

Privacy Notice EMPLOYEES

In accordance with the Regulation¹ and the Personal Data Protection Act², the Controller SLOVNAFT, a.s., Vlčie hrdlo 1, 824 12 Bratislava, Identification No.(IČO): 31 322 832, entered into the Business Register of the District Court Bratislava I, Section: Sa, insert no.: 426/B(hereinafter referred to as “Employer” or “Controller”) processes your personal data for the purpose of implementing employment relationships, including the provision of benefits under the Company’s social and safety policy.

For the purposes of this Privacy Notice (hereinafter referred to only as “Privacy Notice”), “Employee” shall mean a person employed full-time or part-time by the Company, persons working based on an agreement on work performed outside employment, a person working based on an agreement on temporary secondment of an employee, including members of management, as well as a person having the status of an employee in accordance with the Company’s relevant internal HR rules.

This Privacy Notice explains how we shall use your personal data collected directly from you or from third parties during the term of your employment relationship with the Company and after this ceased to exist.

By this Privacy Notice, we also provide to the Employees’ family members and to former Employees information on the processing of personal data that have been obtained from the Employees in connection with their employment relationship.

PERSONAL DATA PROTECTION PRINCIPLES

We process your personal data only on legal requirements (legal basis - the right to process personal data) resulting from the Regulation, the Personal Data Protection Act or other specific regulations (e.g. the Labour Code).

As data controller, we have a statutory obligation to provide your personal data for inspection, surveillance, or at the request of competent State authorities or institutions, as provided by special regulations³.

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).

2 Act No. 18/2018 Coll. on Personal Data Protection and on amendment and supplementation of certain acts.

3 For instance, Act No. 171/1993 Coll. on the Police Force as amended or Act No. 18/2018 Coll. on Personal Data Protection and on amendment and supplementation of certain acts.

Your personal data may be further provided to receivers or third parties such as a competent tax office, the Social Insurance Agency in Slovakia, health insurance companies, work health-care service providers, legal representatives (attorneys), distrainers, auditors, insurance companies, contractual partners (if you are a person who enters into contracts on behalf of the Controller/who is a contact person) e.g. also in connection to the provision of electronic signature services by a certified multinational company, sending employers, accommodation providers in case where you are sent on a business trip, processors if they have been authorized to process personal data on behalf of the Controller (e.g. providers of HSE service, fire protection, education, HR services, travel agencies, security service, members of SLOVNAFT/MOL Group providing service to the Controller), MOL Plc. having its registered office on Október huszonharmadika ul. 18 , Budapest, Hungary (based on their legitimate interest for internal administrative purposes within the MOL Group), and other authorized entities in line with applicable legal regulations. In some cases, when processing personal data within the SLOVNAFT / MOL Group, we may also act as joint controllers, where such processing is also covered by a separate supplementary Privacy Notice.

Details on the provision of personal data for individual purposes of processing are indicated in an Annex to this Privacy Notice.

The Employer hereby declares that contracts are properly concluded with processors who ensure appropriate level of personal data protection.

Your personal data shall be stored securely, in accordance with the security policy of the Controller and the processor, and only for the time necessary to meet the purposes of processing. 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 safety policy.

Your personal data are backed up in accordance with the Controller's retention policy. Your personal data shall be completely erased from backup storages as soon as possible in accordance with the backup policy. Personal data stored in backup storages serve to prevent security incidents, in particular, the disruption of data availability due to a security incident. The Controller is required to provide data backup in accordance with the security requirements of the Regulation and the Personal Data Protection Act. We shall store your personal data for a limited time only and erase them when they are no longer needed for processing purposes stipulated in the Annex hereto.

When processing personal data by the Controller, you are the data subject, i.e. the person to whom the data being processed are related.

Providing personal data for the implementation of the employment or similar relationship is a statutory obligation of the data subject and is also necessary for conclusion of a contractual relationship between the employer and the employee. If personal data are not

provided by the employee to the extent necessary to fulfil statutory obligations or obligations arising from contractual relationships, the employer will not be able to fulfil its statutory obligations or its obligations arising from the contractual relationship. Failure to provide personal data may result in the termination or non-disclosure of the employment or relationship, financial damage to the employer as well as to the employee (for example non-payment of financial entitlements), etc.

Your personal data processed for purposes described in this Privacy notice are not subject to automated decision-taking, including profiling. In some cases, it might be necessary to process your personal data outside the territory of the EU. In that case, we will ensure that all the requirements for the transfer laid down by the Regulations for such processing are fulfilled. In case that you are entering into a contract where an entity from a third country (outside the territory of the EU) is one of the parties thereto, your personal data related to your employment may be provided to the third country exclusively for the purpose of fulfilment of the contract (contractual relationship).

