

PRIVACY NOTICE

COTAS

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”) is a refinery and petrochemical company. Among other things, the Company ensures distribution of oil products, hydrocarbon-based fuels, through a retail network in the Slovak Republic to state and private entities and wide public so that such state and private entities may meet their obligations and the quality of life of wide public is ensured. Fuels are delivered to points of sale using transportation tanks which are filled at hydrocarbon fuel loading rack at the Company's terminals in Bratislava, Kľačany and Kapušany.

The Ministry of Economy of the Slovak Republic (hereinafter only referred to as “ME SR”), in accordance with Section 6 (l) of Act No. 575/2001 Coll. on the Organization of the Activity of the Government and on the Organization of the Central State Administration as amended, in compliance with Section 9 (1) (b) of Act No. 179/2011 Coll. on Economic Mobilization and on amendment and supplementation of Act No. 387/2002 Coll. on Governing the Country in Crisis Situations Except for War Time and State of War as amended, and pursuant to Act No. 71/1967 Coll. on Administrative Proceedings as amended, has decided to amend the scope of measures of economic mobilization for SLOVNAFT, a.s., which was pursuant to Section 4 (1) (d) and Section 9 (1) (b) of Act No. 414/2002 Coll. (current Act No. 179/2011 Coll.) and based on the Decision of the ME SR No. 5/2003/KM determined as an subject of economic mobilization and which had the scope of execution of economic mobilization activities modified by means of Decision of the ME SR No. 345/2006-1040-13, No. 383/2010-2000-MH and No. 17453/2016-200-15806. With effect from the time when this Decision becomes valid, the Company is obliged to continuously take measures at the following objects:

- SLOVNAFT, a.s. Kľačany Terminal,
- SLOVNAFT, a.s. Stožok Terminal,
- SLOVNAFT, a.s. Kapušany Terminal,
- SLOVNAFT, a.s. Vlčie hrdlo, Bratislava Refinery

such measures of economic mobilization at time of safety include:

- **protection of objects of special importance and other important objects** pursuant to Section 5 (y) of Act No. 179/2011 Coll., using technical means of basic and extended parts of object protection, in order to fulfil the following requirements with relation to objects of special importance of protection using the integrated security system:
 - prevent unauthorized entrance into the object and avoid performance of activities in the object by unauthorized individuals or groups,
 - reduce or avoid security risk (e.g. risk of a terrorist attack, sabotage, theft, etc.),
 - ensure functioning of technology and the possibility to use stored supplies,
 - ensure security of operations and consequently also safety of movement of persons or Armed Forces of the Slovak Republic near the object,
 - ensure connection to distant surveillance centre for the purposes of distant monitoring of integrity of objects of special importance and the conditions of technical means of protection of objects of special importance.
- **protection of vital sources** pursuant to Section 5 (i) of Act No. 179/20011 Coll. as part of this measure, SLOVNAFT, a.s. as the subject of economic mobilization, shall ensure

preparation for protection of vital sources, which, when disrupted or made non-functional due to a risk factor, may pose a threat to economic and organizational activities in the state.

Risk factors include for example

- potential unauthorized entry of persons to a vital source in order to eliminate commercial interests of the subject of economic mobilization - SLOVNAFT, a.s.,
- potential threat to a vital source due to breakdown of foreign sources,
- potential terrorist attack on a vital source, etc.

Vital sources of SLOVNAFT, a.s. means objects of special importance or other important objects.

Protection of objects of special importance, protection of vital sources from undesirable risks and factors which may influence economic and organizational activities in the state is an important public interest that must be ensured by the subject of economic mobilization round-the-clock also when the conditions of the state are safe.

RULES ON PERSONAL DATA PROTECTION

Your personal data are only processed in compliance with statutory requirements stipulated in the Regulation¹ or Act on Personal Data Protection².

As the controller, the Company is legally obliged to disclose your personal data in the course of inspection, supervisory activity or upon request by authorized governmental bodies or institutions, if so prescribed by special regulations³.

