

Privacy Notice

CORPORATE COMMUNICATION

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”), besides the production, warehousing, distribution and wholesale of oil products, the Company owns the largest retail network in the Slovak Republic which focuses on the sale of motor fuels and lubricants and provision of a wide range of customer services. The promotion and advertisements of the Company as such, its position and roles in the Slovak Republic, European Union, petrochemical industry and global market, its activities and products, as well as employees and their results and success-stories are integral and inevitable for implementation of the Company’s business objectives. The aim of this activities is also to increase interest in employment at the Company building a corporate culture, ensuring internal and external communication, organizing various events, activities and with this related take and publication of photographs and audio-visual records (purpose of processing). The activities mentioned above may involve processing of personal data by the Company as the Controller.

PERSONAL DATA WE PROCESS ABOUT YOU

Common personal data, such as name, surname, title, address of the place of residence, function/work position, telephone number, likeness (in the form of an image (photograph) or audio-visual record), professional CV, or any other data needed to achieve the purpose of processing.

LEGAL BASIS OF THE PERSONAL DATA PROCESSING

As part of Corporate Communication, your personal data are processed for the purpose above based on statutory conditions set out in the Regulation,¹ namely in Article 6(1), letters:

- a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b) 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 (contractual and pre-contractual relationship, e.g. various donations contracts, contract on commercial cooperation, etc.); if personal data are not provided, the Company cannot enter into contractual relationship with you;
- f) processing is inevitable for the purposes of legitimate interests pursued by the Controller (promotion of the Company, building of the good name (reputation) and corporate culture of the Company, documentation of the Company's historical activity, ensuring internal communication, information by mass media in relation to Section 78 (2) of the Act on Personal Data Protection² (intranet, internal and external periodicals); respectively Section

¹Regulation (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.

78 (1) of the Act on Personal Data Protection (processing of personal data is necessary for the academic, artistic or literary purpose).

PERIOD FOR PERSONAL DATA STORAGE

If the processing of personal data is based on consent, we will process your personal data for a period specified in that consent (usually for 2 or 5 years from the granting of consent), respectively pending withdrawal of consent.

In case when the processing of personal data is based on a contractual relationship, your personal data are processed for the duration of the contractual relationship and thereafter are stored for archiving purposes for 10 years as from the expiry of the contract. The retention period commences on the first day of the year following the year of contract termination.

According to Registry Order and Registry Plan of the Company, selected photographs, video recordings, internal and external periodicals form part of documents which are stored as records of the permanent documentation value.

After expiry of such periods, personal data shall be destroyed (deleted), unless there are other legal grounds for their processing (exercising legal claims, for purposes of litigation, etc.).

We inform you that the Company as the Controller cannot ensure disposal of photographs or any other personal data published in distributed electronic or paper form of 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 regulations³.

Your personal data may be further provided to recipients, such as the processors, provided they have been entrusted with processing of personal data on behalf of the Controller, other entitled subjects in terms of applicable legal regulations. Information on current processors are available at the Company's website www.slovnaft.sk, About us, link to the Privacy Policy Documents.

Your personal data shall be stored safely, in accordance with the security policy of the Controller and the processor and only for the period necessary to meet the purpose of processing. Your personal data shall be only accessible to persons entrusted by the Controller

³ 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 the instructions of 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 the 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.

In compliance with the Regulation and the Act on Personal Data Protection, the Company as the Controller processes your personal data within the scope and under the conditions defined in special regulations.

Your personal data are not subject to automated decision-taking including profiling. We do not transfer your personal data 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
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

Regulation respectively Act on Personal Data Protection contains in detail your data protection rights, 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 at any time 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 to the sending of direct marketing messages, and you have the right to data portability. We summarize the most important provisions below.

Right to information

If the data Controller processes your personal data, it must provide you with the information concerning the data concerning you – even without your special request thereof – including the main characteristics of the data processing such as the purpose, legal basis for the

processing and the time period for which the personal data will be stored, the identity and the contact details of the Controller and its representative (where applicable), 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 data Controller and/or third parties in case of 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). In case of automated decision-making or profiling, the data subject must be informed about the logic involved as well as the significance and the 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 of 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, 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 concerned, the recipients of the personal data, the envisaged period for which the personal data will be stored, the data subject'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 the personal data are not collected from the data subject. Upon your request, the Controller shall provide a copy of your personal data undergoing processing. For any further copies requested by you, the Controller may charge a reasonable fee based on administrative costs. The right to obtain a copy shall not adversely affect the rights and freedoms of others. The Controller 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.

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 given. Among other grounds the data

Controller 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 Controller is subject; or if the personal data have been collected in relation to the offer of information society services.

The Controller shall not be able in some cases to satisfy your request; for example that processing is necessary for exercising the right of freedom of expression and information; for compliance with a legal obligation which requires processing by Union or Member State law to which the Controller is subject 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 shall 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.

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.

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.

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.

Right to withdraw consent at any time

Where processing is based on your consent, you have right to withdrawal consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before 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 E-mail of the Data Protection Officer 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 which is the Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27, telephone No.: +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 against a Controller shall 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 a 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).

In case of any questions concerning the processing of your personal data, you may contact us via our Data Protection Officer.

All changes in the conditions of processing and protection of personal data are published at our website www.slovnaft.sk in the form of an update of this Privacy notice. This way, we will ensure that you always have current information about the terms and conditions under which your personal data are processed.