YOUR PERSONAL DATA PROCESSED BY OUR COMPANY

Personal contact data – such as your name, surname, degree, residence address, private e-mail address, and private phone number;

Business contact data – such as the address of a company, place of work, business e-mail address, phone number, electronic signature;

Personal data – such as gender, marital status, date of birth, personal identification number (or national identification number), nationality, and photograph, achieved education;

Contractual data – such as the content of the employment contract;

Information about family members – such as emergency contact, and data on spouses and children for tax benefits;

Payment information – such as the bank account number and requests for reimbursement of expenses and payments;

Details of your work position – such as the name of your position, department, assignment, and responsibilities;

Information about remuneration, old – age pension scheme and other benefits – such as your wages, benefits agreed, a company vehicle provided to you, and the old-age pension scheme;

Details regarding hours worked, absence for various reasons (annual leave, incapacity for work (sick leave)) (impediments at work, e.g. visiting a doctor, visiting a doctor with a family

member, etc.) – such as your working time, entitlement to annual leave, and absence due to incapacity for work;

Information about education, training and career development – for example, information about your education and professional experience, any courses or training you have completed, or certificates you have obtained;

Performance and assessment – for example, the content of your performance assessment and numeric and other information related to your work performance;

Entrusted property – for example, the information on the Controller’s property that has been provided to you for use, such as a company cell phone, motor vehicle, computer or laptop, other pieces of property, values entrusted to you based on an agreement on material liability.

Correspondence and communication data – such as e-mail correspondence using the business e-mail address, Internet data transmissions, and IP address;

Digital access rights – such as your access rights to various applications within the Controller’s IT infrastructure;

Security information – such as your identification card number, information whether you are in the building, and the Controller’s surveillance system records (CCTV closed-circuit television);

Data for health service purposes – for example, information about health assessment on work ability

Data required for accident insurance purposes – such as your name and job position.

Phone call recording – if you work at:

- a call centre;
- dispatching (enterprise dispatching);
- a workplace where your line is recorded;

or if your calls to those lines have been answered.

Recordings of radio communication between radio stations – if you work at a department that uses radio stations provided by the Employer (e.g. a train trailer) to fulfil work tasks, the communication concerned is recorded for the purpose of checking or solving any events in relation to the performance of a particular task (e.g. shunting the railway carriages).

Data obtained through control operations – when fulfilling the Employer’s obligations in the field of HSE (health and safety at work, fire protection, major industrial accidents), we may also process your personal data connected with an informative breath test, identification and record-keeping of breaches of internal regulations including HSE regulations.

Data on contractual relationships – e.g. when entering into purchase and sale contracts where you are one of the parties thereto for instance in case of the sale of the Controller’s redundant property, we may process your personal data such as your name, surname, permanent residence address, account number.

Personal data connected with the compliance with policies and rules stipulated under the MOL Group’s Code of Ethics and Code of Business Conduct – for example, your name, surname, contact data, personal data arising from the content of a notice/report.

We will process your personal data that belong to a special category only for the purposes strictly connected with the proper performance of our obligations as your employer in the scope that is allowed or required by valid legislation (e.g. data on your health capacity to do your job, injuries etc.).

PURPOSE OF PROCESSING, THE LEGAL BASIS AND THE PERIOD FOR STORING PERSONAL DATA

Your personal data are processed for the purposes that are defined in detail in the Annex of this Privacy Notice intended for the Controller’s Employees, former Employees and their family members. The Annex provides all information in accordance with the Regulations and the Personal Data Protection Act, including the legal basis of processing and the period for storing personal data in a well-arranged and comprehensible way.

After the period for storing personal data elapses, your personal data will be eliminated (deleted) unless there is another legal reason to the processing thereof (exercise of legal claims, participation in lawsuits etc.).

DATA PROTECTION OFFICER

The safe processing of personal data and the compliance of the processing with the Regulation and the Personal Data Protection Act is supervised by the Data Protection Officer whom you may contact in the event of exercising your rights.

Contact details of the Data Protection Officer:

E-mail: zodpovednaosobagdpr@slovnaft.sk

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

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

The Regulation and the Act on Personal Data Protection contain detailed information on the Data Subject's rights to personal data protection, your possibilities of seeking a legal remedy and the restrictions thereof (especially Articles 15 - 22, 77, 79 and 82 of the Regulation, § 21-28, § 38 of the Act on Personal Data Protection). You can request information about the processing of personal data that concern you at any time, you can request the rectification and erasure of your personal data or the restriction of their processing, furthermore you can object to the data processing based on a legitimate interest and to the sending of direct marketing messages, and you have the right to data portability. The most important provisions are summarized below.

Right to information

If your personal data are processed by the Controller, the Controller must provide you with the information regarding the data concerning you – even without your special request thereof – including the main characteristics of the data processing such as a purpose, a legal basis for the processing and a time period for which the personal data will be stored, an identity and contact details of the Controller and its representative (where applicable) and of recipients of the personal data (in case of data transfer to third countries indicating also the adequate and appropriate guarantees), legitimate interests of the Controller and/or third parties in case of data processing based on a legitimate interest, and your data protection rights and your possibilities of seeking a legal remedy (including your right to lodge a complaint with the supervisory authority). In case of automated decision-making or profiling, the Data Subject must be informed about the logic involved as well as about the significance and envisaged consequences of such processing for the Data Subject in an understandable way. The Controller will provide you with the above-mentioned information by making the Privacy Notice available to you. The above-mentioned does not apply in the scope in which the Data Subject already has the information.

