

**PRIVACY NOTICE**  
**concerning processing operations related to the Slovnaft Move programme**  
(hereafter referred to as “**Privacy Notice**”)

Description and the purpose of the processing	Legal basis of the processing	Scope of the processed data and their source	Period of data processing	Addressee of data transfer	Data processor and its activity
<p>Ensuring participation in the Slovnaft Move programme (hereafter referred to as “Slovnaft Move”), Slovnaft Move card production in digital form (hereafter referred to as “Slovnaft Move Card”), operation of the Slovnaft Move (including termination thereof), e.g. contacts with the customers.</p> <p>For example: in the course of the registration process, customers may receive emails on the status of their registration and membership, what is required to finish the registration, verification emails and reminders thereof, or information on the Slovnaft Move – e.g. how the various tiers work, how to collect points and redeem rewards, tier upgrade notifications, tier downgrade notifications, tier renewal notifications; similar processing is carried out in case of customer's</p>	<p>Article 6 (1) (b) of the GDPR<sup>1</sup> - processing is necessary for the performance of the terms and conditions of the Slovnaft Move General Terms and Conditions, available at the following link <a href="http://www.slovnaftmove.sk/s/gtc?language=en_US">www.slovnaftmove.sk/s/gtc?language=en_US</a> which the customer has accepted, or in order to take steps at the request of the customer prior to his/her registration in the Slovnaft Move. A description of the messages sent by SLOVNAFT, a.s. (hereafter referred to as “<b>Company</b>” or “<b>Data Controller</b>”) that are essential for the operation of the Slovnaft Move (so-called "System Messages") are set out in Section 6 of the Slovnaft Move General Terms and Conditions.</p>	<p><b>Minimum requirements for the registration:</b> name (first &amp; last name), e-mail address;).</p> <p><b>Optional data for the registration:</b> date of birth (easier identification in case of customer claims via the customer service line) and phone number (in that case, the customer can receive general information – via other short messaging apps (f. e. SMS or viber)).</p> <p><b>Slovnaft Move Card-related data following the registration:</b> information on the acceptance of the Slovnaft Move General Terms And Conditions, this Privacy Notice, and declaration that the customer who is a minor is above 18 years old and has</p>	<p>Company deletes all personal data and all information about the customer within 30 (thirty) days from the customer’s request or from the date defined by the Slovnaft Move General Terms and Conditions and/or the Privacy Notice.</p> <p>Company will keep the personal data for a 1-year period because claims against Company can be made (e.g. claimed damages, due to obtained but unused points), if</p> <p>(i) Company terminates the customer’s participation in the Slovnaft Move, or the Slovnaft Move itself (data retention begins</p>	<p>Company.</p> <p>Data recipient is also data processor (see the column <i>Data processor and its activity</i>).</p>	<p><b>SFDC Ireland Limited (Salesforce)</b>  3rd and 4th Floor, 1 Central Park Block G, Central Park, Leopardstown, 18 Dublin, Ireland;</p> <p>Tasks: definition and execution of process steps related to the registration in the Slovnaft Move, communication and case management for example solving customer’s inquiries, complaints, all information which is coming through the customer center pertaining to the Slovnaft Move.</p> <p><b>Social Annex, Inc. (Annex Cloud)</b></p>

