

Information on personal data protection

developed in accordance with the Regulation of the European Parliament and the Council (EU) 2016/679 on the protection of natural persons in the processing of personal data and on the free movement of such data (hereinafter referred to as “**GDPR**”) and Act no. 18/2018 Coll. on the protection of personal data (hereinafter referred to as the “**Act on the Protection of Personal Data**”)

1. Introductory provisions

The company EXREAL s.r.o., s.r.o., with headquarters Matejkova 3272/13 Bratislava - mestská časť Karlova Ves 841 05, ID: 35 790 601 (hereinafter referred to as “**EXREAL s.r.o.**” or “**our company**”) respects the privacy of all data subjects with whom it is in contact, regardless of whether it processes personal data itself or through third parties. It is extremely important for our company every data subject understands what personal data we process about them, why we do it and what rights they have. We may process personal data of data subjects in different ways and in different situations depending on the type of data subject. In this document below you will find general information such as:

- **identification and contact data of our company** (section 1 of this document),
- **your rights in connection with the processing of your personal data** (section 2 of this document),
- **information about automated individual decision-making, including profiling** (section 3 of this document) ;

while More information on the processing of personal data in your specific case can be found in section 4 of this document, depending on whether you are:

- **visitor to our website,** (section 4.1. of this document)
- **client or interested in the product,** (section 4.2. of this document)
- **job applicant,** (section 4.3. of this document)
- **supplier (or business partner)** (section 4.4. of this document)

At the same time, we would like to ask you, on behalf of the company EXREAL s.r.o. that you always provide us with up-to-date and correct personal data, which will then be processed by our company. In the event that there is a change in personal data, we also ask you to notify us of this fact without undue delay.

To protect your personal data from unauthorized persons and from illegal processing, unforeseen loss, destruction and damage both online and offline, we use physical, electronic

and organizational measures to prevent such situations from occurring in accordance with our internal rules in the field of personal data protection.

2. Company identification and contact details of EXREAL s.r.o.

The identification and contact details of the company EXREAL s.r.o. are:

Business name:	EXREAL s.r.o.
Headquarters:	Matejkova 3272/13 Bratislava - mestská časť Karlova Ves 841 05
ID number:	35 790 601
Registered in:	Commercial register of the City Court Bratislava III, section:
Sro file no.:	21963/B
mailing address:	[*]
email:	[*]
phone:	[*]

EXREAL s.r.o. does not have a DPO (our company is not obliged to appoint a DPO in accordance with the GDPR and the Act on the Protection of Personal Data).

3. Rights of the data subject

If our company processes your personal data, you, as a data subject, have the following rights:

- The right to withdraw consent - in cases where we process your personal data based on your consent, you have the right to revoke this consent at any time. You can revoke consent electronically, at the address provided in section 1 of this document, by written notice of withdrawal of consent (or by other appropriate means). Withdrawal of consent does not affect the legality of the processing of personal data that we processed about you on its basis.
- The right of access - you have the right to be provided with a copy of the personal data we hold about you, as well as information about how we use your personal data. In most cases, your personal data will be provided to you in electronic form, if this is technically possible.
- The right to rectification - we take reasonable steps to ensure the accuracy, completeness and timeliness of the information we hold about you. If you believe that

the data we hold about you is inaccurate, incomplete or out of date, please do not hesitate to ask us to correct, update or supplement this information.