Right to 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, and, where that is the case, you have the right to access to the personal data and certain information related to the data processing such as the purpose of the data processing, categories of the personal data concerned, recipients or categories of recipients to whom your personal data will be provided, and recipients located in third countries or international organizations, an envisaged period for which the personal data will be stored and if that is not possible to be specified, the criteria for determining such a period, the Data Subject's data protection rights and possibilities of seeking a legal remedy (including its right to lodge a complaint with the supervisory authority), and the information on a source of personal data where the personal data are not collected from the Data Subject. Upon your request, the Controller shall provide a copy of your personal data undergoing the 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 gives you information on the possibility, the procedure, the potential costs and other details of providing the copy after receiving 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 form.

In case of automated decision-making or profiling, the Data Subject has access to the following information: the information about the logic involved, the significance and envisaged consequences of such processing for the Data Subject.

Right to rectification

You have the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning you. With regard to the purposes of the 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 has the obligation to erase personal data without undue delay where certain grounds or conditions are fulfilled. The grounds on which the Controller is obliged to erase your personal data upon your request are for example: The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw your consent on which the processing is based, and where there is no other legal ground for the processing; the personal data have been unlawfully processed, or you object to the processing, and there are no overriding legitimate grounds for the processing; the personal data have to be erased for compliance with a legal obligation in the laws of the Union or a Member State which the Controller is subject to or the personal data have been collected in relation to the offer of information society services.

In some cases, the Controller will not be able to satisfy your request; for example if the processing is necessary for exercising the right of freedom of expression and information; due to compliance with a legal obligation under which the processing is required by the laws of the Union or a Member State which the Controller is subject to or 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, 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 ground.

Where the processing has been restricted for the above-mentioned reasons, with the exception of storage, the personal data shall only be processed with your consent or to establish, exercise or defend legal claims or to protect the rights of another natural or legal person or due to an important public interest of the Union or a Member State.

You will be informed by the Controller before the restriction of processing 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 the performance of a contract (to which you are a party); and
- b) the processing is carried out by automated means.

When 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 right to data portability shall be without prejudice to the provisions governing the right to erasure. The right to data portability shall not adversely affect the rights and freedoms of others. The right to obtain a copy 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. 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.

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

Automated individual decision-making including profiling

You have the right not to be subject to a decision based exclusively on automated processing, including profiling that has legal consequences concerning or significantly affecting you. The afore mentioned shall not apply if the decision is necessary for making or fulfilling a contract between the Data Subject and the Controller, allowed by the laws of the Union or a Member State which the Controller is subject to, or based on the Data Subject's explicit consent.

Right to withdraw your consent at any time

Where processing is based on your consent, you have right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on the consent prior to its withdrawal. It shall be as easy to withdraw as to give consent.

You may deliver your withdrawal of consent to the address of registered seat of the Controller or to the data protection officer's e-mail or in the manner indicated in the granted consent.

Right to lodge a complaint with a supervisory authority

If you consider that the processing of personal data relating to you infringes the Regulation or Act on Personal Data Protection, you have the right to lodge a complaint with a supervisory authority situated especially in a member state of your usual residence, place of work or a place of alleged infringement.

Supervisory Authority in the Slovak Republic: 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, <https://dataprotection.gov.sk>.

Right to an effective judicial remedy

You shall have the right to an effective judicial remedy where you consider that your rights have been infringed as a result of the processing of your personal data in contradiction to the Regulation/Act on Personal Data Protection. Proceedings (an action) against a controller

may be brought before the courts of the Member State where the controller has an establishment or where you have your habitual residence (domicile).

Right to compensation and liability

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

The Controller involved in processing shall be liable for the damage caused by the processing which infringes the Regulation respectively the Act on Personal Data Protection (for damage caused by unlawful processing). The Controller shall be exempt from liability for the damage caused by the unlawful processing if it proves that it is not in any way responsible for the event giving rise to the damage (if the Controller has not caused the damage).

