

Personal Data Protection

1. Privacy Policy

HMH, s.r.o., with registered office at Tavarikova osada 39, 841 02 Bratislava, ID No. 31 356 273 (hereinafter referred to as the "Controller"), in accordance with Regulation 2016/679 GDPR on the protection of data subjects with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the "Regulation") and Act No. 18/2018 Coll. on the protection of personal data and on the amendment and supplementation of certain acts (hereinafter referred to as the "Act"), has developed security measures that are regularly updated. They define the scope and method of security measures necessary to eliminate and minimize threats and risks acting on the information system in order to ensure the following:

- the availability, integrity and reliability of management systems using the latest information technologies, to protect personal data from loss, damage, theft, modification, destruction and to preserve their
- confidentiality,
- identify and prevent potential problems and sources of disruption.

Contact person in charge of personal data processing: gdpr@hmh.sk

2. Privacy Policy

Your personal data will be stored securely, in accordance with the data retention policy and only for as long as necessary to fulfil the purpose of the processing. Only persons authorized by the Controller to process personal data and who process personal data on the basis of the Controller's instructions shall have access to personal data. Your personal data will be backed up in accordance with the retention policy of the Controller. The personal data stored on backup storage sites are used to prevent security incidents that could arise, in particular through a breach of security or damage to the integrity of the processed data.

3. Definition of Terms

- 3.1 **"personal data"** means any information relating to an identified or identifiable natural person (hereinafter referred to as "the data subject"); an identifiable natural person is a person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier, or by reference to one or more elements specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- 3.2 **"processing"** means an operation or set of operations involving personal data or sets of personal data, such as the acquisition, recording, organization, structuring, storage, processing or alteration, retrieval, consultation, use, transmission, dissemination or otherwise making available, regrouping or combination, restriction, erasure or destruction, whether carried out by automated or non-automated means;
- 3.3 **"restriction of processing"** is the marking of stored personal data in order to limit their processing in the future;
- 3.4 **"profiling"** is any form of automated processing of personal data consisting in the use of such personal data to evaluate certain personal aspects relating to a natural person, in particular the analysis or anticipation of aspects of the natural person concerned relating to performance at work, financial circumstances, health, personal preferences, interests, reliability, behavior, location or movement;
- 3.5 **"information system"** means any structured set of personal data accessible according to specified criteria, whether centralized, decentralized or distributed on a functional or geographical basis;
- 3.6 **"controller"** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where

the purposes and means of such processing are laid down in Union law or in the law of a Member State, the controller or the specific criteria for determining the controller may be determined in Union law or in the law of a Member State;

- 3.7 **“processor”** means a natural or legal person, public authority, agency or other entity that processes personal data on behalf of the controller;
- 3.8 **“third party”** means a natural or legal person, a public authority, an agency or an entity other than the data subject, the controller, the processor and persons who are entrusted with the processing of personal data on the direct authority of the controller or processor;
- 3.9 **“the data subject's consent”** is any freely given, specific, informed and unambiguous expression of the Data Subject's will to which he or she consents in the form of a declaration or unambiguous confirmatory action to the processing of personal data relating to him or her;
- 3.10 **“personal data breach”** means a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to, personal data that is transferred, stored or otherwise processed;
- 3.11 **“relevant and reasoned objection”** means an objection to a draft decision as to whether there has been an infringement of this Regulation or whether the envisaged measure in relation to the controller or processor is in accordance with this Regulation, which must clearly demonstrate the seriousness of the risks posed by the draft decision as regards the fundamental rights and freedoms of data subjects and, where applicable, the free movement of personal data within the Union.

4. Purposes of the Processing of Personal Data

4.1 The Performance of a Contract to Which the Data Subject is a Party or to Take Pre-contractual Measures at the Request of the Data Subject

The personal data we process about our customers is processed on the basis of a contract pursuant to Article 6, Par. 1(b) of the Regulation (*processing is necessary for the performance of a contract to which the data subject is a party or to carry out pre-contractual measures at the request of the data subject*). Scope of personal data processed: title, name, surname, address, signature, telephone and e-mail. Subsequently, they are stored in accordance with Act No. 395/2002 Coll. on Archives and Registers. Personal data is **not** transferred to a third country. Personal data **will not be** used for automated individual decision-making, including profiling.

