

# PERSONAL DATA PROCESSING STATEMENT

## concerning processing operations related to the “BONUS club” programme

(effective from: 1 July 2022)

	Description and purpose of the data processing	Legal basis of the data processing	Scope and source of the personal data processed	Duration of data processing	Recipient of the data transfers	Data processor and the data processing activity(s)
I.	<p><b>BONUS club - loyalty programme and ensuring its operation</b> The controller operates the customer loyalty programme according to the GTC of the BONUS club. This includes all activities from registration in the programme, its administration and operation on the basis of the General Terms and Conditions (GTC) of the BONUS club.</p>	<p>Article 6(1)(b) of the GDPR (processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract) on the basis of the GTC of the BONUS club.</p>	<p>Name and surname, address, e-mail, telephone number, date of birth, card number, data on the use of the card, password in case of online registration, registering customer’s sex, signature (in case of paper registration), date of registration.</p> <p>Data source: provided by the data subject (sex is required to address the customer, date of birth is required to identify that the applicant is aged 18 years).</p> <p>SLOVNAFT GO – the SLOVNAFT GO application can also be used for account management, use and display. In that event, also the fact that you participate in the loyalty programme (if this information is voluntarily provided by the User), the User’s BONUS club account e-mail address, the BONUS club account password, BONUS club card number, BONUS club card in Apple Wallet status (added, not added), personal data for registration into BONUS club programme (first name, last name, date of birth), BONUS club status, BONUS club balance, list of transactions from the past 90 days, details of each transaction, i.e. the date, balance change, purchase value, purchase location.</p>	<p>During membership in the BONUS club and up to 3 years after termination of membership. Civil claims can generally be enforced for that period in accordance with Act No. 46/1994 Coll. – the Civil Code.</p>	<p>SLOVNAFT a.s. and Multipont Program Zrt. are joint controllers, there is no other data transfer recipient.</p>	<p><b>MOL IT &amp; Digital GBS Kft. (1117 Budapest, Budafoki út 79.) and Axiom Consulting Ltd. (Cyprus, 2107 Nicosia, 21 Academias Avenue)</b> – provide IT and server services closely related to the data processing and storing.</p> <p><b>IBM Magyarországi Kft., (Neumann János u 1., 1117 Budapest, Hungary)</b> – checking of personal data of BONUS club members filled out in connection with registration, evaluation and potential correction of data quality - typos and errors in data, analytical activities (f.e. number of wrong format e-mails/phone numbers).</p>

						<p>In the case of paper registration, the registration is done by the employees of the respective partner operating the service station. The list of service station partners is available at <a href="https://cerpaciestanic.e.slovnaft.sk/">https://cerpaciestanic.e.slovnaft.sk/</a></p> <p>The list of other processors can be found at <a href="http://www.bonusklub.sk">www.bonusklub.sk</a></p>
II.	<p><b>Sending general marketing messages (advertisements), promotional offers, vouchers, requests to participate in satisfaction surveys or other surveys via e-mail, SMS (short messages) or via the SLOVNAFT GO application, if you download it.</b></p> <p>The controller will try to allow you to select several communication channels by marking the appropriate communication channel.</p>	<p>Article 6(1)(f) of the GDPR (processing is necessary for the purposes of the legitimate interests pursued by the controllers). The legitimate interest: promoting the products and services of the controllers to potential customers, promoting the activities of the controllers and gaining insights into the opportunities and expectations of customers.</p>	<p>First name and surname, e-mail address and BONUS club card number of the User, the contents of the advertisement messages and invitations sent to the data subject. Source of data: received from the data subject.</p>	<p>Until the data subject objects to the processing.</p>	<p>SLOVNAFT a.s. and Multipont Program Zrt. are joint controllers, there is no other data transfer recipient.</p>	<p><b>MOL IT &amp; Digital GBS Kft. (1117 Budapest, Budafoki út 79.) and Axiom Consulting Ltd. (Cyprus, 2107 Nicosia, 21 Academias Avenue)</b> – provide IT and server services closely related to the data processing and storing.</p> <p>4Service Holdings GmbH (Tegetthoffstraße 7, 1010 Vienna, Austria; tax number: 09 253/0476) – distributes general mass commercial communications, sending customer feedback e-mails (member satisfaction survey) and provide</p>