Purpose of processing – Processing		Legal basis to the processing	Categories of Data Subjects	Category of personal data	Period for storing personal data	Category of recipients
Selection of Employees	Selection of the Employees concerned. The selection is made through Taleo application (an application managed at the level of MOL Group); testing the qualification for the practice of profession	<p>A contractual and pre-contractual relationship in which the Data Subject is one of the parties (Article 6, Subarticle 1, Letter b) of the Regulation in connection with Act no. 311/2001 Coll. the Labour Code as amended).</p> <p>Consent to registration in Taleo (Article 6, Subarticle 1, Letter a) of the Regulation).</p> <p>Consent in case of recommendation (Article 6, Subarticle 1, Letter a) of the Regulation).</p>	Job seekers, employees (recommending their future colleague)	Common personal data	1 year as from the conclusion of selection	MOL Group, the Processor
Employment relationship	Fulfilling the Employer's obligations connected with an employment and similar relationship	<p>Statutory obligation (Article 6, Subarticle 1, Letter c) of the Regulation).</p> <ul style="list-style-type: none"> Act No. 311/2001 Coll. Labour Code as amended. Act no. 5/2004 Coll. on Employment Services and on amendments and supplements to certain acts as amended. <p>The contractual relationship in which the Data Subject is one of the parties (Article 6, Subarticle 1 Letter b) of the Regulation).</p>	Job seekers, employees, employees' husbands and wives, employees' dependent children, employees' children's parents, close persons, former employees	<ul style="list-style-type: none"> Common personal data A special category in connection with Article 9 Subarticle 2 Letter b) of the Regulation. <p>The processing is necessary for the purpose of fulfilling and performing the Controller's or the Data Subject's obligations and special rights in employment, social security and protection law (e.g. data on one's incapacity for work, important personal impediments at work, reduced capacity for work; the data may also contain data about your health).</p>	<p>Up to the maximum of 70 years of the employee's age but not earlier than 10 years after termination of the employment.</p> <p>Personal file of 1 - 4 level employees and significant employees to the company's history will be transferred to the archive after this period as a record of permanent documentary value.</p>	MOL Group, the Processor, employees, other authorized state authorities, if the data are provided based on a statutory obligation.

<p>Employment relationship</p>	<p>Fulfilling the Employer's obligations connected with the employment or similar relationship: violation of regulations and verification of inspection results, verifying a conflict of interests. Clean desk policy</p>	<p>Statutory obligation (Article 6, Subarticle 1, Letter c) of the Regulation), e.g.:</p> <ul style="list-style-type: none"> • Act No. 311/2001 Coll. the Labour Code, as amended; (e.g. Section 81; Section 224 Subsection 1 Letter c) and d), Section 82 Letter a) and f), Section 177 Subsection. 2, Section 83 of the Labour Code), • Act No. 124/2006 Coll. on Occupation Safety and Health and on amendments and supplements to certain acts as amended (e.g. Section 9 Subsection 1), Act no. 5/2004 Coll. on Employment Services and on amendments and supplements to certain acts as amended. <p>The contractual relationship in which the Data Subject is one of the parties (Article 6, Subarticle 1 Letter b) of the Regulation).</p>	<p>Employees, former employees</p>	<p>Common personal data Orientational value of alcohol content in exhaled breath, description of events</p>	<p>1 year after the year when a given matter investigated internally was concluded or after the given matter was lawfully concluded by a competent authority</p>	<p>The Police, competent administrative authorities, MOL Group, the Processor</p>
<p>Code of Ethics</p>	<p>Complying with the policies and rules laid down by the MOL Group's Code of Ethics and the Code of Business Conduct</p>	<p>The Controller's legitimate interest (Article 6, Subarticle 1, Letter f) of the Regulation)</p> <ul style="list-style-type: none"> • Ensuring the compliance with adopted ethical policies and rules laid down by the Code of Ethics is in the Controller's legitimate interest. 	<p>Employees, former employees, a person who has filed a complaint (a notifier)</p>	<ul style="list-style-type: none"> • Common personal data • A special category in connection with Article 9 Subarticle. 2 Letter b) of the Regulation. <p>The processing is necessary for the purpose of fulfilling and performing the Controller's or the Data Subject's obligations and special rights in employment, social security and protection law (e.g. data on working incapacity, important personal impediments at work, reduced capacity for work; the data may also contain data about your</p>	<p>60 days if the investigation is discontinued without identifying any violation of the Code of Ethics.</p> <p>24 months after the investigation is concluded if the Code of Ethics has been violated.</p>	<p>The Police, competent administrative authorities, the MOL Group's Ethics Committee, a reported person, a witness</p>

