

PRIVACY NOTICE (GENERAL INFORMATION)

The controller SLOVNAFT, a. s., Vlčie hrdlo 1, 824 12 Bratislava, Identification No.: 31 322 832, registered in the Commercial Register of the District Court Bratislava I, Section: Sa, Insert No.: 426/B (hereinafter only referred to as “the Company” or “the Controller”), complying with the Regulation¹ and the Act on Personal Data Protection², processes your personal data within the scope and under the conditions defined by special regulations.

This Privacy notice provides basic information regarding your rights in the course of processing of personal data by the Company and information on access to personal data.

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

Suggestions, Complaints, Customer Claims and Damage Events

Based on the pre-contractual and contractual relation to which you are a party in terms of Article 6(1) letter (b) of the Regulation, and also on the basis of the Company’s legitimate interest in terms of Article 6(1) letter (f) of the Regulation, we process your personal data in order to solve and settle your suggestions, complaints, customer claims and damage events (including insured events) in case you are or have been a customer of any petrol (service) station of the Company, or if you have sent the Company any suggestion or complaint (does not pertain to the resolution of suggestions, complaints and claims filed by BONUS Club members). We process your personal data in the course of settlement of such suggestions, complains, customer claims and damage events and thereafter for a period of 5 years from the end of the calendar year in which the suggestion, complaint, customer claim or damage event was settled, for archiving purposes.

Personalized Fuel Cards

Based on a contract with a legal entity or natural entity – entrepreneur (hereinafter only referred to as “other company”), the Company may process your personal data in terms of Article 6(1) letter (b) of the Regulation, if such other company requests the issue of a personalized fuel card. In such case, the Company obtains your personal data from such other company and only processes them to the extent necessary in order to ensure the issue of the personalized fuel card (printing the card). The controller (other company) who has obtained the personal data from you is obliged to provide all relevant information regarding processing of your personal data for this purpose. Your personal data are processed by the Company as part of the order when issuing and printing the personalized fuel card. The Company is not

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.

interested in further processing of your personal data for any purpose defined by the Company.

Supplier-Customer Relationships

Based on the pre-contractual and contractual relation to which you are a party in terms of Article 6(1) letter (b) of the Regulation, and also on the basis of the Company's legitimate interest in terms of Article 6(1) letter (f) of the Regulation, we process your personal data in particular as part of supplier and customer contracts. We obtain your personal data either directly from you, if you are a person authorized to act on behalf of the company with which we enter into a contractual relationship, or from your employer as data necessary to ensure the contact in connection with performance of the contract. As part of the contractual relationship and in compliance with the contract, the controller performs inspection activities in the field of health and safety at work, fire protection and health training of the supplier's employee. In this connection, your personal data as the employee data are processed in the course of documentation of inspection activities and resolution of shortcomings and events detected by such inspection. Your personal data are stored while the contractual relationship lasts and thereafter for a period of 10 years after expiry of the contract, for archiving purposes.

Bookkeeping

We also process your personal information in order to meet the Company's bookkeeping obligations in terms of Article 6(1) letter (c) of the Regulation (in particular the obligations imposed by Act No. 431/2002 Coll. on Accounting as amended, Act No. 222/2004 Coll. on Value Added Tax as amended). Your personal data included in accounting records/invoices are stored for a period of 10 years following the year to which such accounting records/invoices pertain.

Registry Administration and Postal Records

We may also process your personal data for the purpose of registry administration and keeping postal records (mail registration) as part of statutory obligations of the Company as the Controller which result from specific legal regulations in terms of Article 6(1) letter (c) of the Regulation (in particular obligations imposed by Act No. 395/2002 Coll. on Archives and Registries and on amendment of certain acts as amended, Act No. 305/2013 Coll. on the Electronic Form of Governance Conducted by Public Authorities and on amendments and supplements to certain acts (e-Government Act) as amended). Storage (retention) periods are set out by special regulations.

Court Proceedings

We may also process your personal data in order to resolve any dispute agenda of the Company (active and passive disputes) and to prove, exercise and/or defend any legal claims of the Company. The legal basis for processing of personal data for the purpose above is the legitimate interest of the Company (Article 6(1) letter (f) of the Regulation). We storage your personal data for a period of 10 years from valid settlement of the relevant court proceedings.

The storage (retention) period commences on the first day of the year following the year in which the court proceedings were validly resolved.

Bailiff (Execution) Proceedings

We may also process your personal data for bailiff (execution) proceedings and related demonstration, exercise and/or defence of legal claims of the Company. The legal basis for processing of personal data for the purpose above is the legitimate interest of the Company in case the Company acts as a party with legitimate interests (Article 6(1) letter (f) of the Regulation) in such bailiff proceedings. If the Company acts as a liable party or a third person who is obliged to provide assistance in the course of bailiff proceedings, the legal basis for processing of personal data is the performance of a legal obligation of the Company as the controller which is imposed on the Company as the controller by the Bailiff Court Procedure³ (Article 6(1) letter (c) of the Regulation).

We store your personal data for a period of 10 years from valid resolution of the bailiff proceedings. The storage (retention) period commences on the first day of the year following the year in which the bailiff proceedings were validly resolved.

Your personal data may be also provided to persons authorized in terms of relevant legal regulations (e.g. attorneys, notaries).

After expiry of the periods for storing personal data as defined above, the personal data shall be destroyed (deleted), unless there are any additional legal grounds for their processing (exercise of legal claims, for purposes of litigation, administrative proceedings, etc.).

