

PRIVACY POLICY

pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (hereinafter the "GDPR")

We are committed to protecting your privacy, so please allow us to provide you with information about, in particular, how we process your personal data, what personal data we process, for what purposes and on what legal basis, what rights you have in relation to the protection of the processing of your personal data, to whom your personal data may be disclosed or made accessible, and other important information. If you have any questions about the protection of your personal data, you can contact us at any time using the contact details provided. We process your personal data in accordance with the GDPR and the relevant provisions of Act No. 18/2018 Coll. on the Protection of Personal Data and on amendment and supplementation of certain acts, as amended (hereinafter the "PDPA").

1. WHO IS THE CONTROLLER OF YOUR PERSONAL DATA?

Logamic s.r.o., registered office: Račianska 17, Bratislava – mestská časť Nové Mesto 831 02, Company ID: 46 564 985, registered in the Commercial Register of the Bratislava I District Court, Section: Sro, Insert no.: 79661/B, and other **UDRZATEL GROUP companies** (hereinafter the "**Controller**" or the "**Company**").

2. WHO CAN I CONTACT IF I HAVE QUESTIONS?

We are committed to protecting your privacy, so please allow us to provide you with information about, in particular, how our Company processes your personal data, what personal data we process, for what purposes and on what legal basis, what rights you have in relation to the protection of the processing of your personal data, to whom your personal data may be disclosed or made accessible, and other important information.

If you have any questions about the protection of your personal data, you can contact us at any time using the contact details above or you can write to us at the registered office of our Company, or visit us in person at the registered office between 8.00 a.m. and 3.00 p.m. on week days.

Contact details:
+421 910 872 944/info@logamic.com

3. DEFINITIONS

"**PD**" is personal data (including the plural); "**DS**" is data subject (including the plural); "**NP**" is natural person (including the plural);

4. IN WHAT SITUATIONS WILL THE CONTROLLER PROCESS YOUR DATA?

We only process your PD without your consent where applicable legal regulations allow us to do so. PD that you disclose to us under a contract, special regulation or legitimate interest must be disclosed to us, otherwise we will be unable to fulfil your or our obligations for that purpose. Without this information, we will not be able to enter into an employment contract or a non-employment work agreement with you.

We process your PD mainly to fulfil our legal obligations as your employer in the performance of our legal obligations as an employer, in particular in the field of tax and social security law, and to fulfil our obligations under accounting regulations (keeping accounting records, managing accounting documents), to ensure your security and to enable you to exercise your rights.

If we process your PD on the basis of the exercise of our legitimate interest within the meaning of Art. 6(1)(f) of the GDPR, you have the right to object to the processing of your PD at any time. Further, the Controller will not process your PD unless it demonstrates compelling legitimate grounds for processing that override the interests, rights and freedoms of the DS or grounds for establishing, exercising or defending legal claims. In order for the Controller to exercise its legitimate interest, the DS is obliged to disclose his or her personal data. Failure to disclose the necessary personal data may result in the NP not being admitted to the Controller's premises.

We only process your PD in the following cases and on the following legal bases:

