

# Statement on Personal Data Processing

## (General Information)

In accordance with Regulation<sup>1</sup> and the Personal Data Protection Act<sup>2</sup>, the data controller, Euro Energy Slovakia Holding, a.s., Lichnerova 38, 903 01 Senec, ID No.: 44 883 536 (hereinafter referred to as the “Company” or the “Controller”), processes your personal data to the extent and under the conditions set out in specific legislation.

This Statement on Personal Data Processing (hereinafter referred to as the “Statement”) provides basic information about your rights regarding the processing of personal data by the Company, as well as information on how to access your personal data.

### **PURPOSE, LEGAL BASIS, AND RETENTION PERIOD FOR PERSONAL DATA PROCESSING**

#### **Supplier-Customer Relationships**

Based on a pre-contractual or contractual relationship in which you are one of the contractual parties under Article 6(1)(b) of the Regulation, and also based on the Company’s legitimate interest under Article 6(1)(f) of the Regulation, we process your personal data, primarily within supplier and customer contracts, as data necessary to conclude and perform contractual relationships.

In connection with concluding and fulfilling a contract, the Company may also process your personal data based on its legitimate interest under Article 6(1)(f) of the Regulation for purposes such as insuring receivables/provided services, credit risk assessment, sending general marketing messages and informational materials to customers via email regarding news and events related to the Company, its products and services, event invitations, etc.

We obtain your personal data either directly from you, if you are authorized to act on behalf of a company with which we are entering into a contractual relationship, or from your employer as data necessary for contact regarding contract performance, or from public registers (e.g. trade register, commercial register, land registry, etc.). If you do not provide personal data, the Company cannot establish a contractual relationship with you where such processing is necessary for contract conclusion and performance.

Your personal data will be stored for the duration of the contractual relationship and subsequently for archival purposes for **10 years after the contract has expired**.

#### **Accounting**

We also process your personal data to fulfill the Company’s legal obligations in maintaining accounting records under Article 6(1)(c) of the Regulation (particularly obligations under the Accounting Act<sup>3</sup> and the VAT Act<sup>4</sup>). Your personal data on accounting documents/invoices is stored for **10 years following the year to which the records/invoices relate**.

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<sup>1</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

<sup>2</sup> Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments and Supplements to Certain Acts.

<sup>3</sup> Act No. 431/2002 Coll. on Accounting, as amended.

<sup>4</sup> Act No. 222/2004 Coll. on Value Added Tax, as amended.

## **Supervisory Activities**

The Company processes your personal data in connection with:

- a) Fulfilling its legal obligations in areas such as occupational health and safety<sup>5</sup> (which may include alcohol breath tests conducted by authorized personnel), fire protection, environmental protection, prevention of major industrial accidents, and waste management. This obligation also applies to individuals present at the workplace with the employer's knowledge, under Article 6(1)(c) of the Regulation.
- b) Contractual compliance monitoring with suppliers, adherence to work procedures and responsibilities based on contracts and internal regulations, under the legitimate interest of the Company in protecting its assets and ensuring contract fulfillment under Article 6(1)(f) of the Regulation.

If an incident is detected, records are kept until the necessary steps to resolve the matter are completed.

## **Registry and Mail Management**

We may also process your personal data for the purpose of managing the registry and mail records, as required by applicable legislation under Article 6(1)(c) of the Regulation (especially under the Archives and Registries Act<sup>6</sup> and the e-Government Act<sup>7</sup>). Retention periods are determined by specific regulations.

## **Suggestions, Complaints, Customer Claims, and Damages**

Based on a contractual or pre-contractual relationship under Article 6(1)(b) of the Regulation, we process your personal data to resolve and handle your suggestions, complaints, customer claims, and incidents (including insurance claims) if you are or have been our customer, or have submitted such a suggestion or complaint to the Company. Data is retained during the resolution process and for **5 years after the calendar year in which the matter was resolved.**

## **Legal Proceedings/Out-of-Court Debt Collection**

We may process your personal data for out-of-court debt recovery, dispute resolution (active and passive cases), and to assert or defend the Company's legal claims, based on the Company's legitimate interest under Article 6(1)(f) of the Regulation. Personal data is stored for 10 years after the final resolution of the legal case. The retention period begins on the first day of the year following the year of the case's resolution.

