

PRIVACY NOTICE

Camera Surveillance Systems (CCTV) at Filling Stations of SLOVNAFT, a.s.

(hereinafter also referred to as “Privacy notice”)

SLOVNAFT, a. s., Vlčie hrdlo 1, 824 12 Bratislava, Identification No.: 31 322 832, registered in the Commercial register in the District Court Bratislava I, Section: Sa, Insert No.: 426/B (hereinafter also referred to as “the Company” or “the Controller”) hereby informs those who enter the premises of filling stations of the Company (hereinafter also referred to as “the Premises”) of the following matters:

1. RULES OF CONDUCT

SLOVNAFT, a.s. considers that anyone entering its Premises undertakes to observe the rules set out in this document.

Any audio records, visual records and photographs may be produced in the Premises of the Company only in a previously agreed manner and based on a written authorization issued by the Company in advance.

The Company reserves the right to banish from the Premises in the Company's ownership any person committing a crime or offence and reserves the right to reject to enter into a legal relationship with such person.

It is forbidden to enter and bring to the Premises of the Company any fire-arms, munition, alcohol for direct consumption, drugs, hallucinogenic substances, knives or swords (with a blade longer than 8 cm) or any items associated with a risk of hitting or causing injury, poisonous, explosive, radioactive or chemical materials, or any items that pose a serious risk to the safety, health and life of persons present at the Premises of the Company.

2. INFORMATION ON PERSONAL DATA PROTECTION RELATING TO THE OPERATION OF A CAMERA SURVEILLANCE SYSTEM AT FILLING STATIONS OF SLOVNAFT, a.s.

The camera surveillance system (CCTV) at filling stations is operated by SLOVNAFT, a.s.

Your personal data are only processed in compliance with statutory requirements stipulated in the Regulation¹ or Act on Personal Data Protection².

You are a **data subject** in the course of processing of personal data by the Controller, which means that you are the person to whom processed personal data relate.

Data Protection Officer:

Safe processing of personal data and compliance of processing with the Regulation and the Act on Personal Data Protection are supervised by the Data Protection Officer whom you can contact in order to exercise your rights.

Contact details of the Data Protection Officer

E-mail: zodpovednaosobagdpr@slovnaft.sk

Address for correspondence: GDPR Data Protection Officer, SLOVNAFT, a.s., Vlčie hrdlo 1, 824 12 Bratislava

¹ 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) (hereinafter also referred to as “the Regulation”).

² Act No. 18/2018 Coll. on Personal Data Protection and on amendment and supplementation of certain acts (hereinafter also referred to as “Act on Personal Data Protection”).

The Controller is legally obliged to disclose your personal data in the course of inspection, supervisory activity or upon request by authorized governmental bodies or institutions if so prescribed by special regulations³.

Your personal data may be further provided to recipients, such as attorneys, processors, provided that have been entrusted with personal data protection on behalf of the Controller, the company MOL Nyrt., with registered office at Október huszonhamadika, 18 Budapest, Hungary, exclusively for the Ethics Council, as specified further in the text of this Privacy notice. The Company declares that it has duly concluded contracts with its processors who ensure an appropriate level of personal data protection in compliance with applicable legal regulations pertaining to personal data protection.

Processor 1:

Partner of the filling station

Partner of the filling station and employees of such partner operating the filling station have access to the live footage (images) and records on the spot so that they can perform their work duties. They are not allowed to change the settings or download camera recordings.

Processor 2:

Company ensuring installation, servicing and downloading of camera recordings from the system. Maintenance technician - performs installation of the camera system, activities leading to its commissioning, necessary maintenance interventions in case of malfunctioning or a change of the camera system and downloads camera recordings. All activities are only performed based on and within the scope of the Controller's request.

Processor 3:

Security service providing remote control

Employees of the Security Service providing services associated with the protection of property may view live footage (images) via remote access.

Your personal data are not subject to automated decision-making, including profiling. We do not disclose your personal data and do not transfer them to third countries or international organizations.

3. PERSONAL DATA WE PROCESS ABOUT YOU

The Company as the Controller processes your personal data within the scope of the camera records - image recording (the camera system catches and records images of persons entering the area monitored by cameras and actions of such persons). A camera record is merely a visual and not a sound record. No special categories of personal data is subject to processing.