<sup>1</sup> 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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<p>requests for new Slovnaft Move Card (e.g. in case of malfunction).</p> <p>Customers also receive personalised monthly information (including monthly reports) about tier status &amp; tier benefits, point balance, what is needed to get to another tier, and coupons. This personalised information concerns only practical information (e.g. registration, usage of the Slovnaft Move Card and similar actions) related to the usage of the Slovnaft Move Card (marketing information is covered under purposes listed below).</p> <p>In case of participation in the Referral Program (as defined in the Slovnaft Move General Terms and Conditions), the invited customer may receive a reminder if he/she entered the referral code during registration and he/she does not make a transaction for specific period of time (e.g. 1 week) but the reward for the referral is pending.</p>		<p>residency in European Union (EU), Slovnaft Move Card number, Slovnaft Move Card usage data (e.g. information on transactions), password in case of online application (only the hash version of the password is stored), date of registration, information on the privacy consents from the customer (e.g. for personalised marketing), customer status (e.g. active, inactive), other communications from the customer (e.g. complaints, inquires), coupons or campaigns assigned to the customer based on his/her tier in Slovnaft Move.</p> <p><b>Participation in the Referral Program:</b> the identity of the inviting customer, the identity of the invited customer, the referral code, the transaction made by the invited customer, the reward given to each customer.</p>	<p>on the termination date).</p> <p>(ii) Company deactivates the Slovnaft Move Account (1 year data retention begins after 30 days from the Deactivation).</p> <p><b>Tax obligations:</b> data retention period is 10 years from the last day of the calendar year in which the tax concerned should have been declared or reported or, in the absence of such declaration or report, the tax should have been paid.</p> <p><b>Accounting documents:</b> the data retention period is 10 years according to the relevant tax and accounting regulations. In practice this means when the data are included in documents which support the accountancy records</p>		<p>5301 Beethoven Street, Suite 230, Los Angeles, CA 90066 USA;</p> <p>Task: tier scheme management and storage of points and balances.</p> <p>The servers of Annex Cloud are in Frankfurt, Germany and back-up servers are in Ireland, which means there is no data transfer outside of EU region.</p> <p><b>Microsoft</b></p> <p>Task: storage of login details.</p> <p><b>Company's Service Station Operator(s) (hereafter referred to as "SeS"):</b> Partners operating the SeS on behalf of Company in Slovak republic. The information on relevant data processors shall be</p>

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		<p><b>Source of data:</b> provided by the customer / obtained through customers' usage of the Slovnaft Move Card.</p>	<p>e.g. for example the data appear in contract documents between Company and the counterparty (such as an order) or on an invoice.</p> <p>Other data storage periods may apply, as described at the relevant data processing purposes below.</p>		<p>shared with the customer on request.</p> <p>Tasks: Support customers in case of questions during the purchase on the seS with regard to the Slovnaft Move benefits.</p> <p><b>Diebold-Nixdorf Kft.</b> 2220 Vecsés, Lőrinci út 59, Hungary;</p> <p>Task: providing IT and server services closely related to the data processing.</p> <p><b>IBM Magyarországi Kft.</b> 1117 Budapest, Neumann János u 1. Hungary;</p> <p>Tasks: evaluation of data quality and characteristics.</p> <p>For example:</p> <ul style="list-style-type: none"> <li>• The (technological) characteristics of the stored data, i.e.</li> </ul>

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					<p>whether the text / number / date format is appropriate, how long each field is, is it possible to select from free text or predefined values (texts).</p> <ul style="list-style-type: none"> <li>• Verification of formal and logical compliance. For example, whether the e-mail address always contains an @, whether the mobile phone number is entered in international format.</li> <li>• Verification whether the individuals have completed the name or date of birth field (if it has been filled in), if is necessary.</li> </ul> <p>Based on the results, the Company either</p>

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					(i) corrects the data itself (pursuant to Article 16 of the GDPR), for example in the case of an obvious spelling error; or (ii) asks the individual to verify the data which appears to be inaccurate.
<p><b>Measuring and improving the performance and efficiency of product sales and marketing campaigns.</b></p> <p>Within this purpose, the Company analyzes sales and other aggregated data (SeS revenue, products sold, etc.) in order to be able to make business decisions based on data and the long term trends.</p>	<p>Article 6 (1) (f) of the GDPR (the processing is necessary for the legitimate interests of the Company.</p> <p>Legitimate interest is the measurement and improvement of the performance and efficiency of product sales and marketing campaigns.</p>	<p>Customer ID, profile data (if provided), date of birth (if provided), registration type, survey results, information on the privacy consents from the customer (e.g. for personalised marketing), customer status (e.g. active, inactive), coupons or campaigns assigned to the customer based on his/her tier, Sloznaft Move Card number and Sloznaft Move Card usage data (e.g. information on transactions.</p> <p><b>Source of data:</b> provided by the customer / obtained through customers' usage of the</p>	<p>The period of data processing is the period as long as the customer is a participant of the Sloznaft Move, until their account is inactivated.</p>	<p>Company.</p>	<p><b>Stratis Kft.</b> 1037 Budapest, Szépvölgyi út 139, Hungary; 06-1-454-1900 <a href="http://www.stratis.hu">www.stratis.hu</a></p> <p>Tasks: collection of transactional data related to the Sloznaft Move, loading these data into the data warehouse which enables analytics.</p> <p>For example:</p> <ul style="list-style-type: none"> <li>Monitoring the performance of the Sloznaft Move, e.g. number of registered Sloznaft Move customers, number of active</li> </ul>