PURPOSE OF PERSONAL DATA PROCESSING	LEGAL BASIS	STORAGE PERIOD
<p><i>If you are our employees, but also in some cases spouses of employees, dependent children of employees, parents of dependent children of employees, close relatives of employees or our former employees, we process your PD within the scope of common data and special categories of PD, in particular name, surname, maiden name and title, birth number, date and place of birth, signature, marital status, nationality, citizenship, permanent residence, temporary residence, gender, education data, legal capacity, receipt of child benefits, wage, salary or salary conditions and other financial entitlements granted in the course of employment, data on time worked, data on the bank account of a natural person, amounts affected by the execution of a decision ordered by a court or administrative authority, fines and penalties as well as compensation imposed on an employee by an enforceable decision of the competent authorities, unduly received amounts of social insurance benefits and old-age pension benefits or their advances, state social benefits, benefits in material need and contributions to benefits in material need, cash contributions to compensate for the social consequences of severe disability which the employee is obliged to repay on the basis of an enforceable decision under a special regulation, the annual total of the pension paid, data on incapacity for work, data on major personal impediments to work, data on modified capability for work, data on employers, job classification and the date on which the work activity started, data on family members within the scope of name, surname, address, date of birth, data on spouse, children, parents of children within the scope of name, surname, date of birth, birth number, address, data from the employment certificate, data on the employee's listing in the register of unemployed citizens, data on taking maternity and parental leave, data on the grant of a pension, type of pension, data from the employment contract of the supplementary pension insurance company, PD processed on receipts, certificates of passed examinations and educational activities, data in the CV for:</i></p>		
Fulfilling the employer's obligations related to employment, a similar relationship.	Art. 6(1)(b) GDPR – performance of contractual relations (employment contract and non-employment work agreements).	<ul style="list-style-type: none"> Employee personal files: 70 years.
Social security levies.	Art. 6(1)(c) GDPR – fulfilling the employer's legal obligations (e.g. to social security, health insurance, tax obligations, employer's wage policy, fulfilling the employer's OSH obligations): <ul style="list-style-type: none"> • Act No. 311/2001 Coll., the Labour Code, as amended, • Act No. 580/2004 Coll. on Health Insurance and on Amendment and Addition to Act No. 95/2002 Coll. on Insurance and on Amendments and Additions to Certain Acts, as amended, • Act No. 461/2003 Coll. on Social Insurance, as amended, • Act No. 595/2003 Coll. on Income Tax, as amended, • Act No. 43/2004 Coll. on Retirement Pension Savings, as amended, • Act No. 650/2004 Coll. on Supplementary Pension Savings and on Amendments and Additions to Certain Acts, as amended, • Act No. 5/2004 Coll. on Employment Services and on Amendments and Additions to Certain Acts, as amended, • Act No. 462/2003 Coll. on Income Compensation for Temporary Incapacity for Work of an Employee and on Amendments and Additions to Certain Acts, as amended, • Act No. 152/1994 Coll. on the Social Fund and on Amendment and Addition to Act No. 286/1992 Coll. on Income Taxes, as amended, • Act No. 355/2007 Coll. on the Protection, Promotion and Development of Public Health and on Amendments and Additions to Certain Acts, as amended, • Act No. 124/2006 Coll. on Occupational Safety and Health and on Amendments and Additions to Certain Acts, as amended, • other relevant legal regulations 	<ul style="list-style-type: none"> Attendance records (daily, weekly, monthly): 2 years.
Health insurance levies.		<ul style="list-style-type: none"> Records of employees incapable for work: 3 years. Records of entries, exits, terminations: 5 years.
Employer's wage policy.		<ul style="list-style-type: none"> Occupational safety and health: 5 years after termination or cessation of the obligation. Job descriptions: 5 years.
Fulfilling tax obligations.		<ul style="list-style-type: none"> Records of retraining and acquisition of professional qualifications: 10 years. Work performance agreements: 5 years.
Employee attendance records.		<ul style="list-style-type: none"> Benefits, applications, opt-outs, changes: 10 years. Incapacity for work – records, statistics: 5 years.
Fulfilling the employer's OSH obligations, recording of possible work accidents.		<ul style="list-style-type: none"> Maternity leave and unpaid leave – records: 5 years. Wage scale: 20 years. Payroll: 10 years.

in conjunction with an exception to the prohibition:

Art. 9(2)(b) and (h) GDPR in conjunction with Section 78(5) of the PDPA (special legal regulation).

- Records of advance tax and wage tax paid: 10 years.
- Settlement of sickness insurance benefits: 10 years.
- Wage tax declarations: 5 years.

If you are a person registered in the database of IT experts, we process your PD within the scope of common PD, in particular: name, surname, email address, information on professional orientation, other data published on the social network – data obtained during the first contact on the LinkedIn social network, billing data, contact data, including telephone number – data necessary for cooperation and invoicing.

Use of the IT expert database for the provision of outsourced IT services; hiring of IT experts and performance of contractual rights and obligations towards IT experts.

Art. 6(1)(b) GDPR – performance of contractual and pre-contractual relations with the data subject (cooperation on specific projects for LOGAMIC clients).

10 years after the end of the cooperation

If you are a client, we process your PD within the scope of common PD such as name, surname, contact details, and data in particular within the scope of Section 78 (3) of the Personal Data Protection Act, or other data that are necessary for the performance of contractual relations:

Fulfillment of rights and obligations arising from contractual relations with the Controller's clients/customers to whom the Controller's services are provided.

Art. 6(1)(b) GDPR – performance of contractual and pre-contractual relations (if the contracting party is a natural person).

Art. 6(1)(f) GDPR – processing is necessary for the purposes of the legitimate interests of the Controller.

Until the termination of the contractual relationship and until the expiration of the applicable limitation, prescription, claim, retention and other similar periods provided for by legal regulations or conventions of the contracting parties, namely until the expiration of the last of these periods.