						<p>statistical analysis of the received responses (statistical evaluation of the survey results).</p> <p>The list of other processors can be found at <a href="http://www.bonusklub.sk">www.bonusklub.sk</a></p>
III.	<p><b>Sending personalised marketing messages, promotional offers, vouchers via e-mail, SMS (short messages) or via the SLOVNAFT GO application, if you download it; and recommending the above messages, promotional offers, vouchers on the screen, at purchases or at service stations.</b></p> <p>In the absence of special consent, we do not send personalised marketing messages (advertisements), promotional offers, customised vouchers to data subjects. The controller will try to allow you to select several communication channels by marking the appropriate communication channel.</p>	<p>Article 6(1)(a) of the GDPR (the data subject's consent).</p> <p>Profiling: Article 22(2)(a) of the GDPR (the data subject's express consent).</p> <p>The data subject may withdraw his/her consent any time. Such withdrawal will not affect the legitimacy (lawfulness) of the data processing based on the consent granted prior to the withdrawal.</p>	<p>Name and surname of the recipient, e-mail, telephone number, date of birth, sex, card number, data on the use of the card (shopping behaviour), scope of interest related to the offered services / products.</p> <p>Data source: provided by the data subject (profiles compiled by MOL Nyrt. and Multipont Program Zrt.)</p>	<p>Until the data subject withdraws his/her consent.</p>	<p>SLOVNAFT a.s. and Multipont Program Zrt. are joint controllers, there is no other data transfer recipient.</p>	<p><b>MOL IT &amp; Digital GBS Kft. (1117 Budapest, Budafoki út 79.) and Axiom Consulting Ltd. (Cyprus, 2107 Nicosia, 21 Academias Avenue)</b> – provide IT and server services closely related to the data processing and storing.</p> <p>The list of other processors can be found at <a href="http://www.bonusklub.sk">www.bonusklub.sk</a></p>
IV.	<p><b>Prevention, detection and investigation of fraud and misuse in connection with BONUS club services.</b></p> <p>The Ethical and Business Conduct Code, Business Partner Ethical Code, Ethical Council Procedural Rules (the „Ethical Code”) of MOL Group that govern the</p>	<p>Article 6(1)(f) of the GDPR (processing is necessary for the purposes of the legitimate interests pursued by the controllers). Legitimate interest: the prevention, detection of infringements</p>	<p>First name and surname, e-mail address, data registered in the BONUS club, the data produced while conducting the investigation. The controllers process the data necessary to conduct the investigation (e.g. card number together with other data on a “receipt”, or name, item number, price of the purchased product(s), data and place of the purchase etc.) and other data as long as they are needed to detect and</p>	<p>If the investigation reveals that the suspected fraud or misuse is unfounded or no further action is required, the data relating to the investigation shall be deleted within 60 days from the completion of the investigation.</p>	<p>The members of the MOL Group's Ethics Board have access to the data needed for the investigation.</p>	<p><b>MOL IT &amp; Digital GBS Kft. (1117 Budapest, Budafoki út 79.) and Axiom Consulting Ltd. (Cyprus, 2107 Nicosia, 21 Academias Avenue)</b> – provide IT and server services closely related to the data processing and storing.</p>

	prevention, detection and investigation of fraud and misuse are available here: <a href="https://slovnaft.sk/sk/o-nas/eticke-principy/">https://slovnaft.sk/sk/o-nas/eticke-principy/</a>	endangering the Controller's assets, trade secrets, intellectual property, business reputation; appropriate, respect-based, fear and retaliation free work environment as well as the prosecution of liable persons for those infringements.	investigate a possible misuse of the programme.	If, on the basis of the investigation, measures are taken, including measures relating to legal proceedings initiated or disciplinary measures taken against the reporting person, the data relating to the violation can be processed until the final conclusion of the proceedings at the latest.		The list of other processors can be found at <a href="http://www.bonusklub.sk">www.bonusklub.sk</a>
V.	<b>Management of requests, complaints and defect claims in connection with the SLOVNAFT GO Services (we provide a separate statement on this at: .....</b>	The provisions laid down in the separate Data Protection Notice apply.				