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		Slovnaft Move Card.			<p>Slovnaft Move customers, average Slovnaft Move basket size, number of Slovnaft Move transactions, Slovnaft Move transaction penetration (Slovnaft Move customer vs. non-loyalty customer), average days spent in tiers, average point collection per customer.</p> <ul style="list-style-type: none"> <li>• Monitoring the registration trends, e.g. number of newly registered customers, number of general / marketing consents provided, number of mobile app registrations.</li> <li>• Monitoring the performance of general campaigns, e.g. number of emails sent, number of coupons issued,</li> </ul>

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					number of coupons redeemed.
<p>Sending general marketing messages (commercials), regular offers and surprises, promotional offers, coupons and sending reminders about Slovnaft Move level upgrades, level renewals and downgrades via email, SMS and through Slovnaft Move Application (if you download it).</p> <p>Sending requests for participation in challenges, market research, fill in questionnaires, satisfaction surveys (e.g. survey on benefits received in the Slovnaft Move, requesting feedback after purchase at SeS) via email, telephone enquiries in SMS and through Slovnaft Move Application (if you download it).</p> <p>Invitations to campaigns, games (competitions).</p> <p>Sending invitations via email, push notification, other short messaging apps (f.e. Viber and SMS) (in case customer gave mobile phone number and chose other short messaging apps, f.e. Viber or SMS as additional</p>	<p>Article 6 (1) (f) of the GDPR - the processing is necessary for the legitimate interests of the Company: to familiarise potential customers with the products and services of the Company, to promote the Company' activities and to understand the customers' opinions and expectations.</p> <p>The invitation and the reminders will raise the customers' awareness about the Referral Program and ask them to refer their contacts (invited customers).</p>	<p>Customer's name, email and phone number (if provided in the registration phase) and application username (email), content of promotional messages. If the customer provides his/her phone number, he/she can receive coupons and general marketing this way, e.g. via SMS or Viber.</p> <p>For market research or satisfaction surveys: Slovnaft Move Card usage data, data recorded or generated during market research.</p> <p>Data source: from the customer.</p>	<p>Until objection by the relevant individual (data subject), otherwise until the relevant individual (data subject) participates in the Slovnaft Move.</p> <p>The customer can object to the data processing (i.e. unsubscribe) in the following ways:</p> <ul style="list-style-type: none"> <li>• in the Slovnaft Move Application (effective immediately)</li> <li>• on the Slovnaft Move Website (effective immediately)</li> <li>• unsubscribe link in emails sent on these topics (effective immediately)</li> <li>• in a notification opened to the customer service</li> </ul>	<p>Company.</p>	<p><b>SFDC Ireland Limited (Salesforce)</b>  3rd and 4th Floor, 1 Central Park Block G, Central Park, Leopardstown, 18 Dublin, Ireland;</p> <p>Tasks: definition and execution of campaigns, for example sending out marketing messages.</p> <p><b>4Service Holdings GmbH</b>  Tegetthoffstraße 7, 1010 Vienna, Austria;</p> <p>Tasks: assisting in sending customer feedback e-mails and statistical analysis of the responses received.</p>

