

PRIVACY NOTICE
concerning processing operations related to the care of the SLOVNAFT, a.s. retail customer/data subject
(hereafter referred to as “Privacy Notice”)

| Description and the purpose of the processing of personal data | Legal basis of the processing of personal data | Scope of the processed personal data and their source | Period of personal data processing | Addressee of personal data transfer | Data processor and its activity |
|--|---|--|---|-------------------------------------|--|
| <p>Recording of telephone calls with the Customer Service of SLOVNAFT, a.s. (hereinafter referred to as "Company" or "Data Controller")</p> | <p>Article 6 (1) (a) of the GDPR¹ (consent of the customer/data subject).</p> <p>The customer/data subject grants consent by pressing the appropriate button or by continuing the call after hearing relevant brief information at the beginning of the call.</p> <p>The customer/data subject shall have the right to withdraw his or her consent at any time. Withdrawal of consent shall not affect the lawfulness of processing based on consent granted prior to the withdrawal.</p> <p>If the customer/data subject does not consent to the recording of the call, other communication channels are available.</p> | <p>Audio recordings of incoming and outgoing telephone calls to and from the Customer Service. The recordings capture the voice of customers, the voice of other data subjects who are not considered as customers, and Customer Service staff.</p> <p>In addition, the following data is recorded when making notifications: Name (name and surname), address, telephone number, email address, details of the notification, Slovnaft Move Card number (in case of Slovnaft Move programme (hereinafter referred to as "Slovnaft Move") member, if available), details required</p> | <p>Until the customer/data subject withdraws the consent, otherwise the Data Controller retain the specific audio recordings and related personal data for a period of 12 months.</p> | | <p>MOL IT & Digital GBS Slovakia, s. r. o., (Vlčie hrdlo 1, Bratislava 824 12, Slovak republic);</p> <p>Tasks: management of audio recordings created by the Customer Service.</p> <p>The list of other data processors is published at: www.slovnaftmove.sk</p> |

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) (hereafter referred to as “GDPR”)

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| | | for payment of any compensation (bank account number), details of the vehicle in the event of damage to the vehicle, and any other data communicated and necessary to resolve the process. | | | |
| <p>Communication with customers (consumers) through written or electronic correspondence (e-mail, Slovnaft Move Application, form published on the Slovnaft Move website and so on) or in person, answering questions, providing data, sending feedback to the Company and handling reports of product defects and service-related complaints.</p> | <p>Article 6 (1) (c) of the GDPR (processing is necessary for compliance with legal obligations).</p> <p>For example: the Consumer Protection Act.</p> | <p>Name (name and surname), e-mail address and Slovnaft Move Card number (if it is related to Slovnaft Move), case-related data.</p> <p>Data source: obtained from the customer (consumer).</p> | <p>During the time periods set by specific laws (f. e. Act No. 431/2002 Accounting Act as amended).</p> | | <p>The list of data processors is published at: www.slovnaftmove.sk</p> |
| <p>Communication with data subjects which are considered as non-customers through written or electronic correspondence (f. e. e-mails), answering questions, providing data, sending feedback to the Company.</p> | <p>Article 6 (1) (a) of the GDPR (consent of the data subject).</p> <p>This consent is given by the data subject by sending the enquiry and the data contained therein; this applies to the scope of the data which are requested and are related to responding to the enquiry and when dealing with any requests made in the enquiry</p> | <p>Name (name and surname), address, telephone number, e-mail address, details of the administration data necessary for the payment of any compensation (bank account number), details of the vehicle in the event of damage to the vehicle, as well as other</p> | <p>Until the data subject withdraws the consent or during the time periods set by specific laws (f. e. Act No. 431/2002 Accounting Act as amended).</p> | | <p>The list of data processors is published at: www.slovnaftmove.sk</p> |