If you are our suppliers, customers, employees of the Controller and its other representatives, employees and representatives of suppliers and customers, other relevant natural persons, we process common PD about you, in particular common data: name, surname, title, address of permanent/temporary residence, telephone number, e-mail, date of birth, type and number of identity document, signature, bank account number, amount of receivable/payable, other data necessary for the proper maintenance of the accounting agenda:

Fulfilling obligations arising from accounting regulations, maintaining the accounting agenda, managing accounting documents.

Art. 6(1)(c) GDPR – processing is necessary to fulfil the legal obligation of the Controller (Act No. 431/2002 Coll. on Accounting, Act No. 222/2004 Coll. on Value Added Tax, Act No. 40/1964 Coll., the Civil Code, Act No. 152/1994 Coll. on the Social Fund, Act No. 286/1992 Coll. on Income Taxes, Act No. 311/2001 Coll., the Labour Code).

Statutory periods (10 years).

If you are a DS relevant for network security reasons, we process your PD within the scope of common data, in particular data collected from networks for:

Ensuring the network security of the Controller for the protection of the processed data.

Art. 6(1)(f) GDPR – the exercise of the Controller's legitimate interest.

5 years (objective period of the Office for Personal Data Protection).

If you are a cooperating person who has signed an assistance contract, we process your PD within the scope of common data, in particular name, surname, address, date of birth, number of ID card or other identity document, nationality – the data specified in the assistance contract for:

Fulfillment of rights and obligations under the assistance contract.

Art. 6(1)(b) GDPR – fulfilment of contractual and pre-contractual relations with the data subject (assistance contract).

10 years after the end of the cooperation

If you are an NP exercising your rights as a DS, we process your PD within the scope of common data, in particular title, name, surname, address, email address and other personal data to which the exercised right of the data subject or security incident relates to, namely for:

Recording of personal data necessary for the purposes of fulfilling the obligations set out in the GDPR, in particular for the

Art. 6(1)(f) GDPR – the exercise of the Controller's legitimate interest in the fulfilment of obligations under the GDPR.

5 years (objective period of the Office for Personal Data Protection).

recording and handling of data
subjects' rights and the recording of
security incidents.

We will delete your PD immediately after the specified periods, unless we have other legal basis for their further storage.

We may also process your PD on the basis of your consent, which we may ask you for in any such operation. Providing consent is voluntary, i.e. it is your decision whether or not to disclose PD to us. If you give us your consent, you can subsequently withdraw it at any time. We can process your PD in the following cases only with your consent:

PURPOSE OF PERSONAL DATA PROCESSING	LEGAL BASIS	STORAGE PERIOD
<i>If you are a person registered in the database of IT experts, we process your PD within the scope of common data such as name, surname, email address, information about professional orientation, other data published on the social network – data obtained during the first contact on the LinkedIn social network, namely for:</i>		
Creating a database of IT experts for potential collaboration on IT projects.	Art. 6(1)(a) GDPR – consent to the processing of personal data for the purposes of maintaining a database of IT experts as well as disclosing it to other entities so that they can approach you with an offer of cooperation.	Until consent is withdrawn, not more than 3 years.

5. WHAT PERSONAL DATA DO WE PROCESS ABOUT YOU?

In particular, we process common PD about you that you disclose to us or that we obtain from other sources, electronically through email communication, via LinkedIn, by post or by other means.

We only process a special category of PD about you, so-called sensitive PD, in the fulfilment our obligations as an employer in the context of an employment relationship based on a relevant legal basis in conjunction with a relevant exception to the prohibition on processing sensitive data pursuant to Article 9(2) of the GDPR.

We process medical records and information about you only and exclusively on the basis of specific legal regulations that impose this obligation on us, in particular in the field of labour law, social security law and social protection law, and insofar as it is necessary for the purposes of preventive and occupational medicine, the assessment of the employee's capacity for work.

6. FOR HOW LONG WILL WE PROCESS YOUR PERSONAL DATA?

We will store your PD for no longer than is necessary for the purposes for which the PD is processed. When storing PD, we are governed by specific regulations that set storage periods for us and/or the GDPR's basic principles regarding the storage and disposal of PD. If you have disclosed your data to us on the basis of consent, we will only process it for the period of validity of the consent or only until it is withdrawn.