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<p>communication channel) to participate in the Referral Program. Customer may receive two sets of reminders to participate in the Referral Program – approximately two weeks after the initial invitation, then approximately 3 months after the initial invitation.</p>			<p>(effective after the case has been processed).</p>		
<p><b>Showing the nearby SeS and sending you location-specific offers via email, other short messaging apps (f.e. Viber, SMS) and through an Slovnaft Move Application (if you download it), based on your location.</b></p> <p>Without consent, we do not show you the nearby SeS and send you location-specific offers based on your location.</p>	<p>Article 6 (1) (a) of the GDPR (voluntary consent of the customer).</p> <p>Customers can enable location tracking / locations services and the location-based marketing via their phone. The modification of the location settings will not be done in the Slovnaft Move Application but in the phone settings. Customers should be aware that it might differ by platform and version.</p>	<p>The customer’s location, name, email and phone number and Slovnaft Move application username (email), Slovnaft Move Card number.</p> <p>Source of data: provided by the individual / location data obtained through the customers’ device.</p>	<p>Until the customer withdraws the consent, otherwise until the relevant customer participates in the Slovnaft Move.</p>	<p>Company.</p>	<p><b>SFDC Ireland Limited (Salesforce)</b>  3rd and 4th Floor, 1 Central Park Block G, Central Park, Leopardstown, 18 Dublin, Ireland;</p> <p>Tasks: definition and execution of campaigns for example sending out marketing messages.</p>
<p><b>Sending tailored, customized marketing messages (commercials), coupons, additional products, challenges, special promotions and personalized offers and information about offers/discounts and invitations to personalised, profiling-based</b></p>	<p>Article 6 (1) (a) of the GDPR (voluntary consent of the individual) – applicable to all cases of marketing save for direct email marketing described above.</p>	<p>The customer’s name, email and phone number and Slovnaft Move Application username (email), date of birth (if provided) and other optional registration data (f.e. gender, city, ZIP code), Slovnaft Move Card</p>	<p>Until the customer withdraws the consent, otherwise until the relevant customer participates in the Slovnaft Move.</p>	<p>Company.</p>	<p><b>SFDC Ireland Limited (Salesforce)</b>  3rd and 4th Floor, 1 Central Park Block G, Central Park, Leopardstown, 18 Dublin, Ireland;</p>



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<p>campaigns, games, according to your purchase habits (special types are Next Best Offers, offers specially for churning customers) via email, other short messaging apps (f.e. SMS, Viber) and through Slovnaft Move Application (if you download it) and/ or recommending the above messages, promotional offers, coupons on screen, upon purchase or at the SeS.</p> <p>Company sends certain marketing messages based on the profiling of the customers.</p> <p>Without consent, we do not send tailored, customised marketing messages (commercials), coupons, additional products, challenges, special promotions and personalized offers to the customers nor do we make customers' profiles without consent.</p>	<p>Profiling is also based on explicit consent of the customer (Article 22 (2) (c) of the GDPR).</p>	<p>number, Slovnaft Move Card usage data and any other registration data required for the purpose of sending personalized offers specified in the customer's profile, scope of interest concerning the services/products offered, answers provided to additional questions (e.g. data collected via surveys).</p> <p>Source of data: provided by the individual / data obtained through customers' profiling (profiles are made by Company).</p>	<p>The Customer can change her/his consent in the following ways:</p> <ul style="list-style-type: none"> <li>• in the Slovnaft Move Application (effective immediately)</li> <li>• on the Slovnaft Move Website (effective immediately)</li> <li>• unsubscribe link in emails sent on these topics (effective immediately)</li> <li>• in a notification opened to the customer service (effective after the case has been processed).</li> </ul>		<p>Tasks: definition and execution of campaigns for example carrying out segmentation, sending out marketing messages.</p> <p><b>Hifylabs Zrt.</b> 1114 Budapest, Bartók Béla út 15/B, Hungary;</p> <p>Tasks: Create and maintain the automated processes used for creation of personalized offers, participation in the creation of machine learning processes and evaluation reports.</p> <p><b>Abylon Consulting Kft.</b> Hungary, 8000 Székesfehérvár, Mátra u. 11, Hungary Tasks: Operation of development environment for data needed for personalized offers.</p> <p><b>4Service Holdings GmbH</b></p>