- The right to erasure (the right to be forgotten) - you have the right to ask us to erase your personal data, for example if the personal data we have collected about you is no longer necessary to fulfill the original purpose of the processing. However, your right must be assessed in light of all relevant circumstances. For example, we may have to comply with certain legal obligations that prevent us from complying with your request.
- The right to restriction of processing - in certain circumstances you have the right to ask us to stop using your personal data. For example, when you believe that the personal data we hold about you may be inaccurate, or when you believe we no longer need to use your personal data.
- The right to data portability - in certain circumstances, you have the right to ask us to transfer the personal data you have provided to us to another third party of your choice. However, the right to portability only applies to personal data that we have obtained from you on the basis of consent or on the basis of a contract to which you are a party.
- The right to object - you have the right to object to the processing of your data based on our legitimate interests. If we do not have a compelling legitimate reason to process your data and you file an objection, we will not process your personal data further.
- The right to submit a proposal to initiate proceedings on the protection of personal data - if you believe that your personal data is being processed unfairly or illegally, you can file a complaint with the supervisory authority, which is the Personal Data Protection Office of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27; telephone number: +421 /2/ 3231 3214; e-mail: statny.dozor@pdp.gov.sk, website: <https://dataprotection.gov.sk>. In case of submission of the proposal in electronic form, it is necessary that it fulfills the requirements according to § 19 par. 1 of Act no. 71/1967 Coll. on administrative procedure (administrative order).

4. Automated decision-making and profiling

Your personal data **will not be used** for automated individual decision-making, including profiling.

5. Information on the processing of personal data by data subjects

The provisions of the section 4 do not apply to data subjects who have been specifically instructed in writing by the EXREAL s.r.o. in accordance with § 19 and 20 of the Act on the Protection of Personal Data in the event that the data subject has personally signed such instructions, from the moment of signing such instructions.

5.1. A visitor of the website of the company EXREAL s.r.o.

EXREAL s.r.o. is the operator of the website located at www.priletisku.sk (hereinafter referred to as “**website**”).

In connection with the processing of cookies through the website, EXREAL s.r.o. has prepared a special document that contains all the necessary information regarding the processed cookies and which is accessible directly on the website.

5.2. Client (or interested in the product)

The product of the company EXREAL s.r.o. means any service provided by the company EXREAL s.r.o. and/or any goods sold by the company EXREAL s.r.o..

5.2.1. The purpose of personal data processing

In order to conclude and fulfill the contract with you or the company you represent, it is necessary to process your personal data. We may also process personal data about visitors to our website (section 4.1 of this document) or physical locations depending on how you have chosen to communicate with our company regarding your interest in our company's product(s).

The source of personal data. Contact personal data is provided to our company by a person interested in a product, either voluntarily, or our company obtains them from publicly accessible sources (registers and databases of people interested in products similar to our company's products).

5.2.2. Legal basis

We process your personal data only if we have a legal basis to do so.

- This means that data processing must be necessary for the performance of a contract in which you or the company you represent are a party to the contract or to be able to take steps upon request even before the conclusion of the contract (the legal basis is therefore the contract, including pre-contractual relations).

- In accordance with our legitimate interest, we may also use your data to properly conduct our company's business, to provide information about our products, prospects, analysis that may be in your best interest, or to perform necessary or required tasks resulting in from the business relationship that you represent (the legal basis is therefore the legitimate interest of our company).
- We have a legal obligation to provide your personal data during checks by authorized institutions and when preventing, tracking and proving fraud and other crimes (the legal basis is therefore also the law in selected cases).

5.2.3. Scope of personal data processing

EXREAL s.r.o. processes "ordinary personal data" to the extent necessary to fulfil the purposes specified in point 4.2.1 of this document, in particular to the following extent:

- name, surname, title
- address of permanent residence, correspondence address
- date of birth (if necessary for the purpose of unambiguous and unmistakable identification of the client, especially in the case of a written contract)
- ID number
- VAT number
- TAX number
- phone number, e-mail
- account numbers (for sending any contractual payments)

5.2.4. Categories of beneficiaries

Personal data is processed directly by our company, in written and electronic form. Personal data can be made available to entities authorized according to special regulations, which are mainly: law enforcement authorities, courts, enforcement offices, etc.

Some activities for our company are performed by subcontractors. For the purpose of performing these activities, it is required that such subcontractor be provided with your personal data to the extent necessary for the purpose of fulfilling the tasks of the subcontractor. Such external subcontractors are mainly external accounting, tax and other consulting companies, companies operating web hosting and server and/or data storage management, legal representatives, etc. Specifically, companies and

activities may be subject to changes, according to the current needs of EXREAL s.r.o..