4.2 Records of Requirements

The personal data that we process via the contact forms on our website and emails are only processed to process your request. By completing and submitting the application, you consent to the processing of personal data pursuant to Article 6, Par. 1(a) of the Regulation (*the data subject has consented to the processing of his or her personal data for one or more specific purposes*). Scope of processed personal data: name, surname, address, telephone, e-mail. The personal data will be stored only until the purpose for which it was processed has been fulfilled. Where retention periods under commercial and tax law must be observed, the retention period is governed by Act No 395/2002 Coll. on archives and registers. Personal data is **not** transferred to a third country. Personal data **will not be** used for automated individual decision-making, including profiling.

4.3 Processing of Accounting Documents

The processing is necessary for compliance with a legal obligation of the controller pursuant to Article 6, Par. 1(c) of the Regulation. Scope of personal data processed: title, name, surname, address, telephone, account number, e-mail and signature. Subsequently, they are stored in accordance with Act No. 395/2002 Coll. on Archives and Registers. Personal data is **not** transferred to a third country. Personal data **will not be** used for automated individual decision-making, including profiling.

4.4 Register of Complaints

The personal data of data subjects who claim the protection of their rights or legitimate interests or point to specific deficiencies, in particular to infringements of legal provisions, of which

the removal requires the intervention of a competent authority we process pursuant to Article 6, Par. 1(c) of the Regulation (*processing is necessary for compliance with a legal obligation of the Controller*). Scope of personal data processed: name, surname, address, telephone, e-mail and signature. They are then stored for 5 years. Personal data is **not** transferred to a third country. Personal data **will not be** used for automated individual decision-making, including profiling.

4.5 ATP Journal

Free mailing of the ATP Journal to the specified postal address. Personal data will only be processed for the purpose of sending the magazine to the address you have provided. We process personal data pursuant to Article 6, Par. 1(a) of the Regulation. Your personal data will be processed until you unsubscribe. Scope of personal data processed: title, first name, last name, contact and e-mail address. Your personal data is processed for the purpose of delivering the magazine by the following processors:

- L.K. Permanent, spol. s r.o., Hattalova 12 831 03 Bratislava, ID No. 31 352 782
- ui 42 spol. s r.o., Sibírska 62 831 02 Bratislava, ID No. 35 713 003

Personal data is **not** transferred to a third country. Personal data **will not be** used for automated individual decision-making, including profiling.

4.6 Recovery of Receivables

In the case of debt recovery, personal data are processed pursuant to Article 6(1)(a) of Directive 95/46/EC. 1(c) of the Regulation. Scope of processed personal data: name, surname, birth number, address, telephone, e-mail. Subsequently, they are stored in accordance with Act No. 395/2002 Coll. on Archives and Registers. Personal data is **not** transferred to a third country. Personal data **will not be** used for automated individual decision-making, including profiling.

4.7 Financial Enforcement

The processing of personal data is necessary for the fulfilment of the legal obligation of the Controller pursuant to Article 6 para. 1(c) of the Regulation. Scope of personal data processed: routine personal data, other personal data discovered or provided in the course of the proceedings. Subsequently, they are stored in accordance with Act No. 395/2002 Coll. on Archives and Registers. Personal data is **not** transferred to a third country. Personal data **will not be** used for automated individual decision-making, including profiling.

4.8 Register of Jobseekers

The processing of personal data of job applicants is carried out on the basis of "**Consent**" to the processing of personal data pursuant to Article 6(1)(a) of the Regulation, which is provided by the applicant. Only successful applicants will **be contacted** by the Controller. Personal data is retained for a period of 12 months from the date of consent.

Personal data is **not** transferred to a third country. Personal data **will not be** used for automated individual decision-making, including profiling.

You have the right to withdraw your consent to the processing of your personal data at any time before the expiry of the above-mentioned period by sending a request to the email address: gdp@hmk.sk or by sending a request to the address of the Controller with the text "GDPR Withdrawal of Consent" on the envelope. The Controller declares that in the event of a written request from the data subject to terminate the processing of personal data before the aforementioned period, the personal data will be deleted within 30 days of receipt of the withdrawal of consent.