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					Tegetthoffstraße 7, 1010 Vienna, Austria;  Tasks: assisting in sending customer feedback e-mails and statistical analysis of the responses received.
<p><b>Digital marketing activities (campaigns, contests, promotion) related to the Slovnaft Move</b></p> <p>For example: using Facebook Custom Audience to identify “advertising audiences”, using Facebook Custom Audience to identify “lookalike advertising audiences”, using Google Customer Match to identify “advertising audiences”, creating a “similar audience” using Google Similar Audience (“GSA”).</p> <p>In the case of this processing of customer personal data, the provisions of the separate privacy notice apply: <a href="https://slovnaft.sk/en/about-us/privacy-policy-documents/">https://slovnaft.sk/en/about-us/privacy-policy-documents/</a>.</p>	<p>The provisions of the separate privacy notice are applied.</p>			<p>Company.</p>	<p><b>Mindshare Slovakia s.r.o.</b>            Karadžičova 8, 821 08 Bratislava, Slovak republic;</p> <p>Tasks: provides comprehensive support to the Company in digital marketing activities related to the Slovnaft Move.</p> <p><b>oh my DOT Bratislava s. r. o.</b>            Vajnorská 100/B, 831 04 Bratislava, Slovak republic;</p> <p>Tasks: provides comprehensive support to the Company in digital</p>

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					<p>marketing activities related to the Slovnaft Move.  <b>Elite / Monday Lovers, s.r.o.</b>  Obchodná 58,  811 06 Bratislava - mestská časť Staré Mesto, Slovak republic;</p> <p>Tasks: provides comprehensive support to the Company in digital marketing activities related to the Slovnaft Move.</p>
<p><b>Prevention, detection and investigation of fraud and abuse concerning the Slovnaft Move.</b></p> <p>For example, the Company will keep the personal data of the customer if the customer's participation in the Slovnaft Move was terminated with immediate effect earlier due to a breach of contract, abuse or other unlawful conduct.</p> <p>Company is analyzing reports in order to discover potential fraud activities (e.g. based on number of</p>	<p>Article 6 (1) (f) of the GDPR - the 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.</p> <p>Legitimate interest balancing test has been conducted.</p>	<p>Name, Slovnaft Move Card number, 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 product(s), purchase place and time etc.) to detect and investigate potential misuse of the Slovnaft</p>	<p><b>1.</b> If the customer's participation in the Slovnaft Move was terminated with immediate effect earlier due to a breach of contract, abuse or other unlawful conduct, the Company will store the relevant customer's data for 1 year, in order to prevent any new registration from the customer.</p>	<p>Company.</p>	<p><b>Stratis Kft.</b>  1037 Budapest, Szépvölgyi út 139, Hungary;  <a href="http://www.stratis.hu">www.stratis.hu</a></p> <p>Tasks: providing IT services closely related to the data processing (analytics and reporting)</p>

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<p>transactions per day, number of SeS within one day for one customer). The result of these reports can be a basis of further investigation.</p> <p><b>For the prevention and investigation of fraudulent acts and abuse</b>, the Company Code of Ethics also apply which is available at:  <a href="https://slovnaft.sk/en/about-us/ethics/">https://slovnaft.sk/en/about-us/ethics/</a></p>		<p>Move Card, until it is necessary for the investigation.</p> <p>Data source: from the data subject or from any report on the data subject or the related procedure.</p>	<p><b>2.</b> If there is an Ethics procedure but the investigation finds that the report is not substantiated or action is not required, the data related to the report must be deleted in 60 days from the investigation's completion.</p> <p><b>3.</b> If an action is required, including legal or disciplinary action against a reporting person, the Company will process the data related to the investigation until the final and binding closure of the proceedings.</p>		
<p><b>Managing customer complaints</b>, among others, concerning the Slovnaft Move (we provide separate information on <a href="https://slovnaft.sk/en/about-us/privacy-policy-documents/">https://slovnaft.sk/en/about-us/privacy-policy-documents/</a> ).</p>	<p>The provisions of the separate privacy notice are applied.</p>			<p>Company.</p>	