				health).		
Social Insurance Company	Fulfilling the Employer's obligations towards the Social Insurance Company	<p>Statutory obligation (Article 6, Subarticle 1 Letter c) of the Regulation)</p> <ul style="list-style-type: none"> • Act no. 461/2003 Coll. on Social Insurance as amended • Act no. 43/2004 Coll. on the Old-Age Pension Saving System • Act No. 650/2004 Coll. on the Supplementary Pension Scheme and on amendments and supplements to certain acts, as amended; • Act No. 426/2003 Coll. on Compensation for Earnings during an Employee's Temporary Incapacity for work and on amendments and supplements to certain acts, as amended; 	Employees, employees' husbands and wives, employees' dependent children, employees' children's parents, close persons, former employees.	Common personal data, data on the award of pension, data from an employment contract entered into with a supplementary pension insurance company, data on the drawing of maternity and parental leave	10 years	Social Insurance Company, MOL Group, the Processor
Health insurance	Fulfilling the Employer's obligations towards the health insurance companies	<p>Statutory obligation (Article 6, Subarticle 1 Letter c) of the Regulation).</p> <ul style="list-style-type: none"> • Act no. 580/2004 Coll. on Social Insurance and on amendments and supplements to Act no. 95/2002 Coll. on Insurance as amended. 	Employees, former employees	Common personal data	10 years	Health insurance companies, MOL Group, the Processor
HSE (BOZP, PO, PZS)	Fulfilling the Employer's obligations in health and safety at work, fire protection, work health-care service (BOZP, PO, PZS).	<p>Statutory obligation (Article 6, Subarticle 1 Letter c) of the Regulation).</p> <ul style="list-style-type: none"> • Act no. 124/2006 Coll. on Occupational Health and Safety and on amendments and supplements to certain acts as amended. • Act no. 355/2007 Coll. On Protection, Support and Development of Public Health as amended. 	Employees, former employees	<ul style="list-style-type: none"> • Common personal data • A special category in connection with Article 9 Subarticle 2 Letter b) of the Regulation. <p>The processing is necessary for the purpose of fulfilling and performing the Controller's or the Data Subject's obligations and special rights in employment, social security and protection law (e.g. data on working</p>	10 years after the obligation elapses or ceases to exist unless a longer time period arises from a special regulation.	An entity providing services under special acts, the Employer, MOL Group The Processor Authorized persons in line with valid legislation.

				incapacity, important personal impediments at work, reduced capacity for work; the data may also contain data about your health) <ul style="list-style-type: none"> • informative breath test • violation of regulations. 		
Injuries	Fulfilling the Employer's obligations in health and safety at work (BOZP, PZS)	Statutory obligation (Article 6, Subarticle 1 Letter c) of the Regulation). <ul style="list-style-type: none"> • Act no. 124/2006 Coll. on Occupational Health and Safety and on amendments and supplements to certain acts as amended. • Act no. 355/2007 Coll. On Protection, Support and Development of Public Health as amended. 	Employees, former employees	<ul style="list-style-type: none"> • Common personal data • A special category in connection with Article 9 Subarticle 2 Letter b) of the Regulation The processing is necessary for the purpose of fulfilling and performing the Controller's or the Data Subject's obligations and special rights in employment, social security and protection law (e.g. data on working incapacity, important personal impediments at work, reduced capacity for work; the data may also contain data about your health).	5 years after the obligation elapses or ceases to exist	An entity providing services under special acts, the Labour Inspectorate, the Employer, MOL Group
Taxes	Complying with tax obligations	Statutory obligation (Article 6, Subarticle 1, Letter c) of the Regulation). <ul style="list-style-type: none"> • Act no. 595/2003 Coll. on Income Tax as amended. 	Employees, former employees	Common personal data, data about income	10 years	The Tax Authority, MOL Group, the Processor
GPS vehicles	Complying with tax obligations and ensuring the protection of property	Statutory obligation (Article 6, Subarticle 1, Letter c) of the Regulation). <ul style="list-style-type: none"> • Ensuring the monitoring of a ride in order to prevent and identify risks within HSE obligations (risky methods, risk control) and protect 	Employees, former employees	Localization data in the form of a journey logbook generated by devices of the satellite system for monitoring of the operation of vehicles.	5 years	The Tax Authority, MOL Group, the Processor

		the Employer's property which is a company vehicle against abuse or theft, and in order to defend the Company's financial interests with regard to Section 19, Subsection. 2 of Act no. 595/2003 Coll on Income Tax as amended.				
Social policy	The Employer's social policy including the provision of benefits	<p>Statutory obligation (Article 6, Subarticle 1, Letter c) of the Regulation).</p> <ul style="list-style-type: none"> • Act No. 311/2001 Coll. Labour Code as amended (for example, recreational vouchers). • Act no. 650/2004 Coll. on the Supplementary Pension Saving System and on amendments and supplements to certain acts as amended. • Act No. 152/1994 Coll. on the Social Fund and on amendments and supplements to Act No. 286/1992 Coll. on Income Taxes, as amended; <p>The Data Subject's consent (Article 6, Subarticle 1, Letter a) of the Regulation).</p> <p>A contract to which the Data Subject is one of the parties, a collective agreement (Article 6, Subarticle 1 Letter b) of the Regulation).</p>	Employees, family members and persons close to the Employee, former Employees	Common personal data	5 years	Third parties participating in the implementation of benefits (e.g. sports centres, accommodation, wellness stays); MOL Group, the Processor