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| | (e.g. enquiry regarding to providing information). The data subject shall have the right to withdraw his or her consent at any time. | data included in the enquiry/ case-related data. | | | |
| Elaboration of records regarding to the found objects and returning of the found objects to their owners. | Article 6 (1) (c) of the GDPR (processing is necessary for compliance with legal obligations). The finder shall take all reasonable steps to return the found object to its owner and shall hand over the found object to its owner or to a member of the police force, depending on the location where it was found. | Contact details of the involved persons and any other personal details revealed in the identification of the found object(s). | For a period of 12 months from the resolution or discovery of the found object. | | The list of data processors is published at: www.slovnaftmove.sk |
| Prevention, detection and investigation of fraud and abuse concerning the customer services. For the prevention and investigation of fraudulent acts and abuse, the Company Code of Ethics apply which is available at: https://slovnaft.sk/en/about-us/ethics/ | Article 6 (1) (f) of the GDPR (processing is necessary for the legitimate interests of the Company: to prevent and detect misconduct, which may endanger the Company's assets, trade secrets, intellectual property rights and business reputation, the proper working environment (based on respect, free of anxiety and retaliation); determining the liability of the relevant persons.). | Name (name and surname), Slovnaft Move Card number (in case of Slovnaft Move member), Slovnaft Move Card usage data, data generated during the investigation. Company is processing the data necessary for the investigation, e.g. Slovnaft Move Card number with other "invoice data" (e.g. name, article number quantity, price of the | If the report is not substantiated on the basis of the investigation or no further action is required, the data relating to the report shall be deleted within 60 days of the completion of the investigation. If measures are taken as a result of the investigation, | | The list of data processors is published at: www.slovnaftmove.sk |

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| | Legitimate interest balancing test has been conducted. | <p>product(s), purchase place and time etc.) to detect and investigate potential misuse (not only of the Slovnaft Move Card), until it is necessary for the purpose of the investigation.</p> <p>Data source: from the customer/data subject or from any report on the customer/data subject or the related procedure.</p> | including measures relating to the initiation of legal proceedings or disciplinary measures taken against the reporting person, the data relating to the report may be processed at the latest in the reporting system of the Data Controller until the proceedings have been concluded. | | |
| <p>Exercise of legal claims by the Company.</p> <p>This includes e.g. defence in legal disputes, out-of-court procedures and procedures of authority initiated by the customers.</p> <p>We provide information in a separate privacy notice, namely:</p> <p>i) PRIVACY NOTICE (GENERAL INFORMATION), and</p> <p>ii) PRIVACY NOTICE concerning processing operations related to the Slovnaft Move programme, published at:</p> | The provisions of the separate privacy notices are applied. | | | | |

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| https://slovnaft.sk/en/about-us/privacy-policy-documents/ . | | | | | |

Name, registered seat, telephone number, website (where the privacy notice is available) and email address of the Company as the Data Controller:

SLOVNAFT, a.s.
 Vlčie hrdlo 1
 824 12 Bratislava
 Slovak republic
 +421 2 4055 1111
 Company registry number: 31 322 832
www.slovnaft.sk
info@slovnaft.sk

The Company is a sole Data Controller whereby it determines the purpose and the scope of the data processing individually and it is liable only for its own data processing activity.

In addition to the above, under Article 6(1)(f) of GDPR (based on the legitimate interest of the Company), the Company uses the services of its lawyer partners to manage and successfully exercise its claims and transfers the required personal data to such lawyer partners for this purpose. Such lawyer partners act as independent controllers in accordance with the provisions of their own privacy notices. In case of engagement of lawyer partners for their specific case, and at the request of the individual, the Company shall provide information on the lawyer partner involved in a particular data processing operation, as well as the contact details and activities of that lawyer partner and the data processed in connection therewith.

Name and contact details of the Data Protection Officer as the Data Controller:

The Data Controller has appointed a Data Protection Officer in accordance with Article 37 of GDPR and the contact details are as follows:

E-mail address: zodpovednaosobagdpr@slovnaft.sk

Address for correspondence: zodpovedná osoba GDPR, SLOVNAFT, a.s., Vlčie hrdlo 1, 824 12 Bratislava

Persons who are authorised to access data at the Data Controller:

Your personal data will be processed only by a small team of authorised persons authorised by the Data Controller.

Processing special personal data for the purpose defined in this Privacy Notice

We do not process any special personal data with respect to you.

Transfer of data to a third country:

No data is transferred to a third country.

The existence of automated decision-making, including profiling, and, at least in these cases, meaningful information about the procedure used, the significance and the envisaged consequences of such processing for the data subject:

No automated individual decision-making or profiling is carried out.

YOUR RIGHTS CONCERNING DATA PROCESSING:

The GDPR contains in detail your data protection rights, your possibilities of seeking a legal remedy and the restrictions thereof (especially Articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79 and 82 of the GDPR). You can at any time request information about your personal data processed, 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 direct marketing (the sending of direct marketing messages), and you have the right to data portability. We summarize the most important provisions below. You may exercise rights and seek legal remedies by contacting any of the Company.

