

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 its business activity acts as a Data Controller that inevitably comes into contact with personal data that it processes.

The protection of personal data is of utmost importance to us and we take every effort in order to prevent the rights of persons, to whom the personal data pertain, from being compromised or breached.

Therefore, when processing 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 Our company inevitably comes into contact with personal data of natural persons, such as personal data:
 - **of our contractual partners** (if they are natural persons) in the performance of the rights and obligations arising from the concluded contract;
 - **their statutory representatives, members of their statutory bodies, contact persons,** if any, **employees** (or persons in an employment relationship with a contractual partner or similar relationship),
 - **members of our statutory body, partners/shareholders of our company, our employees and authorized persons** (in other than an employment relationship).
- 1.2 We process personal data of data subjects 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.
- 1.3 We ensure that access to personal data is provided only to the persons authorized by our company to process personal data and/or intermediaries who process the personal data on the basis of the instructions given to them and based on applicable legislation. We have instructed all the above persons of the importance of protecting the processed personal data.
- 1.4 As a Data Controller, we have taken appropriate personnel, organizational and technical measures with the aim to provide maximum level of protection of 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 most likely 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, when processing the personal data, we act as your Data Controller. 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 In some cases, we obtain personal data that we process directly from the Data Subject (e.g. from a contractual partner if they are a natural person). However, in certain cases, we also process personal data for specified purposes that we have not obtained from the Data Subject. These include, for example, personal data of statutory representatives of our contractual partners, members of their statutory bodies, contact persons, if any, or their employees (or persons in an employment relationship with a contractual partner or similar relationship), in which case we obtain their personal data from the contractual partners or from publicly available registers (register of companies, trade licensing register, register of public sector partners, etc.).

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: ingsteel@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. Contact information of the Data Protection Officer:
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 with our business activities, management of our company and entering into contractual relations, public procurement and commercial tenders, **we, as the Data Controller, shall process personal data for several purposes**, in particular:

- (i) **for the purposes of processing personal data provided by our company to demonstrate adherence to the conditions for the participation of our company in public procurement.**

In these cases, the provision of personal data is **required by law**. In the event that the data subjects did not provide us with the necessary personal data, we would be prevented from due participation in the public procurement process, as we would not be able to submit all the necessary information and documents to the contracting authority for assessment and we would not be able to demonstrate the fulfilment of the required conditions by our company and our capacity and capability to properly and timely deliver (in the event of successful bidding in the public procurement) the procured goods, works and services for the public contracting authority.

Categories of Data Subjects

For the stated purpose, we process the following personal data:

- our statutory representatives, members of our statutory body or persons authorized to act on behalf of our company (as a legal representative or as a contractual representative);
- our employees (or persons who are in an employment relationship or similar relationship with our company), provided that it is necessary to submit documentation to the contracting authority attesting their qualifications or professional competence;
- our contractual partners, if they are natural persons and if they are legal persons, their statutory representatives, members of their statutory bodies, their employees (or persons who are in an employment relationship or similar relationship with our contractual partner), provided that it is necessary to submit documentation to the contracting authority regarding their qualifications or professional competence;

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, handwritten signature), contact data (phone number, e-mail address, correspondence address), data related to previous work experience and qualifications (data in the diploma, certificate of apprenticeship, proof of professional competence to perform the work, certificates or documents confirming the completion of professional examinations).

We always 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 **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. 343/2015 Coll. on Public Procurement and on Amendments to Certain Acts as amended;
- Act No. 513/1991 Coll. Commercial Code, as amended
- Act No. 40/1964 Coll. Civil Code, as amended,
- Act No. 315/2016 Coll. on the Register of Public Sector Partners and on Amendments to Certain Acts as amended.

Period for which personal data shall be stored:

Personal data for the above purposes shall **be stored for a period of five (5) years** from the conclusion of the public procurement contract.