<p>Wage policy</p>	<p>Implementing the Employer's wage policy</p>	<p>Statutory obligation (Article 6, Subarticle 1 Letter c) of the Regulation).</p> <ul style="list-style-type: none"> • Act no. 311/2001 Coll. Labour Code as amended • Act no. 580/2004 Coll. on Health Insurance and on amendments and supplements to Act no. 95/2002 Coll. on Insurance and on amendments and supplements to certain acts as amended. • Act no. 461/2003 Coll. on social Insurance as amended. • Act no. 595/2003 Coll. on Income Tax as amended. • Act no. 43/2004 Coll. on the Old-Age Pension Saving System and on amendments and supplements to certain acts as amended. • Act no. 650/2004 Coll. on the Supplementary Pension Saving System and on amendments and supplements to certain acts as amended. • Act no. 5/2004 Coll. On Employment Services and on amendments and supplements to certain acts as amended. • Act no. 462/2003 Coll. on Compensation for Earnings during an Employee's Temporary Incapacity for Work on amendments and supplements to certain acts as amended. • Act no. 152/1994 Coll. on the Social Fund and on amendments and supplements to Act no. 286/1992 Coll. on Income Taxes as amended. 	<p>Employees, employees' husbands and wives, employees' dependent children, employees' children's parents, close persons, former employees.</p>	<ul style="list-style-type: none"> • Common personal data, e.g. identification data, wage, salary or payment terms and conditions, data on the time worked-off, sums affected by a decision adopted by a competent court or administrative authority, financial punishments and fines, compensations imposed on the Employee by valid decisions of competent courts, a date of the commencement of work, data on dependent children, data on the drawing of maternal and parental leave, data on the award of pension, a type of pension, amount of the Employee's and the Employer's contribution to a supplementary pension insurance company. • A special category related to Article 9 Subarticle 2 Letter b) of the Regulation. The processing is necessary to fulfil and perform the Controller or the Data Subject's obligations and special rights under employment, social security and protection law (e.g. data on one's incapacity for work, important personal impediments at work, reduced capacity for work; the data may also contain data about your health) 	<p>The maximum of 50 years</p>	<p>Health insurance companies, the Social Insurance Company, the Tax Authority, DDS (supplementary pension saving system), MOL Group, the Processor</p>
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<p>Collective employment relationships</p>	<p>Fulfilling the Employer's obligations in managing collective employment relationships.</p>	<p>Statutory obligation (Article 6, Subarticle 1, Letter c) of the Regulation).</p> <ul style="list-style-type: none"> • Act no. 152/1994 Coll. on the Social Fund and on amendments and supplements to Act no. 286/1992 Coll. on Income Taxes as amended. • Section 229 up to Section 250a of Act no. 311/2001 Coll. Labour Code as amended. • Act no. 2/1991 Coll. on Collective Bargaining as amended and a Collective Agreement. 	<p>Employees who are members of labour union.</p>	<ul style="list-style-type: none"> • Common personal data • A special category in connection with Article 9 Subarticle 2 Letter b) of the Regulation. <p>The processing is necessary for the purpose of fulfilling and performing the Controller's or the Data Subject's obligations and special rights in employment, social security and protection law (e.g. data on one's incapacity for work, important personal impediments at work, reduced capacity for work; the data may also contain data about your health).</p>	<p>5 years</p>	<p>Representatives of the Employees</p>
<p>Collective employment relationships</p>	<p>Fulfilling the Employer's obligations in managing collective employment relationships.</p>	<p>Statutory obligation (Article 6, Subarticle 1, Letter c) of the Regulation).</p> <ul style="list-style-type: none"> • Act no. 152/1994 Coll. on the Social Fund and on amendments and supplements to Act no. 286/1992 Coll. on Income Taxes as amended. • Section 229 up to Section 250a of Act no. 311/2001 Coll. Labour Code as amended. • Act no. 2/1991 Coll. on Collective Bargaining and a Collective Agreement. 	<p>Employees and former Employees who are a subject-matter of bargaining with the labour union.</p>	<ul style="list-style-type: none"> • Common personal data • A special category in connection with Art. 9 Subarticle 2 Letter b) of the Regulation. <p>The processing is necessary for the purpose of fulfilling and performing the Controller's or the Data Subject's obligations and special rights in employment, social security and protection law (e.g. data on one's incapacity for work, important personal impediments at work, reduced capacity for work; the data may also contain data about your health).</p>	<p>10 years</p>	<p>Representatives of the Employees</p>

