

PRIVACY NOTICE FOR ENTRY

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. The Company has established and operates entry inspection systems which ensure definite registration of authorized entries to the object and performance of works in the object, including the legally prescribed records regarding security literacy, identification and verification as the only authentication method ensuring non-interchangeability of an individual entering to the object of special importance of the subject of economic mobilization and the object with increased risk for the life and health due to the impacts of petrochemical production. Their purpose is to reduce or completely eliminate the risk resulting from potential unauthorized intrusion into the object and prevent activities by unauthorized individuals or groups in the Company's object which might have detrimental effect on the economic and organizational activities of the state at safe times.

The implementation of identification with conditional pass consisting of attachment of an identification card with subsequent confirmation with a fingerprint (verification) is a measure which significantly minimizes security risks that might occur if unauthorized individuals and groups were allowed to entrance in the object in cases when common identification documents issued for entry to the object (identification cards) can be changed. This measure significantly reduces the risk of serious industrial accidents or terrorist attacks (due to non-professional or deliberate actions by unauthorized persons) resulting in severe fatalities and injuries to large number of persons, large damage to property, impaired functionality of production technology and impaired possibility to use stored supplies and protect vital sources, the impairment or non-functionality of which due to the risk factor would pose a threat to economic and organizational activities in the state.

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 secure.

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. 17453/2016-2000-15806. With effect from the time when this Decision becomes valid, the Company is obliged to 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 to the object and prevent 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.

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 Protection.²

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.³

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.

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 other acts.

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.

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.

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 for ENTRY is to ensure entry and inspection systems at SLOVNAFT, a.s..

a) automated record-keeping, identification and verification of each person

- who requested for entry to the object of the Company and who is in terms of statutory requirements obliged to attend a mandatory initial tutorial, professional training at the workplace (hereinafter only referred to as “the Training”) on fire prevention, health and safety at work, prevention of serious industrial accidents and first aid; at the same time an individual identification of participation, attendance at the Training or proving their existence, including the validity of a driving licence and ADR and their follow-up in case of certain persons,
- when issuing permission for work, provable familiarization with the content of permission for work in the environment with a risk of exposure to chemical factors, carcinogenic and mutagenic factors and in explosive environment, keeping records regarding the exposure to harmful environment and inspection,
- and control the entry of an authorized person in the object of special importance, economic mobilization into areas with increased risk of fire, explosion, poisoning or other undesirable effects on a human body, as well as prohibiting access to persons who would misuse common means used for record-keeping and access control (e.g. identification cards),
- to ensure minimization of an objectively existing large risk (embodied in the nature of the petrochemical operation) to health, life and risk of damage to property due to actions by individuals and groups without sufficient authentication method ensuring definiteness and non-interchangeability of the person entering defined premises and performing specific activities who has not attended a legally prescribed security training and did not obtain security literacy necessary for entry to and actions at exposed premises of a petrochemical production company.

b) identification and verification as an authentication method to determine non-interchangeability of an individual when determining exact number of persons and their allocation to objects at the site of the Company at Vlčie hrdlo 1, Bratislava or individual Terminals in case of extraordinary events connected with operational activities in a petrochemical company or an external impact (e.g. industrial accident, gas discharge, fire), for the needs of rescue and security units during search and rescue efforts,

c) prevention of unauthorized entrance to the object and prevention of performance of activities in the object by unauthorized individuals or groups,

to reduce or prevent the safety risk, protection of production technology functionality and the possibility to use stored supplies and protection of vital sources, the impairment or non-functionality of which due to a risk factor might pose a threat to economic and organizational activities of the state (terrorist attack, deliberate accident, damage to technology, impairment or theft of supplies, non-professional or forbidden activity or manipulation, etc.).

The Company processes your personal data for the purpose above on the legal basis defined in Article 6 (1) (e) and Article 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.

The company also processes your personal data in order to protect the property, health, safety of persons and the company's financial interests.

It is in the Company's legitimate interest (Article 6 (1) (f) of the Regulation) to ensure the protection of the Company's property, assets and financial interests, as well as the safety and health of persons moving on the Company's premises, including the possible impacts of petrochemical production.

We shall keep your personal data for the term of your entry to protected areas, 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. In accordance with terms of Records Retention Rules and the Registry Plan, we maintain the documents associated with the entry permit for 2 years after the expiry 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.

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

The Company declares that it has duly concluded contract with the processor who ensures appropriate level of personal data protection in compliance with applicable legal regulations pertaining to personal data protection.

The Processor: EFG Slovakia, s.r.o., Račianska 66, 831 02 Bratislava, Identification No.: 36 224 464 entrusted with processing of personal data necessary for record-keeping and control of entry into the object of SLOVNAFT, a.s., Vlčie hrdlo 1, Bratislava and into objects of the Company's Terminals mentioned above.

Your personal data 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 processing 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.