

# PRIVACY NOTICE

## ENERGY

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”) ensures supplies and distribution of various types of energy and associated services, such as supplies and distribution of electricity, including associated services, supplies of potable water through public water main, removal and cleaning of waste water through public sewage system, and heat supplies. In the course of delivery and distribution of energy and provision of associated services, the Company as the controller processes personal data of data subjects.

### RULES ON PERSONAL DATA PROTECTION

Your personal data are only processed in compliance with statutory requirements stipulated in the Regulation<sup>1</sup> or Act on Personal Data Protection.<sup>2</sup>

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 processes personal data of a data subject - a natural person who is a customer, applicant for connection to local distribution network, public water main, public sewage system, a user of the distribution network, as well as his/her authorized/entrusted representative, an owner of properties if different from the customer/applicant, contact persons of the customer/applicant and other persons indicated on associated documents, within the scope determined in the relevant application, contract for energy supplies, power of attorney/authorization, as well as within the scope indicated on other documents associated with connection, access and conclusion and performance of relevant contracts.

The Company processes the above defined personal data to ensure clear identification of the customer, applicant, or his/her authorized/entrusted representative with relation to conclusion and performance of the contract, amendment or termination of the contract, administration and invoicing of the price for energy supplies or other prices and fees resulting from the contractual relation, keeping records of the customer's/applicant's debts resulting from the contract, proper settlement of all claims and liabilities resulting from the contract, handling claims and complaints, performing obligations resulting from relevant legal regulations, collaboration and provision of assistance to public authorities and other persons in terms of relevant legal regulations and fulfilling the basic precondition requiring that the contract is addressable, comprehensible and definite.

Processing of above mentioned personal data is necessary for connection of the applicant to the network, conclusion and performance of a contract to which the customer/applicant is a party (Article 6(1) b) of the Regulation), as well as for fulfilment of legal obligation of the Company with relation to data necessary for keeping records on household customers purchasing electricity and vulnerable household customers purchasing electricity (Article 6(1) c) of the Regulation, following the Energy Act<sup>3</sup>). In case of failure to provide personal data, the

---

<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).

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

Company shall not connect the applicant to the network or conclude a contract with the applicant/customer and supply individual types of energy and ensure associated services.

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 regulations.<sup>4</sup>

Your personal data may be also provided to recipients like courts, law enforcement authorities, bailiffs, attorneys, administrative bodies, Regulatory Office for Network Industries, Slovak Innovation and Energy Agency (electricity), operators of distribution networks (electricity), banks, operators of postal services, processors if entrusted with processing of personal data on behalf of the controller (information on current processors are available at the Company's website [www.slovnaft.sk](http://www.slovnaft.sk), link to the section on Privacy Policy depending on the purpose of personal data processing), MOL Nyrt., with registered office at Október huszonharmadika ul. 18., Budapest, Hungary (for internal administrative purposes within the MOL group), or other authorized entities in terms of relevant legal regulations.

Your personal data shall be stored in a secure manner, in compliance with the controller's and processor's security policy and only for the period necessary to fulfil the purpose of processing. Your personal data shall be only accessible to persons entrusted by the controller with personal data processing who process such data upon instructions issued by the controller and in compliance with the controller's security policy.

Your personal data are backed up in compliance with the controller's retention rules. Your personal data shall be fully deleted from backup storage sites as soon as possible in terms of 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.

The Company shall process your personal data during the period of validity of the contractual relationship (relevant contract) and for archiving purposes for 10 years from termination of the contract; in case of accounting records/invoices for 10 years following the year to which they relate, except for claims and complaints which are kept by the Company for 5 years from settlement of the claim or complaint. The retention period commences on the first day of the year following the year of contract termination or settlement of the claim/complaint. 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, administrative proceedings, etc.).

---

<sup>3</sup> Act No. 251/2012 Coll. on Energy and on amendment and supplementation of certain acts as amended.

<sup>4</sup> For example Act No. 171/1993 Coll. regarding Police Force as amended; Act No. 18/2018 Coll. on personal data processing and on amendment and supplementation of certain acts.

Your personal data are not subject to automated decision-making, including profiling. We do not disclose your personal data and do not transfer them to third countries or international organizations.

## **DATA PROTECTION OFFICER**

Safe processing of personal data and compliance of processing with the Regulation and the Act on Personal Data Protection are supervised by the Data Protection Officer whom you can contact in order to exercise your rights.

Contact details of the Data Protection Officer  
E-mail: [zodpovednaosobagdpr@slovnaft.sk](mailto: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 is 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](mailto: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.