<p>Photographs and videos</p>	<p>Taking and publishing photos and making audio-visual recordings at social and other events and during various activities; a photo used within communication systems (e.g. Panorama Magazine, Facebook, Intranet, Outlook)</p>	<p>The Controller's legitimate interest (Article 6, Subarticle 1 Letter f of the Regulation).</p> <ul style="list-style-type: none"> • Building the Company's good reputation, contributing to its economic growth within the company culture and documenting the Company's historical activity is in the Company's legitimate interest. <p>The Data Subject's consent (Article 6, Subarticle 1, Letter a) of the Regulation).</p>	<p>Employees, the Employee's family members and close persons, other persons moving within the premises where photos are being taken and video recordings made.</p>	<p>Common personal data. One's image in a picture format (a photo, a video).</p>	<p>For duration of the Controller's legitimate interest.</p> <p>Published for 60 days from the event.</p> <p>For a period indicated in the consent, usually for 2 up to 5 years.</p>	<p>To be published, MOL Group, the Processor.</p>
<p>Human resources development</p>	<p>Providing the Employees with education in languages, leadership and soft skills; initiation education.</p>	<p>Statutory obligation (Article 6, Subarticle 1 Letter c) of the Regulation).</p> <ul style="list-style-type: none"> • Act no. 311/2001 Coll. Labour Code as amended. • Act no. 650/2004 Coll. on the Supplementary Pension Saving System and on amendments and supplements to certain acts as amended. • Act no. 152/1994 Coll. on the Social Fund and on amendments and supplements to Act no. 286/1992 Coll. on Income Taxes as amended. <p>The Data Subject's consent (Article 6, Subarticle 1, Letter a) of the Regulation).</p>	<p>Employees, former employees</p>	<p>Common personal data</p>	<p>5 years after the purpose of processing ceases to exist.</p>	<p>An entity participating in providing the support, education. MOL Group, the Processor.</p>
<p>Human resources development</p>	<p>Providing pupils, elementary and high school students, university students with support and education, including the provision of scholarships and organization of various competitions to support</p>	<p>The Data Subject's Consent (Article 6 Subarticle 1 Letter a) of the Regulation).</p> <p>A contract to which the Data Subject is one of the parties (Article 6 Subarticle 1 Letter b) of the Regulation).</p>	<p>Children (pupils), high school and university students, legal representatives</p>	<p>Common personal data</p>	<p>The maximum of 10 years</p>	<p>An entity participating in providing the support, education. MOL Group, the Processor.</p>

	vocational training and education of future professionals.					
Contact data	Processing the Employees' contact personal data for the purpose of complying with duties	<p>Legitimate interest (Article 6 Subarticle 1 Letter f) of the Regulation).</p> <ul style="list-style-type: none"> The processing of contact data, including the Employees' contact data in connection with Section 78 Subsection. 3 of the Act on Personal Data Protection is in the Controller's legitimate interest. 	Employees, former employees	Common personal data	<p>For duration of a contractual relationship and 10 years after it ceases to exist.</p> <p>For a time period for which the Data Subject acts as a contact person.</p>	<p>To be published. Entities with who communication is ensured.</p> <p>Contractual partners, MOL Group, safety representatives of the Employees.</p>
Management of the Registry	Having and managing the Registry	<p>Statutory obligation (Article 6, Subarticle 1 Letter c) of the Regulation).</p> <ul style="list-style-type: none"> Act no. 395/2002 Coll. on Occupational Health and Safety and on amendments and supplements to certain acts as amended. Act no. 305/2013 Coll. on electronic form of exercising the authority of public organs and on amendments and supplements to certain acts (e-Government Act) as amended. 	Job seekers, employees, employees' husbands and wives, employees' dependent children, employees' children's parents, close persons, former employees.	<ul style="list-style-type: none"> Common personal data A special category in connection with Article 9 Subarticle 2 Letter b) of the Regulation. <p>The processing is necessary for the purpose of fulfilling and performing the Controller's or the Data Subject's obligations and special rights in employment, social security and protection law (e.g. data on one's incapacity for work, important personal impediments at work, reduced capacity for work; the data may also contain data about your health).</p>	Stipulated by special regulations (in accordance with the Controller's effective Registry Order and Registry Plan).	Ministry of Interior of the Slovak Republic, other authorized entity, the Processor, MOL Group.
Complaints	Investigating complaints under Act No. 54/2019 Coll. on the Protection of Notifiers of Anti-Social Activities and on amendment and supplementation of certain acts.	<p>Statutory Obligation (Article 6, Subsection. 1 Letter c) of the Regulation).</p> <ul style="list-style-type: none"> Act No. 54/2019 Coll. on the Protection of Notifiers of Anti-Social Activities and on amendment and supplementation of certain acts. 	Participants to the proceeding.	Common personal data relevant for investigating the complaint.	3 years	The Office for the Protection of Notifiers of Anti-Social Activities, the Police, the Public Prosecutor's Office, a competent administrative

						authority, participants to the proceeding, MOL Group.
Network and object security	Network and object security including protection ensured by a surveillance system	<p>Legitimate interest (Article 6, Subarticle 1, Letter f) of the Regulation).</p> <ul style="list-style-type: none"> • Adopting appropriate security measures to prevent the unlawful processing of personal data and other information that has to be protected in the Controller’s environment is the Controller’s legitimate interest and obligation arising from the Regulation. <p>We provide you with the IT equipment and services you need to perform your duties for the Company, such as a Company mobile phone or e- mail account. For us to be able to do so, the Company must process your personal data. Communication/IT monitoring. We will monitor communications and network use to secure our IT environment and network infrastructure (the fulfilment of the Controller’s obligation to ensure the protection of personal data, in particular, their integrity, confidentiality and accessibility, and to prevent undesired impacts on the rights and freedoms of data subjects) and whether our employees use these facilities in a manner consistent with applicable legal regulations and the Controller’s internal rules.</p>	Employees, former employees	Common personal data (e.g. access data to various accounts, a cell phone and data connected with IT services), recordings made by security cameras.	1 year Camera recording: 15 days.	MOL Group, the Processor