- (ii) **for the purposes of processing personal data provided by our company as part of submitting a draft contract in a public commercial tender.**

In these cases, the provision of personal data is **required by law**. If the Data Subjects failed to provide us with the necessary personal data, they would prevent us from participating properly in a public commercial tender, as we would not be able to submit a proper draft contract to the tender announcer.

Categories of Data Subjects

For the stated purpose, we process the following personal data:

- our statutory representatives, members of our statutory body or persons authorized to act on behalf of our company (as a legal representative or as a contractual representative);
- our employees (or persons who are in an employment relationship or similar relationship with our company) or contact persons acting on behalf of our company if their personal data is required to be included in the draft contract submitted to a public commercial tender.

Categories of personal data being processed

For this purpose, we process, in particular, identification data (title, first name, family name, address of stay, date of birth, handwritten signature), contact data (phone number, e-mail address, correspondence address), data related to previous work experience and qualifications (data in the diploma, certificate of apprenticeship, proof of professional competence to perform a particular work, certificates or documents confirming the completion of professional examinations).

We always 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 **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**. In particular, Act No. 513/1991 Coll. Commercial Code, as amended, represents such a special regulation.

Period for which personal data shall be stored:

Personal data for the above purposes shall **be stored for a period of five (5) years** from the conclusion of a public commercial tender.

- (iii) **for the purposes of processing the personal data of natural persons specified in the contract with the contractual partner of our company in the context of concluding and performing the subject of the contract** (contract for work, purchase contract, lease contract, orders, etc.) in which our company acts as a party, **including the implementation of pre-contractual measures at the request of the Data Subject, as well as keeping records** of statutory representatives and members of statutory bodies of the contractual partners, their employees or other persons authorized to act on behalf of the contractual partners (suppliers, customers) as legal or contractual representatives, for the purpose of proper and effective communication with the other party.

Categories of data subjects

For the stated purpose, we process the following personal data:

- a) contractual partners of our company who are natural persons;
- b) if our contractual partner is a legal entity, their statutory representatives, members of their statutory bodies;
- c) natural persons who are authorized to act on behalf of the contractual partners of our company (as legal representatives or as contractual representatives);

- d) employees of our contractual partner (or persons who are contractual partners in an employment relationship or similar relationship), provided that they are listed in the concluded contract as contact persons.

Categories of personal data being processed

For this purpose, we process, in particular, the identification data (title, first name, family name, address of stay, handwritten signature) and contact data (phone number, e-mail address, correspondence address).

We always process only those personal data that are necessary for a specified purpose.

Legal basis for processing of personal data

Detailed explanation of a) above:

We process the personal data of the contractual partner (natural person) **in order to identify it as a party to the contract and in order to perform the contract in which the Data Subject acts as a party, or in order to take measures before concluding the contract at the request of the contractual partner (pursuant to Art. 6 par. 1 b) of the Regulation and § 13 par. 1 b) of the Act)**. We process the personal data of our contractual partners (if they are natural persons) as part of the fulfilment of rights and obligations arising from the concluded contract and for the purpose of providing the service or delivery of the ordered goods or service, in particular for the purpose of clear identification, administration, invoicing and ensuring pre-contractual negotiations with potential contractual partners.

In these cases, the provision of your personal data is **a contractual obligation** and if you failed to provide us with the necessary personal data, it would make it impossible for us to conclude a contract with the contractual partner or it would prevent us from fulfilling our obligations to which we have been bound by entering into such contract. Failure to provide personal data to the necessary extent could then result in the denial of a contractual relationship between our company and the contractual partner.

Detailed explanation of (b) and (c) above:

In in the case of the processing of personal data of natural persons who, in concluding the contract, acted in the name of or on behalf of the contractual partner (statutory representative, member of the statutory body of the contractual partner, legal or contractual representative of the contractual partner), the processing of their personal data (most often their name, family name, position and handwritten signature) is **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. 513/1991 Coll. Commercial Code, as amended
- Act No. 40/1964 Coll. Civil Code, as amended.

