpr@ingsteel.sk or

(iii) 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 have 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 their 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 have 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 we process about you is inaccurate or is 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 it has been 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 unlawfully,
- the reason for erasure is 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 connection to the offer of information society services

In the event that your personal data is disclosed, we will ensure their erasure, taking into account 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 it is 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 the 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 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 such 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, 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 provide for 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, including profiling, which produces legal effects concerning you or similarly significantly affects you. 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 using the contact details below:

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

(viii) right to withdraw consent

As a data subject, you have the right 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 when processing your personal data, we follow 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 what is necessary in relation to 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 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 adopted 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 It has been our effort 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 it. 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 respect, 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.

INGSTEEL, spol. s r.o.