Call centre	Recording phone calls	<p>Legitimate interest (Article 6, Subarticle 1 Letter f) of the Regulation).</p> <ul style="list-style-type: none"> Recording phone calls is in the Controller's legitimate interest for the purpose of assessing and enhancing the quality of services provided, handling and keeping records of offers, receiving demands, submitting offers, handling and keeping records of warranty claims on received goods or services, keeping records of complaints and damage events of the Company's customers. 	Employees, customers.	Recording of a phone call and data stated during the call.	12 immediately subsequent months from the record of the phone call.	
Dispatching	Recording phone calls	<p>Legitimate interest (Article 6, Subarticle 1, Letter f) of the Regulation).</p> <ul style="list-style-type: none"> Having an evidence to solve critical situations and states and recording facts stated during a phone call for that purpose is in the Controller's legitimate interest. 	Dispatching employees or operators of the line that is being recorded, persons making phone calls to the lines that are being recorded if the persons are employees.	Recording of a phone call and data stated during the call.	12 immediately subsequent months from the record of the phone call.	The Police, the Fire and Rescue Service, other competent authorities investigating emergency situations.
Radio stations	Recording radio communication between radio stations	<p>Legitimate interest (Article 6, Subarticle 1, Letter f) of the Regulation).</p> <ul style="list-style-type: none"> The control over or solution of events related to the performance of specific work (e.g. shunting the train trailers) is in the Controller's Legitimate interest. 	Employees who have been assigned a radio station to fulfil their tasks.	Recording of a phone call and data stated during the call.	6 immediately subsequent months from the record of the phone call.	In the event of a crisis situation, states, accidents, injuries: The Police, the Fire and Rescue Service, the Labour Inspectorate and other competent administrative authorities.
Rescuing	Rescuing persons for the purpose of economic mobilization	<p>Statutory obligation (Article 6, Subarticle 1 Letter c) of the Regulation and Section 13 Subsection. 1 Letter e) of the Act on Personal Data Protection).</p> <ul style="list-style-type: none"> Act no. 179/2011 Coll. on Economic 	Employees, former employees	Common personal data	2 years	Ministry of Economy of the SR

		<p>Mobilization and on amendments and supplements to Act no. 387/2002 Coll. On the Management of the State in Crisis Situations Other than Time of War and State of War as amended as amended.</p> <p>In the event that you are removed from the records for the purpose of economic mobilization to fulfil tasks, your personal data will be being recorded by the Controller and provided to the system JISHM EPSIS by the Controller.</p>				
Data Subjects	Handling requests made by Data Subjects exercising their rights	<p>Statutory obligation (Article 6, Subarticle 1 Letter c) of the Regulation).</p> <ul style="list-style-type: none"> • Act on Personal Data Protection • the Regulation. 	Persons who will use their rights (to rectification, erasure, information on the processing of personal data etc.) in line with the Regulation.	Usually, common personal data. Belonging to a special category only in case that the special category is the subject-matter of the request and applies to a given processing operation.	5 years	Office for the Protection of Personal Data of the SR
Contractual Relationships	Entering into contracts (e.g. purchase and sales contracts when selling the Company's redundant property to the Data Subject)	The contractual and pre-contractual relationship in which the Data Subject is one of the parties thereto (Article 6, Subarticle 1 Letter b) of the Regulation).	Employees, former employees.	Common personal data (a bank account in case of payments made by wireless transfer)	For duration of a contractual relationship and 10 years after it ceases to exist.	Parties to a contract

<p>Legal proceedings / extrajudicial debt recovery / Enforcement proceedings</p>	<p>Processing of personal data for the purposes of legal proceedings, extrajudicial debt recovery, dispute resolution by the company (active and passive disputes), execution and related proving, asserting and / or defending of the company's legal claims</p>	<p>Legitimate interest (Article 6, Subarticle 1 Letter f) of the Regulation)</p> <ul style="list-style-type: none"> • it is in the legitimate interest of the Controller to process personal data in order to protect its legal claims, to prove, assert and / or defend them if it is forced to enter into court, enforcement proceedings, ensure extrajudicial debt recovery. 	<p>Employees, former employees.</p>	<p>Common personal data.</p> <p>A special categories of personal data only if it is subject of the relevant proceedings.</p> <p>In particular, identification and contact personal data, or transaction data, are processed, but if it is necessary for the given purpose of asserting and defending the Controller's claims, the Controller will also process other personal data related to the given purpose.</p>	<p>10 years from the final termination of the court proceedings, extrajudicial debt recovery or enforcement proceedings. The retention period begins to run on the first day of the year following the year in which the legal proceedings, extrajudicial debt recovery or enforcement proceedings were lawfully terminated.</p>	<p>Police, public prosecutor's office, competent administrative authority, participants in the proceedings, relevant Executor, courts</p>
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