In these cases, the provision of personal data is **required by law** and if the data subject does not provide us with the necessary personal data, it would prevent us from properly concluding a contract with our contractual partner or entering into a contractual relationship with the contractual partner.

Detailed explanation of (d) above:

When processing personal data of natural persons who in the process of concluding contract act as a contact person of the contractual partner, the processing of personal data is necessary for legitimate interests of our company (**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 being able to process the personal data of a person designated and authorized by the contractual partner to provide the necessary actions in connection with the contract being concluded (in particular, for efficient and effective communication with our company regarding the contract being concluded and/or concluded contract).

Providing personal data in this case is not a legal or contractual obligation, although failure to provide it would prevent us from effectively performing the contract with the contractual partner.

Period for which personal data shall be stored:

We store personal data for the above purposes **for four (4) years from the end of the contractual relationship** established by the contract, or **for the duration of pre-contractual relations**, if we process personal data due to the contract performance, or **for the duration of the legitimate interest** pursued by our company, if the processing of personal data is necessary for this purpose.

- (iv) **for the purposes of keeping and executing the agenda of a company (processing of personal data in the preparation of underlying documentation to implement changes in the company; such as preparation of affidavits of partners/shareholders, members of the supervisory board, specimen signatures, preparing proposals for the registration of changes in the company in the relevant register, and also the preparation of powers of attorney, credentials and other documents which normally form part of management agenda within a company.**

In these cases, the provision of personal data is **required by law**. If the Data Subjects did not provide us with the necessary personal data, they would prevent us from properly fulfilling the obligations imposed on us by special regulations, or they would prevent us from performing the actions necessary for the proper operation of the company.

Categories of data subjects

For the stated purpose, we process the following personal data:

- statutory representative of our company or members of the statutory body;
- partners/shareholders of our company, members of the Supervisory Board,
- employees and other persons who are in an employment or similar relationship with our company.

Categories of personal data being processed

For this purpose, we process, in particular, the identification data (title, first name, family name, address of stay, date and place of birth, handwritten signature), contact data (correspondence address, phone number), job position within our company

We always process only those personal data that are required for a specified purpose.

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).**

Such special regulations shall include, in particular:

- Act No. 513/1991 Coll. Commercial Code, as amended
- Act no. 530/2003 Coll. on Public Procurement and on Amendments to Certain Acts as amended;
- Act No. 455/1991 Coll. on Trade Licensing (Trade Licensing Act), as amended;
- Act No. 40/1964 Coll. Civil Code, as amended,
- Act No. 315/2016 Coll. on the Register of Public Sector Partners and on Amendments to Certain Acts as amended.

Period for which personal data shall be stored:

Personal data for the above purposes will **be stored for ten (10) years** following the year in which the documentation including the personal data to be stored was prepared.

- (v) **for the purposes of keeping and providing the economic and accounting agenda of our company (in particular the processing of personal data of natural persons who are involved in payment transactions with our company, processing of orders, invoicing, cash office, keeping company accounts, processing of accounting documents, i.e. processing of accounting data and reporting, providing accounting information.**

In these cases, the provision of personal data is **required by law**. If the Data Subjects did not provide us with the necessary personal data, they would prevent us from properly fulfilling the obligations imposed on us by special regulations, or they would prevent us from performing the actions necessary for the proper operation of the company.