4. PURPOSE AND LEGAL BASIS OF THE PERSONAL DATA PROCESSING

Using the camera system monitoring, your personal data are processed for the purpose of:

Protection of property, health and safety of persons and financial interests of the Company

It is the legitimate interest of the Company (Art. 6(1)(f) of the Regulation) to ensure protection of property, assets and financial interests of the Company, as well as the safety and protection of life and health of persons present at the Premises of the Company (filling station) and that also as far as any potential manipulation with chemical substances is concerned.

Observation of contractual terms and conditions by contractual partners

It is a legitimate interest of the Company (Art. 6(1)(f) of the Regulation) to ensure observation of:

- generally binding legal regulations in the area of health and security at work, fire protection, environmental protection, prevention of serious industrial accidents and waste management,
- contractual terms and conditions by a contactor (contractual partner of the Company) by inspection of observance of work processes, obligations and tasks resulting from contractual relationships and internal regulations of the Company,

³ For example Act No. 171/1993 Coll. regarding Police Force as amended; Act on Personal Data Protection.

- rules established by the MOL Group Business Partner Code of Ethics.

Handling and investigation of suggestions, complaints and claims

It is a legitimate interest of the Company (Art. 6(1)(f) of the Regulation) or it results from a pre-contractual or contractual relationship to which the data subject is one of the parties (Art. 6(1)(b) of the Regulation) to ensure handling and investigation of suggestions, complaints, claims and damage caused in connection with sale of goods and provision of services at filling stations of the Company.

Observance of principles and rules set out in the Code of Ethics

It is a legitimate interest of the Company (Art. 6(1)(f) of the Regulation) to ensure in individual cases use of camera records as part of a procedure by the Ethics Council operating in the MOL Group in order to see into fraud, misuse or non-ethical behaviour that violates the principles and rules set out by the MOL Group in the MOL Group Code of Ethics and Business Conduct and the MOL Group Business Partner Code of Ethics.

Premises monitored by camera system

The following areas are monitored by the camera system in particular:

- entrances and exits from the shop,
- shop,
- fuel dispensing stands,
- entries to and exits from the filling station,
- immediate vicinity of the filling station,
- areas with technology facilities of the Company (e.g. car wash, vacuum cleaner, places for fuel storage filling, storage of LPG and PB (propane butane) bottles, etc.).

Individual cameras of the camera system are located at filling stations in a manner preventing any threats to dignity and inappropriate interference with the rights and freedoms and legitimate interests of a data subject, in particular in a manner respecting private and personal life of data subjects. Cameras do not monitor areas where inappropriate interference with the rights and freedoms of data subjects might occur, in particular, lavatories and changing rooms for persons working at the filling stations.

Personal data storage period

Your personal data in the form of a camera record shall be stored for a maximum of 10 days from its production and upon expiry of this period at the latest shall be destroyed by the Company with due care, except for a record used to exercise of legal claims. In case of detection of an incident, documentation, investigation or detection of circumstances pursuant to individual purposes of processing, the records are copied to a special medium at this time and kept until completion of actions necessary for achievement of the purpose of personal data processing.

Your personal data shall be stored in a secure manner, in compliance with the Controller's and processor's security policy and only for the period necessary for fulfilment of the purpose of processing.

Persons with access to records

Your personal data shall be only accessible to persons entrusted by the Controller with personal data processing who process such data upon instructions issued by the Controller and in compliance with the Controller's security policy.

The Processor and every person acting upon authorization by the Controller or the processor and having access to personal data may process such personal data only upon instructions by the Controller, except for cases when such processing is prescribed by a special legal regulation.

5. YOUR RIGHTS PURSUANT TO THE REGULATION AND THE ACT ON PERSONAL DATA PROTECTION

The Regulation or Act on Personal Data Protection contains detailed information regarding your rights to personal data protection, available effective remedy, as well as their restriction (in particular Art. 15-22 and 82 of the Regulation). You may request information regarding personal data processing which relates to you at any time, you can request rectification or erasure of your personal data or restriction

of their processing, and you can object to personal data processing based on a legitimate interest. The most important provisions are summarized below.