5.2.5. Transfer of personal data

The controller can process some personal data (for example, name, surname and e-mail) also through electronic systems and data storages operated by persons (intermediaries) outside the European Union. The controller always checks whether they ensure the highest possible protection of personal data in accordance with the relevant legislation (i.e. they are part of the European Commission's adequacy decision, for example part of the EU-US Privacy Shield program if they are located in the USA, etc.).

5.2.6. Time of personal data processing

Our company stores your data for as long as is necessary to fulfill the purpose of processing according to special regulations and the purpose for which it was obtained (see point 4.2.1 above), if we have a legitimate interest in keeping it, for example until the termination of the contractual relationship. After the termination of the contractual relationship and settlement of all obligations resulting from or related to such contractual relationship, our company stores your personal data for the necessary period, namely for the period required by the relevant legal regulations. Unless such a period is stipulated by law, our company is entitled to store your personal data for a period of at least two years from the date of termination of the contractual relationship. In the event of a legal dispute with you (as a data subject), at least two years from the date of legal termination of the legal dispute.

5.3. Jobseeker

5.3.1. The purpose of personal data processing

EXREAL s.r.o. will process your data for the following purposes:

- Recruitment of new employees. We process your data to determine whether you are a qualified candidate for the position you are applying for.
- Dispute resolution. Our company may process personal data for the purpose of resolving disputes, complaints or legal processes.
- Compliance with the law. Our company may need to process your personal data to comply with the law or to comply with a court order.

The source of personal data. Personal data is provided to our company by a jobseeker voluntarily, or our company obtains it from publicly accessible sources (registers and databases of applicants on the labour market).

5.3.2. Legal basis

Our company processes your personal data because the processing is necessary for the purposes of the legitimate interest of our company. Our legitimate interest in this case is to obtain qualified candidates. In some cases, we will process your personal data for the purpose of fulfilling legal obligations (i.e. on a legitimate legal basis) or we process them on the legal basis of pre-contractual relations (while in the case of concluding an employment contract, you as an employee of our company will be specifically instructed in writing in connection with the protection of personal data).

5.3.3. Scope of personal data processing

In the case of your interest in employment in our company, we obtain the following information from you in particular:

- Contact data: for example, your name, surname, title, address of permanent residence, address of temporary residence, private email address, telephone number.
- Information from your CV: such as your previous jobs, education, skills, language skills and any other information you choose to include in your CV.
- Cover letter: any information you choose to include in your cover letter.
- Eligibility for work: you may need to demonstrate that you are legally eligible to work for our company, e.g. education, language skills, medical fitness for selected types of positions, etc.
- References: we may also ask for references from people who have worked with you in the past. Generally, we will only contact these individuals if you provide us with their names and contact information.

5.3.4. Categories of beneficiaries

Personal data is processed directly by our company, in written and electronic form. Our company may share your data with third parties under the following circumstances:

- If we wish to obtain information from third parties (as described above), we will provide them with your first and last name and any other information necessary for them to provide us with relevant information about you.

- If required by law or court order, we may share your personal data, for example, with law enforcement authorities or other authorized authorities of the Slovak Republic.
- In the case of legitimate interest of our company, we can also provide your personal data to companies with economic or personnel connections with our company.

Certain activities for our company are carried out by subcontractors. For the purpose of performing these activities, it is required that the personal data of the data subject is provided to such a subcontractor to the extent necessary for the purpose of fulfilling the tasks of the subcontractor. Such external subcontractors are mainly external personnel agencies, accounting, tax and other consulting companies, companies operating data storage and server management. Specifically, companies and activities may be subject to changes according to the current needs of our company.

5.3.5. Transfer of personal data

The controller can process some personal data (for example, name, surname and e-mail) also through electronic systems and data storages operated by persons (intermediaries) outside the European Union. The controller always checks whether they ensure the highest possible protection of personal data in accordance with the relevant legislation (i.e. they are part of the European Commission's adequacy decision, for example part of the EU-US Privacy Shield program if they are located in the USA, etc.).