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<sup>5</sup> For example, Act No. 124/2006 Coll. on Occupational Safety and Health Protection and on Amendments and Supplements to Certain Acts, as amended.

<sup>6</sup> Act No. 395/2002 Coll. on Archives and Registries and on Amendments and Supplements to Certain Acts, as amended.

<sup>7</sup> Act No. 305/2013 Coll. on the Electronic Exercise of the Powers of Public Authorities and on Amendments and Supplements to Certain Acts (the e-Government Act), as amended.

## Enforcement Proceedings

We may also process your personal data in enforcement proceedings and related legal claims. The legal basis is the Company's legitimate interest if acting as a claimant (Article 6(1)(f)), or fulfillment of legal obligations under the Enforcement Code<sup>8</sup> (Article 6(1)(c)) if acting as a debtor or third party. Data is stored for **10 years after final resolution**, with the retention period starting the following year.

## Other

After the retention periods expire, personal data is deleted unless a legal reason remains (e.g. legal claim enforcement, legal or administrative proceedings).

## DATA PROTECTION PRINCIPLES

Your personal data is processed solely under lawful conditions as defined in the Regulation or Personal Data Protection Act. As the data subject, you are the individual whose personal data is processed. The Company has a legal obligation to provide your personal data during inspections, supervisory activities, or to state authorities and institutions, if required by law<sup>9</sup>.

The Company may provide your personal data to recipients or third parties such as legal representatives (attorneys), notaries, enforcement officers, auditors, insurance companies, banks, Slovenská pošta, intermediaries (if authorized), and other authorized entities under applicable law. The Company declares it has valid contracts with processors who ensure adequate personal data protection in line with current legislation.

Your personal data will be securely stored, in accordance with the data controller's and processor's security policies, and only for as long as necessary. Only persons authorized by the controller, acting under its instructions and security policy, will access your data.

Your data is backed up according to retention rules and will be completely deleted from backup storage as soon as permitted. Backups are intended to prevent security incidents, particularly data availability issues due to such incidents. The Company is obligated to ensure data backup per security requirements of the Regulation and Personal Data Protection Act.

Your personal data processed for the purposes in this Statement is not subject to automated decision-making, including profiling. It will not be disclosed or transferred to third countries or international organizations.

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<sup>8</sup> Act No. 233/1995 Coll. on Court Executors and Execution Proceedings (Execution Order) and on Amendments and Supplements to Certain Acts, as amended.

<sup>9</sup> For example, Act No. 171/1993 Coll. on the Police Force, as currently in force; Act No. 18/2018 Coll. on Personal Data Protection and on Amendments and Supplements to Certain Acts.

## DATA PROTECTION OFFICER

The security and compliance of data processing are overseen by a Data Protection Officer. You can contact them to exercise your rights.

Contact Details of the Data Protection Officer

E-mail: [zodpovednaosoba@euroenergysk.sk](mailto:zodpovednaosoba@euroenergysk.sk)

Correspondence address: Data Protection Officer (DPO)

Euro Energy Slovakia Holding, a.s., Lichnerova 38, 903 01 Senec, Slovak Republic

## YOUR RIGHTS UNDER THE REGULATION AND THE PERSONAL DATA PROTECTION ACT

The Regulation and the Act grant you rights as a data subject, including detailed information on redress mechanisms and limitations (in particular Articles 15–22, 77, 79, and 82 of the Regulation and Sections 21–28, 38 of the Act). You may request access to your data, rectification, deletion, or restriction of processing. You may object to processing based on legitimate interest or to direct marketing. You also have the right to data portability.

### Right to Information

If the controller processes your personal data, they must provide you with information about the processing without you needing to request it, including the purpose, legal basis, retention period, identity and contact details of the controller (and their representative, if applicable), data recipients (including safeguards for international transfers), the controller's or third party's legitimate interests, your data protection rights, and available remedies.

In case of automated decision-making, including profiling, you must be informed in a clear manner about the logic used and the significance and consequences of such processing. The controller provides this information through this Statement.