**Name, registered office, telephone number, website and e-mail address of the joint controllers:**

- **SLOVNAFT, a. s.**  
Registered office: Vlčie hrdlo 1, 824 12 Bratislava, Slovak Republic, Company Reg. No.: 31 322 832, Telephone number: 0800 111 811, Website: [www.bonusklub.sk](http://www.bonusklub.sk)  
E-mail address: [bonusklub@slovnaft.sk](mailto:bonusklub@slovnaft.sk)
- **Multipont Program Zrt.** (registered office: 1117 Budapest, Budafoki út 79., Telephone number: +36 1 886 5000; Website: [www.multipont.hu](http://www.multipont.hu); E-mail address: [ugyfelszolgalat@mol.hu](mailto:ugyfelszolgalat@mol.hu))

SLOVNAFT, a.s. and Multipont Program Zrt. are the joint data controllers that jointly defined the purpose and framework of the data processing and are jointly responsible for such data processing.

The controllers have a joint privacy notice.

**Contact details of the controller's Data Protection Officer:**

Under Article 37 of the GDPR, the Controller has designated the Data Protection Officer with the following contact details:

E-mail address: [zodpovednaosobagdpr@slovnaft.sk](mailto:zodpovednaosobagdpr@slovnaft.sk)

Correspondence address: Data Protection Officer pursuant to the GDPR, SLOVNAFT, a. s., Vlčie hrdlo 1, 824 12 Bratislava

**Persons authorised to process your personal data:** Your personal data will be processed only by a narrow circle of authorised persons designated by the Controller.

**Processing special categories of personal data (the “sensitive data”) for the purposes specified in this Data Protection Notice:**

No special categories of personal data are processed.

**Data transfers to third countries:**

No data will be transferred to a third country.

**The existence of automated decision-making, including profiling, and at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject:**

Automated individual decision-making and profiling are performed if you have wanted it yourselves and marked it in your profile.

**Your data protection rights:**

Regulation (EU) 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, and repealing Directive 95/46/EC (General Data Protection Regulation – **GDPR**) contains details of your rights as a data subject, the remedies available and their limitations (especially Articles 5, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79 and 82 of the GDPR). You may, at any time, request information about the processing of personal data relating to you, you may request their rectification and erasure or restriction of their processing, and you may also object to the processing of the personal data on the basis of a legitimate interest. The most important provisions are summarised below.

**Right to information:**

If the controller processes your personal data, the controller shall provide you with information about the data concerning you, even without being specially requested by you to do so, including the main data processing features, such as the purpose, legal basis and duration of the data retention (processing), the identity and contact details of the controller and, where applicable, its representative, the contact details of the Data Protection Officer, the recipients of the personal data, the legitimate interests of the controller and/or third parties in the processing of personal data based on a legitimate interest, your data protection rights and available legal remedies (including the right to lodge a complaint with a supervisory authority) if such information is not already available to you. The controller shall provide you with the said information by making this Data Protection Notice available.

**Right of access:**

You have the right to obtain a confirmation from the controller as to whether or not the personal data concerning you are processed and, if so, you are entitled to have access to 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 personal data have been or will be provided, including without limitation, recipients in third countries or international organisations, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period, the data subject’s right to protection of his/her personal data and his/her option to apply legal remedies (including the right to lodge a complaint with a supervisory authority), as well as information about the source of the personal data, if the personal data have not been collected from you as the data subject.

Upon your request, the controller shall provide you with a copy of your personal data being processed. For any further copies requested by you, the controller may charge a reasonable fee based on administrative costs. If you submitted your request by electronic means, the information should be provided in a commonly used electronic format, unless otherwise requested by you. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

The controller shall provide you with information on the possibility, the used procedure, the possible costs and other details of providing a copy upon receipt of your request.