Right to information:

If the Company processes your personal data, it must provide you information – even without your special request thereof – concerning the main characteristics of the data processing including the purpose, legal basis and period of processing, the identity and contact details of the Company and its representative, the contact details of the data protection officer, the recipients of the personal data (in case of data transfer to third countries indicating also the adequate and appropriate guarantees), the legitimate interests of the Company and/or third parties in case of a data processing based on a legitimate interest, furthermore your data protection rights and your possibilities of seeking a legal remedy (including the right of lodging a complaint with the supervisory authority), the source of personal data – if you are not the source – as well as the categories of personal data, in the case you have not had yet all this information. In case of automated decision-making and profiling you must be informed by the Company in an understandable way about the logic involved, as well as the significance and the envisaged consequences of such processing for you. The Company provides the abovementioned information by making this privacy notice available to you.

Right of access:

You have the right to obtain from the Company confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and certain information related to the data processing such as the purpose of the data processing, the categories of the personal data processed, the recipients of the personal data, the (envisaged) period of data processing, the individual's data protection rights and possibilities of seeking a legal remedy (including the right of lodging a complaint with the supervisory authority), furthermore information on the source of the data where they are not collected from you.

Upon your request the Company shall provide a copy of your personal data undergoing processing. For any further copies requested by you, the Company may charge a reasonable fee based on administrative costs. Where you made the request by electronic means, and unless otherwise requested by you, the information shall be provided in a commonly used electronic form. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

The Company gives you information on the possibility, the procedure, the potential costs and other details of providing the copy after receiving your request.

In case of automated decision-making and profiling the individual has access to the following information: the logic involved, as well as the significance and the envisaged consequences of such processing for you.

Right to rectification:

You have the right to obtain from the Company 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 Company the erasure of personal data concerning you without undue delay and the Company has the obligation to erase personal data without undue delay where certain grounds or conditions are given. Among other grounds the Company is obliged to erase your personal data upon your request for example if the personal 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 Company is subject; or if the personal data have been collected in relation to the offer of information society services.

We inform you that the withdrawal of your consent does not affect the legality of the data processing carried out before the withdrawal, based on your consent.

Right to restriction of processing:

You have the right to obtain from the Company 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 Company 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 Company 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 Company override your legitimate grounds .

Where processing has been restricted according to 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 Company 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 Company in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Company 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.

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.

Right to data portability shall be without prejudice to the provisions governing the right to erasure; furthermore, it 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 Company, including profiling based on those provisions. The Company shall no longer process the personal data unless the Company 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.

The framework of exercising rights:

The Company shall provide information on action taken on a request based on your abovementioned rights without undue delay and in any event 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 Company shall inform you of any such extension within one month of receipt of the request, together with the reasons for the delay. Where you make the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by you.

If the Company does not take action on your request, the Company 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 data protection supervisory authority (in Slovak republic: The Office for Personal Data Protection of the Slovak Republic; in Slovak: "Úrad na ochranu osobných údajov Slovenskej republiky") and seeking a judicial remedy.

Contact details of The Office for Personal Data Protection of the Slovak Republic:

Address: Hraničná 12, 820 07 Bratislava 27

tel.: +421 /2/ 3231 3214

e-mail: statny.dozor@pdp.gov.sk

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

The information shall be provided by the Company in writing, or by other means, including, where appropriate, by electronic means. When requested by you, the information may be provided orally, provided that your identity is proven by other means.

Without prejudice to any other administrative or judicial remedy, you shall have the right to lodge a complaint with a supervisory authority, in particular 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 can read about how to contact supervisory authorities within the EU here: https://edpb.europa.eu/about-edpb/board/members_en. You shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning you. You shall further have the right to an effective judicial remedy where the competent supervisory authority does not handle your 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 shall 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 Company or its data controller or processor partner shall be brought before the courts of the Member State where the Company, the controller or the processor has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where you have your habitual residence.

In Slovak republic, the action falls within the jurisdiction of the General Courts of Slovak republic.

The court may order the data controller (Company) to provide the information, to rectify, block or erase the data in question, to annul the decision adopted by means of automated data-processing systems, to honor your objection. The court may order publication of its decision, indicating the identification of the data controller or any other data controllers and the committed infringement.

The data controller concerned shall be liable for any damage caused to you as a result of unlawful processing or by any breach of data security requirements. Where any data controller violates the rights of the data subject relating to personality as a result of unlawful processing or by any breach of data security requirements, the data subject shall be entitled to demand restitution from the data controller concerned. Data controller may be exempted from liability for damages or for payment of restitution if he proves that the damage was caused by or the violation of the rights of the data subject relating to personality is attributable to inevitable reasons beyond his control.

No compensation shall be paid and no restitution may be demanded where the damage was caused by or the violation of rights relating to personality is attributable to intentional or negligent conduct on the part of the data subject.