5.3.6. Time of personal data processing

We retain your personal data for a limited period of time and this data will be deleted when it is no longer necessary for processing purposes. This means that we will keep your data for the duration of the selection procedure and we will always delete them by the last day of the year following the year in which we came into contact with your personal data. The reason for this storage is to protect our interests in case of dispute resolution. If we select you to fill a given job position, we will keep your personal data in a personal file in accordance with our internal basic principles of personal data processing (in the form of a directive). We may also process your personal data for a longer period after the end of the selection process, in the event that there is a legal dispute or if you give us your consent to store your personal data for a longer period of time.

5.4. Supplier (or business partner)

5.4.1. The purpose of personal data processing

The purpose of personal data processing is (i) tendering for the position of a supplier of services and/or goods to our company EXREAL s.r.o. or a cooperating person of the company EXREAL s.r.o., regardless of whether it is a long-term supplier-customer relationship or a one-time supply (hereinafter referred to as „**supplier** ") and the subsequent records of suppliers and management of the pre-contractual/contractual relationship between the supplier and our company, (ii) the performance of our company's business activities as well as (iii) for the protection of our company's property and (iv) possibly other purposes for which the supplier granted its consent.

The source of personal data. Personal data is provided to our company by the supplier himself voluntarily, or our company obtains them from publicly accessible sources (registers and databases).

5.4.2. Legal basis

The legal basis for processing personal data is:

- the exercise of rights and the fulfillment of contractual obligations arising mainly from the contract between EXREAL s.r.o. and the supplier and related documentation, including pre-contractual relations (regardless of whether such a contract is concluded verbally or in writing, including in the form of an order) and
- in certain cases, also the legitimate interest of our company in the proper performance of its business activity.

5.4.3. Scope of personal data processing

EXREAL s.r.o. processes "ordinary personal data" to the extent necessary to fulfil the purposes specified in point 4.2.1 of this document, in particular to the following extent:

- name, surname, title
- ID number
- VAT number
- TAX number
- place of business, seat or establishment (which may be the same as residence)
- phone number, e-mail

- account numbers (for sending any contractual payments)
- signature

5.4.4. Categories of beneficiaries

Personal data is processed directly by our company, in written and electronic form. Personal data can be made available to entities authorized according to special regulations, which are mainly: law enforcement authorities, courts, enforcement offices, etc.

Certain activities for our company are carried out by subcontractors (or other suppliers and business partners). For the purpose of performing these activities, it is required that such a subcontractor be provided with your personal data to the extent necessary for the purpose of fulfilling the tasks of the subcontractor. Such external subcontractors are mainly external accounting, tax and other consulting companies, companies operating web hosting and server and/or data storage management, legal representatives and others. Specifically, companies and activities may be subject to changes according to the current needs of My company.

We may also share your personal data with our clients if you are a supplier who supplies our company with products (i.e. goods/services) that our company provides to such clients.

5.4.5. Transfer of personal data

The controller can process some personal data (for example, name, surname and e-mail) also through electronic systems and data storages operated by persons (intermediaries) outside the European Union. The controller always checks whether they ensure the highest possible protection of personal data in accordance with the relevant legislation (i.e. they are part of the European Commission's adequacy decision, for example part of the EU-US Privacy Shield program if they are located in the USA, etc.).

5.4.6. Time of personal data processing

Your personal data will be processed by EXREAL s.r.o. for the duration of the contractual relationship with you as a supplier. After the termination of the contractual relationship and the settlement of all obligations resulting from or related to such a contractual relationship, our company stores your personal data for the necessary time, namely for the period required by the relevant legal regulations. Unless such a period is stipulated by law, our company is entitled to store your personal data for at least two years from the date of termination of the contractual relationship. In the event of a legal dispute with you (as a data subject), at least two years from the date of legal termination of the legal dispute.

This document was prepared in Slovak and English language versions. In case of any differences between the Slovak and English language versions, the Slovak language version will be decisive.