Categories of Data Subjects

For the stated purpose, we process the following personal data:

- our employees or other persons authorized to act on behalf of our company (legal or contractual representatives), statutory representatives of our company or members of the statutory body of our company;
- contractual partners (suppliers, customers) who are natural persons and, in case of legal persons, their statutory representatives or members of the statutory body, their employees or other persons authorized to act on their behalf (legal or contractual representatives).
-

The categories of personal data being processed:

For this purpose, we process, in particular, **the identification data** (title, first name, family name, address of stay, date of birth, handwritten signature), **contact data** (phone number, e-mail address, correspondence address, fax number), **data on natural person's bank account.**

We always 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 **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).**

Such special regulations shall include, in particular:

- Act No. 513/1991 Coll. Commercial Code, as amended
- Act No. 431/2002 Coll. on Accounting, as amended;
- Act No. 595/2003 Coll. on Income Tax, as amended,

Period for which personal data shall be stored:

We shall store the personal data for the above purposes **for a period of ten (10) years** following the year to which the documentation including the personal data relate.

- (vi) **for the purposes of registering and 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.**

In these cases, the provision of personal data is **required by law**. If the Data Subjects do not provide us with the necessary personal data, they would prevent us from properly fulfilling the obligations imposed on us by special regulations, or they would prevent us from properly assessing, process and respond to your motion or your application to exercise rights granted to you by the legislation in the field of personal data protection.

Categories of data subjects

For the specified purpose we process personal data of natural persons – Data Subjects – who approach us as the Data Controller with a request aimed at exercising their rights as Data Subjects pursuant to the Regulation and the Act.

Categories of personal data being processed:

For this purpose, we process, in particular, the identification data (title, first name, family name, address of stay, handwritten signature), contact data (phone number, e-mail address, correspondence address), and additional personal data provided by the Data Subject in their application.

We always process only those personal data that are necessary for a specified purpose.

Legal basis for processing of personal data

In the above cases, the 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).**

Such special regulations shall include, in particular:

- Act no. 18/2018 Coll. on the Protection of Personal Data 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).

Period for which personal data shall be stored:

We shall keep the personal data related to the processing of applications of Data Subjects aimed at exercising their rights as Data Subjects under the Regulation and the Act **for a period of seven (7) years** after processing the application.

- (vii) **for the purposes of providing supporting evidence, exercising or defending our rights and legal claims in courts or other competent authorities, including the exercise of rights and obligations arising from contractual relations with contractual partners and requesting damage compensation, for the purpose of recovering registered claims against contractual partners, and for the purpose of recovering awarded claims in enforcement proceedings**

In these cases, the provision of personal data is not required by law or by contract.

Failure to provide such personal data would prevent our company from proper exercising of its rights and claims.

Categories of Data Subjects

For this purpose, we process personal data of natural persons who act as a contractual partner of our company and who are in breach of their obligations under a contract or towards whom we register a claim or other claims that need to be brought before a court or other competent authority.

The categories of personal data processed:

For this purpose, we process, in particular, your identification data (title, first name, family name, address of stay, handwritten signature), 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 or data on existing claim of 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 this case, the 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, proving and exercising its rights and legitimate interests in judicial or other proceedings, as well as in protecting its economic interests.**

Period for which personal data shall be stored:

We use and store personal data processed for the reason of our legitimate interests in exercising, proving and defending our rights, interests and claims, **for a period of five (5) years** after the end of our business relationship with the contractual partner (or after the termination of the relationship with an employee, statutory body, authorized or contact person with the contractual partner or potential contractual partner of our company), **unless the stated legitimate interest of our company continues to apply** and in any case until such time as an objection is raised against the processing of personal data where the rights and interests of the Data Subject override our legitimate interests.

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

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.

Specific periods of keeping individual personal data are set out above in this document. Upon the expiry thereof our company is entitled to process personal data of the Data Subject only for compatible purposes or for special purposes such as archiving or 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, 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.

3. 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 of personal data, the category of personal data being processed, 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 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 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 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 there are no overriding legitimate grounds for processing 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 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 no longer needs personal data for the purpose of processing personal data, but you need it for the purpose of making a 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 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 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

(viii) right to withdraw 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, 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 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 personal data and what rights you can use to protect it. If you have any questions regarding the protection of 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 in this case, we will notify you of the change in the rules well in advance.

INGSTEEL, spol. s r.o.