**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 the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

**Right to erasure:**

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 the personal data without undue delay where certain grounds apply or certain conditions are met. Upon your request, the controller shall, *inter alia*, erase your personal data where, for example, such data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; if you withdraw your consent on which the processing is based and where there is no other legal ground for the processing; if the personal data have been unlawfully processed; or if you object to the processing and there are no overriding legitimate grounds for the processing; if the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

The foregoing shall not apply to the extent that processing is necessary:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject;
- c) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- d) for the establishment, exercise or defence of legal claims.

**Right to restriction of processing:**

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

- a) the accuracy of the personal data is contested by you, 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 they are required by you for the establishment, exercise or defence of legal claims;
- d) you have objected to processing, pending the verification whether the legitimate grounds of the controller override your legitimate grounds.

Where the processing has been restricted for any of the above-mentioned reasons, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence 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 of a Member State.

You shall be informed by the controller before the restriction of processing requested by you is lifted.

**Right to data portability:**

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

- a) the processing is based on your consent or on a contract (to which you are a party); and

b) the processing is carried out by automated means.

In exercising your right to data portability, you have the right to have the personal data transmitted directly from one controller to another, where technically feasible. The exercise of the right to data portability shall not affect the provisions governing the right to erasure. The right to data portability shall not adversely affect the rights and freedoms of others.

**Right to object:**

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

**Right to withdraw your consent at any time**

Where the controller processes your personal data on the basis of your consent, you have the right to withdraw it at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. It shall be as easy to withdraw as to give consent.

You can deliver the withdrawal of your consent by post to the address of the controller's registered office or to the Data Protection Officer's e-mail address, or in the manner specified in the consent granted.

**How to exercise your rights:**

The controller shall provide information on action taken on a request based on your above-mentioned rights without undue delay and in any **within one month** of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall inform you of any such extension within one month of receipt of the request, together with the reasons for the delay. Where you made the request by electronic means, the information shall be provided by electronic means, where possible, unless otherwise requested by you.

If the controller does not take action on your request, the controller shall inform you without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with the competent supervisory authority in the Slovak Republic: Office for Personal Data Protection of the Slovak Republic (in Slovak: "Úrad na ochranu osobných údajov Slovenskej republiky") and seeking a judicial remedy. Contact information of the Office for Personal Data Protection of the Slovak Republic: Hraničná 12, 820 07 Bratislava 27, Tel.: +421 /2/ 3231 3214, E-mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk), Website: <https://dataprotection.gov.sk>.

The above information shall be provided in writing or by other means, including, where appropriate, by electronic means. The information may also be provided orally if you so request, provided that your identity is proven by other means.

Without prejudice to any other administrative or judicial remedies, you have the right to lodge a complaint with a supervisory authority, particularly in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR. You have the right to an effective judicial remedy against a legally binding decision of the supervisory authority concerning you. You also have the right to an effective judicial remedy where the competent supervisory authority does not handle a complaint or does not inform you within three months on the progress or outcome of the complaint lodged. Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, you have the right to an effective judicial remedy where you consider that your rights under the GDPR have been infringed as a result of the processing of your personal data in non-compliance with the GDPR. Proceedings against the controller or processor shall be brought before the courts of the Member State where the controller or processor has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where you have your habitual residence.

The court may order the controller to provide the relevant information, to rectify, block or erase such information, to annul a decision adopted by means of automated data-processing, or to honour your right to object. The court may also order the publication of its judgement in a manner that can clearly identify the controller or the relevant processor as well as the infringement committed by them.

You may claim compensation for damage incurred in connection with the unlawful processing of your personal data (including the failure to take data security measures) by the controller responsible for the damage or the processor. A processor shall be liable for the damage caused by processing only where it has failed to comply with the obligations specifically imposed by the GDPR on processors or where it has acted outside or contrary to lawful instructions of the controller. Where any of the above persons violates your personality rights as a result of the unlawful processing of your data or a breach of data security requirements, you may claim damages from such person.

The controller or the processor shall be released from liability for damage caused by unlawful processing if it proves that it is not liable for the event which caused the damage (i.e. the damage has not occurred through its fault).