Right to information

Where the Controller processes your personal data, it must provide you information concerning the data relating to you and that even without your specific request for their provision, including main characteristics of data processing such as the purpose, legal basis and period of storage (processing), identity and contact details of the Controller and in relevant cases of the Controller's deputy, recipients of personal data (in case of transfer of personal data to third countries, also statement of appropriate and suitable safeguards), legitimate interests of the Controller and/or third parties in case of personal data processing based on a legitimate interest, your rights to protection of data and your possibilities to use effective remedy (including the possibility to lodge a complaint with the supervisory authority). The Controller shall provide you with the information above by making this Privacy notice available to you.

Right of access

You have the right to obtain from the Controller confirmation whether any personal data relating to you are processed or not and if they are, you have the right to access such data and information like: purposes of processing, categories of personal data concerned, recipients or categories of recipients, estimated period for which the personal data will be stored, right of the data subject to protection of his or her personal data and the possibility to exercise an effective remedy (including the right to lodge a complaint with a supervisory authority), information regarding the source of personal data in case they have not been obtained from you as a data subject. Upon your request the Controller shall provide a copy of your personal data undergoing processing. For any further copies requested by you, 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 provide you with information regarding the possibility, procedure applied, potential costs and further detailed information on the provision of the copy after receipt of your request.

Where you make the request by electronic means, and unless otherwise requested by you, the information shall be provided to you in a commonly used electronic.

Right to rectification of processing

You have the right to ask the Controller to rectify without undue delay any incorrect personal data related to you. Taking into account the purposes of processing, you shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to erasure (“right to be forgotten”)

You also have the right to obtain from the Controller the erasure of personal data concerning you without undue delay, and the Controller shall have an obligation to erase personal data without undue delay where certain reasons or conditions apply. The reasons for which the Controller is obliged to erase your personal data upon you request include for example: the personal data are no longer required for purposes for which they were obtained or otherwise processed; you withdraw the consent on which the processing is carried out and there is no legal basis for processing; the personal data were processed unlawfully or you object to processing and no legitimate reasons for processing prevail; 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; or the personal data have been collected in relation to the offer of services of an information society. In certain cases, the Controller shall not be able to satisfy your request, e.g. if the processing of personal data is required for the establishment, exercise or defence of legal claims.

Right to restriction of processing

You shall 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 you require them 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 processing has been restricted for any of the abovementioned 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 is lifted.

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 legitimate interests of the Controller, including objecting to profiling based on those provisions. The Controller shall no longer process the personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

6. YOUR LEGAL REMEDIES

The Company as the Controller shall provide you with information regarding measures taken as a result of your request which was based on the rights above, and that without undue delay and in any case **within one month** from delivery of the request. If necessary, such period may be extended by an additional two months, taking into account the complexity and number of requests. The Company shall inform you of each such extension within one month of receipt of the request, together with the reasons for the delay.

If the Company does not take action based on your request, it 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 a supervisory authority which is the Office for Personal Data Protection of the Slovak Republic, <https://dataprotection.gov.sk>, Hraničná 12, 820 07 Bratislava 27; telephone no.: +421 /2/ 3231 3214; E-mail: statny.dozor@pdp.gov.sk and to exercise a judicial remedy or to file a proposal for initiation of proceedings regarding personal data protection in terms of the Act on Personal Data Protection.

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

In case of any violation of your rights, you are entitled to bring an action before the respective court based on the registered office of the Controller. Such proceedings may be brought before the courts of the Member State where the data subject has his or her habitual residence.

The Controller is responsible for damage caused by processing in which the Controller took part and which was in conflict with the Regulation or the Act on Personal Data Protection (for damage caused by unlawful processing). The Controller shall be exempt from liability for damage caused by unlawful processing if it proves that it is not in any way responsible for the event giving rise to the damage (it did not cause the damage).

In case of any questions regarding processing of your personal data, you may contact us through our Data Protection Officer.

All changes in the conditions of processing and protection of personal data are published at our website, as well as available at the filing station at the attending staff in the form of an update of this Privacy notice. This way, we ensure that you can always access up-to-date information regarding the conditions under which we process your personal data.