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 for the fulfilment of the purpose of processing. Your personal data shall be only accessible to persons entrusted by the controller with personal data processing who process such data upon instructions issued by the controller and in compliance with the controller's security policy.

Your personal data are backed up in compliance with the controller's retention rules. Your data shall be fully deleted from backup storages as soon as possible in compliance with the rules for backups. Personal data stored at backup storage sites serve only for prevention of security incidents, in particular impaired availability of data due to a security incident. The Company is obliged to ensure data backup in compliance with security requirements defined in the Regulation and the 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.

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

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

³ For example Act no. 171/1993 Coll. regarding Police Force as amended; Act no. 18/2018 Coll. on Personal Data Protection and on amendment and supplementation of certain acts.

Complying 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 by special regulations. The purpose of personal data processing is to ensure automated checks, release and record-keeping with relation to drivers and vehicles upon entry to specially protected premises of the fuel loading rack at the subject of economic mobilization, namely in objects of special importance in order to take measures to ensure protection of:

- objects of special importance and other important objects to ensure:
 - functioning of technology and the possibility to use stored supplies,
 - security of operations and consequently also safety movement of persons or Armed Forces of the Slovak Republic near the object of operation,
- vital sources which, when disrupted or made non-functional due to a risk factor, may pose a threat to economic and organizational activities in the state.

Based on data imported during the entry procedure, the management system COTAS holds a record on the driver and the identification card assigned to the driver. The identification card contains two data: card identifier (number under which the card is recorded in the management system) and fingerprint identifier TAG-ID (unique number generated from the fingerprint). The driver is the holder of the card and the Company is the owner of the card. During identification, the system reads the fingerprint, generates a TAG-ID and compares it with the TAG-ID on the card. If the data match and the system does not detect any discrepancies in terms of validity of required certifications of the driver and the vehicle, the system allows entry of the vehicle to the technical premises of the terminal. Moreover, the management system COTAS records each entry and provides recorded data for further processing by the controller.

COTAS is implemented as a corporate system and the entry procedure (with each driver) is only carried out at the first object of the corporation at which the driver arrives. Your data (drivers' data) are kept in a local COTAS database. The server is located directly at the transportation tank fillers and the database is replicated in the central database "Central Cotas" stored in the server room in DATA PLEX at Dataplex, 13 Asztalos Sándor street, 1087 Budapest, Hungary. It is not possible to monitor data from SLOVNAFT, a.s. from local COTAS servers in Hungary. Data from SLOVNAFT a.s. may be only monitored in the "Central Cotas" database (for internal administrative purposes within MOL Group). Communication of all parts of the corporation takes place exclusively using the secure VPN connection while observing all security measures. Access to both local and central DB is only allowed to authorized persons.

The Company processes your personal data for the purpose above on the legal basis defined in Art. 6(1) (e) and Art. 9 (2) (g) of the Regulation when processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

If personal data are not provided, the Company shall deny you entry to restricted areas due to fulfilment of substantial public interest.

We shall keep your personal data for the term of your entry to specially protected areas of the fuel loading rack, as well as for the period during which we are obliged to maintain documents associated with the entry permit to such premises pursuant to applicable legal regulations in terms of Act No. 395/2002 Coll. on Archives and Registries and on amendment of certain acts as amended and personal data are part of a registry record. In accordance with terms of Records Retention Rules and the Registry Plan, we maintain the documents associated with the entry permit for 1 year after the expiry of validity of the entry permit. The retention period commences on the first day of the year following the year in which the right to enter restricted premises expired. After the expiry of such periods, personal data shall be destroyed (deleted), unless there are other legal grounds for their processing.

Your personal data are not processed by means of processors, they are not subject to automated decision-making including profiling and we do not disclose your personal data or transfer them to third countries.

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

Right of access

You have the right to obtain copies 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 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. 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.