### Right of Access to Data

You have the right to obtain from the controller confirmation as to whether or not personal data concerning you are being processed. Where that is the case, you have the right to access such personal data and the following information: the purposes of processing, the categories of personal data concerned, the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period, your rights to protect your personal data and the possibility of exercising legal remedies (including the right to lodge a complaint with a supervisory authority), and the source of the personal data if they were not collected from you directly.

Upon your request, the controller shall provide a copy of the personal data undergoing processing. For any further copies requested, the controller may charge a reasonable fee based on administrative costs. The right to obtain a copy shall not adversely affect the rights and freedoms of others. The controller will inform you about the method, costs (if any), and further details of providing the copy after receiving your request.

If you submitted your request by electronic means, the information will be provided in a commonly used electronic format unless otherwise requested.

In cases of automated decision-making, including profiling, you have the right to access information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.

### **Right to Rectification**

You have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of processing, you have the right to have incomplete personal data completed, including by providing a supplementary statement.

### **Right to Erasure (“Right to Be Forgotten”)**

You have the right to obtain from the controller the erasure of personal data concerning you without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- You withdraw consent and there is no other legal ground for the processing;
- The personal data have been unlawfully processed;
- You object to the processing and there are no overriding legitimate grounds for the processing;
- The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- The personal data have been collected in relation to the offer of information society services.

In certain cases, the controller may not be able to comply with your request, such as when processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, for the performance of a task carried out in the public interest, for reasons of public interest in the area of public health, for archiving purposes in the public interest, or for the establishment, exercise or defense of legal claims.

### **Right to Restriction of Processing**

You have the right to obtain restriction of processing where one of the following applies:

- a) You contest the accuracy of the personal data, for a period enabling the controller to verify the accuracy of the personal data;
- b) The processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- c) The controller no longer needs the personal data for the purposes of the processing, but you require them for the establishment, exercise or defense of legal claims;
- d) You have objected to processing pending the verification whether the legitimate grounds of the controller override yours.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or a Member State.

The controller shall inform you before the restriction of processing is lifted.

### **Right to Data Portability**

You have the right to receive the personal data concerning you, which you have provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance, where:

a) The processing is based on your consent or a contract; and

b) The processing is carried out by automated means.

You also have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

The exercise of this right shall not adversely affect the rights and freedoms of others and shall not affect the right to erasure

### **Right to Object**

You have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you which is based on legitimate interests pursued by the controller, including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or for the establishment, exercise or defense of legal claims.

Where personal data are processed for direct marketing purposes, you have the right to object at any time to such processing, including profiling to the extent that it is related to such direct marketing. If you object, your personal data shall no longer be processed for such purposes.

### **Right to Withdraw Consent at Any Time**

Where the processing of your personal data is based on your consent, you have the right to withdraw that consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. Withdrawing consent must be as easy as giving it.

You may withdraw consent by sending a notice to the controller's registered address, to the email address of the Data Protection Officer, or in the manner specified in the original consent form.

### **Right to Lodge a Complaint with a Supervisory Authority**

If you believe that the processing of your personal data infringes the GDPR or the Data Protection Act, you have the right to lodge a complaint with a supervisory authority:

#### **Office for Personal Data Protection of the Slovak Republic**

Hraničná 12, 820 07 Bratislava 27

Phone: +421 /2/ 3231 3214

E-mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk)

Website: <https://dataprotection.gov.sk>

### **Right to an Effective Judicial Remedy**

You have the right to an effective judicial remedy if you consider that your rights under the GDPR or the Data Protection Act have been infringed as a result of the unlawful processing of your personal data. You may bring proceedings before the courts of the Member State where the controller has an establishment or where you have your habitual residence.

### **Right to Compensation and Liability**

Any person who has suffered material or non-material damage as a result of an infringement of the GDPR or the Data Protection Act shall have the right to receive compensation from the controller for the damage suffered.

The controller shall be liable for any damage caused by processing that infringes the Regulation or Act, unless they prove that they are not in any way responsible for the event giving rise to the damage.

If you have any questions regarding the processing of your personal data, you may contact our Data

Protection Officer.

Any changes to the conditions of personal data processing and protection will be published on our website by updating this Statement. This ensures that you always have access to the latest information about the conditions under which we process your personal data.

