# PRIVACY POLICY PERSONAL DATA PROCESSING POLICY (BUSINESS PARTNERS, CONTACT PERSONS)

#### INTRODUCTORY INFORMATION

Dear business partners,

this policy is intended to inform you how the company **BALU group s. r. o.,** with its registered seat at Považské Podhradie 390, Považská Bystrica 017 04, Company ID No. (IČO): 46 062 823, registered with the Commercial Register of the District Court Trenčín, Section: Sro, Insert No.: 24138/R (hereinafter jointly referred to as the "**Company**") collects, processes, uses and transmits your Personal Data (hereinafter jointly referred to as the "Personal Data Processing").

Personal Data shall mean information relating to a certain person, who can be identified on the basis of this information, or in connection with other information.

The most common examples of Personal Data that the Company processes as part of its day-to-day business activities are identification data (especially name and surname, job position) and contact details (in particular company e-mail address and company telephone number) of the business partners (natural persons), or representatives, employees, co-workers, or members of the statutory bodies of the business partners (legal persons) (hereinafter jointly referred to as the "Business Partners").

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## **Article 1: Who Is the Controller of Your Personal Data?**

The Personal Data Controller is the Company BALU group s. r. o., with its registered seat at Považské Podhradie 390, Považská Bystrica 017 04, Company ID No. (IČO): 46 062 823, registered with the Commercial Register of the District Court Trenčín, Section: Sro, Insert No.: 24138/R, which determined how and for what purpose the Personal Data should be processed.

## Article 2: In What Scope and for What Purpose Do We Process Your Personal Data?

The table below shows in what scope, for what purpose and on what legal basis the Company processes Personal Data on the Business Partners:

Personal Data (Categories and Examples)	Purpose of Processing	Legal Basis for Processing
Basic identification	Negotiation, conclusion	<ul> <li>Conclusion and</li> </ul>
and contact	and performance of a	performance of a
details of the	contract.	contract,

<u>business</u>	
partner:	

name and surname	Legitimate interest of the
function, company	Company in ensuring
• e-mail, telephone number,	communication with the
	Business Partners.

#### Article 3: From What Sources Do We Obtain Your Personal Data?

The Company obtains Personal Data, which it subsequently processes, directly from the Business Partners or from publicly available sources (e.g. the Commercial Register).

## Article 4: Do We Share Your Personal Data with Other Persons?

## a) Disclosing Personal Data to Third Parties

Under certain circumstances, the Company is obliged to share Personal Data of the Business Partners with third parties in accordance with the legislation on Personal Data Protection.

Such third parties namely include:

- administrative and similar bodies (tax offices, financial authorities and others),
- financial institutions (banks, insurance companies),
- police, prosecution, courts
- the Company's external advisors (accounting, tax and legal advisors, auditors),

## Article 5: Do We Transmit Personal Data to Countries Outside the EU/EEA?

Personal Data of the Business Partners and their employees, co-workers, members of the statutory bodies of the Business Partners are not transmitted to countries outside the EU and the EEA. There is no transfer of Personal Data to a third country or an international organisation.

# **Article 6: How Are Your Personal Data Secured?**

The Company uses modern IT security systems to ensure the confidentiality, integrity and availability of Personal Data of the Business Partners. The Company maintains appropriate security technical and organisational measures against any unlawful or unauthorised processing of Personal Data and against accidental loss of or damage to Personal Data. Access to Personal Data of the Business Partners (contact persons) is granted only to persons, who need them in connection with the performance of their job duties, while these persons are bound by a legal or contractual obligation of confidentiality.

## **Article 7: How Long Will We Process/Store Your Personal Data?**

The Company only stores Personal Data of the Business Partners (contact persons) for the period, during which they are needed for the purpose for which they were collected, or for the protection of the legitimate interests of the Company or during the period, for which the consent to their processing was granted.

## Article 8: What are your rights in relation to the processing of your Personal Data

The legislation governing the protection of Personal Data, in particular the EU General Data Protection Regulation (GDPR), lists in particular the following rights of the data subjects:

- the right to clear, transparent and comprehensible information about how the Company uses Personal Data and what rights the data subject has in relation to the Personal Data Processing;
- the right to withdraw the given consent to the Personal Data Processing at any time, free of charge, by post or e-mail to the address below,
- **the right of access** to Personal Data and to be provided with other information related to their processing by the Company or external processors,
- **the right to rectify** incorrect and to supplement incomplete Personal Data;
- **the right to delete** Personal Data, in particular where (i) they are no longer needed for further processing; (Ii) consent to their processing has been withdrawn; (Iii) the data subject has justifiably objected to their processing; (Iv) they have been processed unlawfully; or (v) must be deleted by law;
- the right to limit the Personal Data Processing if (i) the data subject has challenged the correctness of the Personal Data until their accuracy is verified; (Ii) the processing is unlawful; (iii) the Company no longer needs them, but the data subject needs the Personal Data for the purpose of asserting his/her legal claims; or (iv) the data subject has objected to their processing until the Company verifies whether the legitimate interests of the Company outweigh the interests of the data subject;
- **the right to object** to the Personal Data Processing if they are processed for the purposes of the Company's legitimate interests or for the purposes of the Company's direct marketing;
- **the right of transmission**, i.e. the right to obtain one's Personal Data and transfer them to another Controller, provided that the legal conditions are met;
- **the right to file a complaint** with the Office for Personal Data Protection, with its registered seat at Hraničná 4826/12, 820 07 Bratislava, Slovak Republic; https://dataprotection.gov.sk/uoou/, if the data subject believes that the Company is in breach of its obligations under the Personal Data Protection legislation.

# **Article 9: Questions and Contacts**

If you are interested in detailed information about your rights in the field of Personal Data Protection, including the right of access and to rectify incorrect data, or any other question or complaint regarding their processing, please contact us by post, personally, by phone or by e-mail.

## **Controller:**

BALU group s. r. o., with its registered seat at Považské Podhradie 390, Považská Bystrica 017 04, e-mail: balu@balugroup.sk phone: +421 917 977 552

#### **Article 10: Changes to the Personal Data Processing Policy**

The Company may decide to change or update this Policy. The current wording of the Policy can always be found on the Company's website: www.balugroup.sk in the GDPR section" *PersonalData Processing Policy*".