

# PRIVACY NOTICE

## LIST OF SHAREHOLDERS

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”) maintains a list of shareholders in order to ensure shareholders’ rights pursuant to Act No. 513/1991 Coll., the Commercial Code as amended, following Act No. 566/2001 Coll. on Securities and Investment Services and on amendment and supplementation of certain acts (Act on Securities) as amended.

In connection with the above, the Company as the controller processes personal data of data subjects: shareholders, statutory representatives of shareholders, persons empowered by the shareholder to represent the shareholder at a general meeting/payment of dividends.

### PERSONAL DATA WE PROCESS ABOUT YOU

Personal data of shareholders: personal data in the scope provided by Centrálny depozitár cenných papierov SR, a.s. (Central Securities Depository of Slovak Republic), banking data, as well as other data in compliance with the rules for payment of dividends.

Empowered person/statutory representative: personal data included in a power of attorney, application for payment of dividends, extract from the Commercial Register or any other register in which the shareholder is registered.

### RULES ON PERSONAL DATA PROTECTION

Your personal data are processed by the Company in order to ensure implementation and fulfilment of obligations resulting from and originating as a result of actions taken by the Company's general meeting, and to allow exercise of your shareholder rights (such as participation and voting at the Company's general meeting, payment of dividends), following the Act on Securities and Investment Services<sup>1</sup>).

Your personal data are only processed in compliance with statutory requirements stipulated in the Regulation<sup>2</sup> or Act on Personal Data Protection.<sup>3</sup> We process your personal data on a legal basis resulting from special regulations mentioned above (Article 6(1) c) of the Regulation).

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.

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

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<sup>1</sup> Act No. 566/2001 Coll. on Securities and Investment Services and on amendment and supplementation of certain acts (Act on Securities) as amended.

<sup>2</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>3</sup> Act No. 18/2018 Coll. on Personal Data Protection and on amendment and supplementation of certain acts

institutions, if so prescribed by special regulations.<sup>4</sup>

We may share your personal data with processors entrusted with processing of personal data on behalf of the Company. In such cases, processors may use your personal data only for defined purposes and only in compliance with our instructions and based on a concluded contract on processing.

The Company has entrusted the following processors for purposes of dividends payment:  
Poštová banka, a.s., Dvořákovo nábrežie 4, 811 02 Bratislava, Identification No.: 31 340 890, registered in the Commercial Register of the District Court Bratislava I, Section: Sa, Insert No.: 501/B,  
Cromwell a.s., Lamačská 22, 841 03 Bratislava, Identification No.: 31 353 746, registered in the Commercial Register of the District Court Bratislava I, Section: Sa, Insert No.: 4607/B,  
Slovenská pošta, a.s., Partizánska cesta 9, 975 99 Banská Bystrica, Identification No.: 36 631 124, registered in the Commercial Register of the District Court Banská Bystrica, Section: Sa, Insert No.: 803/S.

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 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 and maintain your personal data during existence of the relationship between the Company and you as the Company's shareholder and for a period inevitable for the fulfilment of rights and obligations of the Company resulting from such relationship and from relevant legal regulations. Documents shall become part of a registry record and shall be handled on such date and in such manner as stipulated in the provisions of Act No. 395/2002 Coll. on Archives and Registries as amended. 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.).

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

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<sup>4</sup> 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.

contact in order to exercise your rights.

Contact details of the Data Protection Officer: Entry Net, s.r.o.

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](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.