Candidates for Operating of Petrol (Service) Stations

We process personal data based on the interest you have shown in our offer to register your data in the Company in order to become a partner of the service station (hereinafter only referred to as "SeS") in the future, based on a contract on commercial cooperation in the course of operation of a service station (hereinafter also referred to as "the contract"), the subject-matter of which consists of ensuring due operation of the SeS and performance of related activities. The purpose is the need to create, maintain and update registry of applicants interested in operation of the SeS (hereinafter only referred to as "the candidate") to ensure the ability to promptly replace an SeS partner in case of termination of cooperation with an existing SeS partner and ensure his replacement with an candidate, taking into account its experience, skills, practice and territorial requirement. The legal basis for processing of personal data for the purpose mentioned above is the consent given by the data subject (Article 6(1) letter (a) of the Regulation).

Inclusion in such registry does not establish a legal entitlement of the candidate to be invited by the Company to enter into a relevant contract in the future. If such contract is concluded,

³ Act No. 233/1995 Coll. on Court Bailiffs and Bailiff Procedures (Bailiff Court Procedure) and on amendment and supplementation of certain acts as amended

the Company will process personal data in terms of Article 6(1) letter (b) of the Regulation, when the 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.

We shall store personal data for a period of 2 years from their acquirement. After expiry of this period, the personal data shall be destroyed (deleted), unless there are any additional legal grounds for their processing (conclusion of a contract on commercial cooperation in the course of operation of a service station).

Other

You can find more detailed information regarding processing of personal data by the Company as the Controller for further purposes not mentioned in this Privacy notice in individual Privacy notices depending on the purposes of processing which are available at the Company's website www.slovnaft.sk, About us, link to Privacy Policy Documents.

RULES ON PERSONAL DATA PROTECTION

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

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.

The Company as the Controller has the legal obligation to provide your personal data in the course of inspection, supervisory activities or at the request of authorized authorities or institutions of the state, if so prescribed by special regulation⁴.

The Company may also provide your personal data to recipients who are also processors. The Company declares that it has duly executed contracts with its processors who ensure an appropriate level of personal data protection in compliance with legal regulations related to personal data protection. The list of processors processing personal data on behalf of the controller (the Company) is published and updated on the Company's website www.slovnaft.sk, About us, link to Personal Data Protection.

Your personal data may also be further provided to the company MOL Nyrt., with registered office at Október huszonharmadika ul. 18., Budapest, the Republic of Hungary for internal administrative purposes within the MOL Group.

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 to fulfil the purpose of processing. Your personal data shall be only accessible to persons entrusted by the Controller

⁴ For example, Act No. 171/1993 Coll. on the Police Force as amended; Act No. 18/2018 Coll. on Personal Data Protection and on Amendment and Supplementation of Certain Acts.

with personal data processing who process such data upon instructions issued by the Controller and in compliance with the Controller's security policy.

Your personal data are backed up in compliance with the Controller's retention rules. Your personal data shall be fully deleted from back-up data storage site as soon as possible in accordance with the retention rules. The purpose of personal data stored at back-up data storage sites is to prevent security incidents, in particular impaired data availability due to a security incident. The Company is obliged to ensure data back-up in compliance with the security requirements in the Regulation and the Act on Personal Data Protection.

Your personal data processed for purposes described in this Privacy notice are not subject to automated decision-taking including profiling and we do not publish your personal data or transfer them to third countries or international organizations.

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: Entry Net, s.r.o.
E-mail: zodpovednaosobagdpr@slovnaft.sk
Address for correspondence: GDPR Data Protection Officer, SLOVNAFT, a.s., Vlčie hrdlo 1, 824 12 Bratislava

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

Right of access

You have the right to obtain a copy of personal data we hold about you and information on how we use your personal data.

In most cases, you will receive your personal data in the form of a written document, unless you request a different form of provision. If you requested provision of such information using electronic means, data shall be provided to you electronically, if technically feasible.

Right to rectification

We take appropriate measures to ensure accuracy, completeness and timeliness of the data we hold about you. If you think that the data we hold about you are inaccurate, incomplete or out of date, please do not hesitate to ask us for their modification, update or supplementation.

Right to erasure

You have the right to ask us for erasure of your personal data, for example if data we obtained about you are no longer necessary for the fulfilment of the original purpose of processing. However, your right has to be evaluated in terms of all relevant aspects. For example, we may

have certain legal and regulatory obligations, which might mean that we will not be able to satisfy your request.

Right to restriction of processing

Under certain circumstances, you may request that we stop using your personal data. This includes cases when you may think that the personal data we hold about you may be inaccurate or that we no longer need to use your personal data.

Right to data portability

Under certain circumstances, you have the right to request that we transfer the data you provided to us to a third party of your choice. However, the right to portability only relates to personal data which we obtained upon consent or based on a contract to which you are a party.

Right to object

You have the right to object to data processing which is based on our legitimate and lawful interests. If we do not have a convincing legitimate and lawful interest in processing and you file an objection, we will not continue processing your personal data.

Right to withdraw consent at any time

If you have granted your consent with processing of your personal data for a specific purpose, we are obliged to observe such purpose and may not change it in the course of processing. You may withdraw your consent at any time. You may deliver your withdrawal of consent to the address of the controller or data protection officer.

Right to lodge a complaint

If you want to lodge a complaint regarding the way in which your personal data are processing, including exercise of the rights mentioned above, you may contact our data protection officer. All your suggestions and complaints will be carefully examined.

If you are not satisfied with our response or think that we process your personal data in an unfair or illegal manner, you may file a complaint to the supervisory authority, namely 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.

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 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.