4.9 Newsletter

If you wish, you can subscribe to our newsletter, which is located on our website www.atpjournalsk, www.atpjournalsk. Personal data will only be processed for the purpose of sending newsletter messages to the e-mail address you have provided. By subscribing to the newsletter **you consent to** the processing of your personal data. Personal data are processed within the meaning of Article 6, Par. 1(a) of the Regulation. Your email address will be processed until you unsubscribe. You can unsubscribe by clicking on the "unsubscribe" link provided in every newsletter message you receive from us. After unsubscribing, you will no longer receive any newsletter messages from us.

Scope of personal data processed: email address. Personal data is **not** transferred to a third country. Personal data **will not be** used for automated individual decision-making, including profiling.

4.10 Marketing

The personal data we process about our customers for marketing purposes is processed on the basis of the data subject's consent pursuant to Article 6, Par. 1(a) of the Regulation. Scope of personal data processed: name, surname, address, telephone, e-mail and signature. They are then stored for 2 years. Personal data is **not** transferred to a third country. Personal data **will not be** used for automated individual decision-making, including profiling.

4.11 Register of Representatives of Suppliers and Customers

The processing of personal data of suppliers and customers is carried out in accordance with the legitimate interests of the controller, in accordance with Article 6, Par. 1(f) of the Regulation. Scope of personal data processed: title, first name, surname, job classification, job title, functional classification, employee's personal number, department, place of work, telephone number, fax number, e-mail address to the workplace and employer identification data. They are then retained for 10 years after the end of the contract or business relationship. Personal data is **not** transferred to a third country. Personal data **will not be** used for automated individual decision-making, including profiling.

4.12 Direct Marketing

We process the personal data we process about our customers for marketing purposes on the basis of the legitimate interest of the Controller pursuant to Article 6, Par. 1(f) of the Regulation. Scope of personal data processed: name, surname, telephone and e-mail. They are subsequently stored for the duration of the contractual or business relationship between the client and the controller. Personal data is **not** transferred to a third country. Personal data **will not be** used for automated individual decision-making, including profiling.

5. Rights of the Data Subject

5.1 **Right to withdraw consent** - where we process your personal data on the basis of your consent, you have the right to withdraw that consent at any time. You may withdraw your consent electronically, at the address of the person in charge, in writing, by notice of withdrawal of consent or in person at our registered office. Withdrawal of consent does not affect the lawfulness of the processing of personal data we have processed about you on the basis of that consent.

5.2 **Right of access** - you have the right to be provided with a copy of the personal data we hold about you, as well as information about how we use your personal data. In most cases, it will be provided to you in writing in paper form, unless you request otherwise. If you have requested this information by electronic means, it will be provided electronically where technically feasible.

Right to rectification - we take reasonable steps to ensure that the information we hold about you is accurate, complete and up to date. If you believe that the information we hold is inaccurate, incomplete or out of date, please do not hesitate to ask us to correct, update or supplement this information.

5.4 **Right to erasure** (to be forgotten) - you have the right to ask us to erase your personal data, for example, if the personal data we have collected about you is no longer necessary for the fulfilment of the original purpose of the processing. However, your right must be assessed in the light of all relevant circumstances. For example, we may have certain legal and regulatory obligations, which means that we will not be able to grant your request.

5.5 **Right to restriction of processing** - in certain circumstances, you are entitled to ask us to stop using your personal data. For example, if you think that the personal data we hold about you may be inaccurate or if you think that we no longer need to use your personal data.

5.6 **Right to data portability** - in certain circumstances, you have the right to ask us to transfer the personal data you have provided to us to another third party of your choice. However, the right to portability only applies to personal data we have obtained from you on the basis of your consent or under a contract to which you are a party.

5.7 **Right to object** - you have the right to object to processing based on our legitimate interests. If we do not have a compelling legitimate ground for processing and you object, we will no longer process your personal data.

If you believe that any personal information we hold about you is incorrect or incomplete, please contact us.

If you wish to object to the way in which we process your personal data, please contact our Data Protection Supervisor by email at: gdpr@hmh.sk or in writing to:

HMH, s.r.o.

Tavarikova osada 39

841 02 Bratislava

Our designated person will review your objection and work with you to resolve the matter.

If you believe that your personal data is being processed unfairly or unlawfully, you may file a complaint with the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27; telephone number: +421 /2/ 3231 3214; e-mail: statny.dozor@pdp.gov.sk, <https://dataprotection.gov.sk>.

Revised on 01.09.2021