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<p><b>Exercise of legal claims by the Company concerning the Slovnaft Move.</b></p> <p>This includes e.g. defence in legal disputes and procedures of authority initiated by the customers in connection with the Slovnaft Move or under Article 17 (3) e) of the GDPR.</p> <p>Source of data: as specified in the relevant point.</p>	<p>Article 6 (1) (f) of the GDPR - the processing is necessary for the legitimate interests of the Company: exercising legal claims and successful defence in a potential legal or official proceeding (e.g. court proceeding initiated by a customer, administrative or out-of-court procedure etc.).</p> <p>Legitimate interest balancing test has been conducted.</p>	<p>Name, email, phone number (only if the dispute is related to the lawfulness of its processing), date of birth, Slovnaft Move Card number and Slovnaft Move Card usage data if needed to exercise rights or settle legal disputes in the Slovnaft Move.</p>	<p>The general period of data processing is defined in case of each data processing operation.</p> <p>If the data are needed to exercise legal claims or for defence against any civil law claims, the period of data processing is the time necessary to conduct the proceeding(s) and until the definitive conclusion of such proceedings or achievement of the legitimate interest by other means (e.g. conclusion of an out-of-court settlement).</p>	<p>Company.</p>	

**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.slovnaftmove.sk](http://www.slovnaftmove.sk)  
[info@slovnaft.sk](mailto: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 lawyers for this purpose. Such lawyers 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.

**Contact person(s) of the Company**

Slovnaft Move SLOVNAFT, a.s.  
Vlčie hrdlo 1, 824 12 Bratislava  
Slovak republic  
0850 111 811  
[move@slovnaft.sk](mailto:move@slovnaft.sk)

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

Company Data Protection Officer: [zodpovednaosobagdpr@slovnaft.sk](mailto: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:

- Company – relevant staff of the Company
- If Company initiates an ethics investigation, members of the Ethics Council will have access to the information required for the investigation
- If it is necessary to process legal claims, employees of the Company will have access to the data required for the processing of legal claims
- If Company initiates other procedures to prevent, detect and investigate fraud and abuse, relevant employees of the Company will have access to the data required for the investigation.

### Name, registered seat, telephone number, website and email address of data processors and other data controller recipients

Data controllers:

When downloading the Sloznaft Move Application Apple Inc. (App Store) and Google Inc. (Google Play) are individual data controllers.

When registering with Facebook or Google account, Facebook and Google Inc. are individual data controllers. Company will have access only the username (email address) of the customer used for the login (stored) by the relevant service provider.

Data processors:

#### **SFDC Ireland Limited (Salesforce)**

3rd and 4th Floor, 1 Central Park Block G, Central Park, Leopardstown, 18 Dublin, Ireland

#### **Social Annex, Inc. (Annex Cloud)**

5301 Beethoven Street, Suite 230, Los Angeles, CA 90066, USA

The servers of Annex Cloud are in Frankfurt, Germany and back-up servers are in Ireland, which means there is no data transfer outside of EU region.

#### **Diebold-Nixdorf Kft**

2220 Vecsés, Lőrinci út 59., Hungary

#### **IBM Magyarország Kft.**

1117 Budapest, Neumann János u 1., Hungary

contact: <https://www.ibm.com/contact/hu/hu/>

#### **Stratis Kft.**

1037 Budapest, Szépvölgyi út 139., Hungary;

e-mail: [info@stratis.hu](mailto:info@stratis.hu); web: [www.stratis.hu](http://www.stratis.hu)

**Hiflylabs Zrt.**

1114 Budapest, Bartók Béla út 15/B, Hungary

**Abylon Consulting Kft.**

8000 Székesfehérvár, Mátra u. 11, Hungary

**4Service Holdings GmbH**

Tegetthoffstraße 7, 1010, Vienna, Austria

**Mindshare Slovakia s.r.o.**

Karadžičova 8, 821 08 Bratislava, Slovak republic

**oh my DOT Bratislava s. r. o.**

Vajnorská 100/B, 831 04 Bratislava, Slovak republic

**Elite / Monday Lovers, s.r.o.**

Obchodná 58, 811 06 Bratislava - mestská časť Staré Mesto, Slovak republic

When Company engages service providers which act as data processors, they ensure that adequate data processing agreements in accordance with Art 28 GDPR are in place. These agreements aim to ensure, inter alia, that processing of personal data is conducted by data processor on the behalf of Company and only on the basis of instructions provided by Company.

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

In the framework of your participation in the Slovnaft Move 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 in the framework of participation in the Slovnaft Move.



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

We will not make any decision based on automated data processing concerning you (Article 22(1) GDPR). However, we will create a profile on you, based on your consent. The field of interest (profile) of you, as the potential addressee of the tailored, customised marketing messages will be based on the following main aspects: your Slovnaft Move Card usage data (purchase history: the services or the products previously used or purchased by you from the Company – e.g. type of product and service, frequency and value of purchase) and your age and gender. For example: we assess what kind of soft drinks ladies between 35-40 years of age buy when refuelling their cars, and next time we offer a similar soft drink to the given lady between 35-40 years of age who participates in the Slovnaft Move.

Another example: in order to evaluate the efficiency of the marketing messages, we make a record as to which marketing messages you have received, and what products and services you have purchased, and when and how frequently you have done so and how much you paid for them. Location of purchase and / or location of customer is another criteria for segmentation. Based on these factors, we determine the kinds of future customised messages, which may be sent to you. We determine for instance – on the basis of buying habits – at what times or with what frequency it may be worth sending to you customised marketing messages or the kind of products and services that may be worth offering to you. A tailored offer is for example that we may send a coupon to you on your birthday related to your favourite kind of coffee. We identify your favourite type of coffee in reliance on previous purchases. If we see that you buy a bakery product with the coffee, we may offer such product as well in the marketing message sent.

**Data security measures:**

The Company stores your personal data in a protected electronic data repository in order to ensure the secrecy, integrity and availability of your personal data in accordance with the IT security norms and standards. Within the framework of risk-proportionate protection and measuring the classification of personal and business data, the Company ensures the protection of data on a network, an infrastructural and an application level (with firewalls, antivirus programs, encryption mechanisms for storage and communication, content filtering and other technical and process solutions). The personal data breaches are constantly monitored and managed. In case of encryption, the encrypted data flow is not retrievable without the knowledge of the decryption code due to the asymmetric coding, in addition with content filtering and other technical and process solutions). The data security incidents are constantly monitored.

Data Security measures:

<b>Information Security Management System</b>	To ensure the confidentiality, integrity and availability of organizational information by implementing policies, processes, process descriptions, organizational structures, software and hardware functions.
<b>Physical access</b>	To ensure physical asset protection containing MOL Group information.
<b>Logical access</b>	To ensure that only approved and authorized users have access to data used by MOL Group Companies.
<b>Data access</b>	To ensure that only authorized users of the systems have access to MOL Group Company data.

<b>Data transfer/ storage/ erasure</b>	To ensure that MOL Group Company's corporate information is not transmitted, read, modified or erased by an unauthorized person while it is being transferred or stored. In addition, MOL Group company data must be deleted promptly when the purpose of processing ceases.
<b>Confidentiality and integrity</b>	To ensure that MOL Group's corporate data is kept confidential and up-to-date, also preserves integrity.
<b>Availability</b>	To ensure that MOL Group Company data is protected against accidental destruction or loss and, in the event of such an event, access to, and recovery of, relevant MOL Group Company Data is on time.
<b>Separation of data</b>	To ensure that MOL Group Company data is handled separately from other client data.
<b>Incident management</b>	In the event of any breach of the MOL Group Corporate Information, the effect of the breach will be minimized and the owners of the MOL Group Company Information will be notified immediately.
<b>Audit</b>	To ensure that the processor periodically tests, examines and evaluates the effectiveness of the technical and organizational measures outlined above.

#### **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.

If the data processing is based on your consent the consequence of the withdrawal of the consent: we do not send or offer tailored, personalised marketing (advertising) messages, promotional offers, coupons.

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](mailto: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](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.