7. WHAT ARE THE SOURCES OF THIS INFORMATION?

Your PD is generally collected directly from you during the duration of the employment or similar relationship (business relationship with a self-employed person pursuant to Act No. 455/1991 Coll., the Trade Business Act, as amended). In some cases, your PD is also obtained from other sources as a result of legal regulations. This includes, in particular, enquiries regarding the disclosure of relevant tax information from the tax office, as well as information on periods of incapacity for work from the relevant health insurer. In addition, we may receive data from third parties (such as courts). If the PD does not come from the DS, and as our employee you disclose it to us for one of the purposes, you are obliged to inform the DS (e.g. family members in the case of claiming a recreation allowance, claiming a tax bonus for a child, etc.), whose PD you have disclosed to us, about the conditions of processing of their PD by the Controller.

If the Controller obtains PD about a DS from another NP, the NP represents that he/she is doing so as the DS's attorney/representative and/or has the DS's written consent to do so. At the same time, it is obliged to inform the DS whose PD it has disclosed to the Controller about the facts of the processing of their PD by the Controller.

8. WHO IS THE RECIPIENT OF THE PERSONAL DATA?

We only disclose your PD in justified cases, and only to the scope necessary to the following categories of recipients:

- our contractual partners that we need for our day-to-day operations, in particular IT suppliers (email accounts, IT administrator), OSH, Fire Protection and OHS provider, external personnel management and wage accounting

company, archive administrator, company that handles marketing activities, website administrator, social networks (LinkedIn),

- to other entities in cases where the right or obligation to disclose your PD is imposed on us by legal regulations (e.g. to the Social Insurance Agency, health insurance companies, professional bodies), or where it is necessary to protect our legitimate interests (e.g. to the courts, the police, etc.),
- to companies within the UDRZATEL GROUP, in particular for the purposes of corporate control, internal communication and other administrative and statistical purposes, on the basis of Art. 6(1)(f) of the GDPR (the Controller's legitimate interest in the transfer of personal data within the group of companies pursuant to rec. 48 in conjunction with rec. 37 GDPR),
- to other entities on the basis of your consent, so that they can approach you in the same way as we did with an offer of cooperation on IT projects.

We may also disclose your PD to other recipients if you consent or instruct us to disclose your PD.

Your personal data will be processed within the UDRZATEL GROUP, which comprises the following companies: Udrzatel s.r.o., Company ID: 54008476, Roksho s.r.o., Company ID: 54067235, Logamic s.r.o., Company ID: 46564985.

9. AUTOMATED DECISION-MAKING AND PROFILING

Your PD is not and will not be used for automated individual decision-making or profiling.

10. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

We do not transfer your PD to third countries outside the EU that do not provide an adequate level of protection of PD.

11. WHAT RIGHTS DO YOU HAVE IN THE PROCESSING OF YOUR PERSONAL DATA?

If we process your personal data **on the basis of the exercise of legitimate interest within the meaning of Art. 6(1)(f) GDPR**, you have:

- **the right to object** – you have the right to object at any time, on grounds relating to your particular situation, to the processing of PD concerning you.

If we process your personal data **on the basis of your consent within the meaning of Art. 6(1)(a) GDPR**, you have:

- **the right to withdraw consent** – you have the right to withdraw your consent to the processing of PD for the purpose for which you have given your consent at any time.

Your other rights include:

- **right of access** – you can ask us for access to the PD we process about you. The Controller shall also provide a copy of the processed PD.
- **right to rectification** – you can ask us to correct inaccurate or incomplete PD that we process about you.
- **right to erasure** – you may ask us to erase your PD if any of the following occurs: (i) the PD is no longer necessary for the purposes for which it was collected or otherwise processed; (ii) your PD has been unlawfully processed; (iii) your PD must be erased in order to comply with a legal obligation under Union or Member State law to which the Controller is subject.
- **right to restriction of processing** – you can ask the Controller to restrict the processing of your PD if any of the following situations occur: (i) you have denied the accuracy of the PD for the time necessary for the Controller to verify the accuracy of the PD; (ii) the processing of your PD is unlawful, but you refuse to erase the PD and instead request a restriction on its use; (iii) the Controller no longer needs the PD for the purposes of the processing, but you require it for the establishment, exercise or defence of legal claims; (iv) you have raised an objection to the processing of your PD pursuant to Art. 21(1) GDPR until it is verified that the Controller's legitimate grounds override your legitimate grounds.

- **right to data portability** – if we process your PD on the basis of your consent or because it is necessary for the performance of a contract to which you are a party and at the same time it is processed by automated means of processing, you have the right to obtain the PD concerning you that you have disclosed to the Controller in a structured, commonly used and machine-readable format, provided that this right shall not adversely affect the rights and freedoms of other persons.
- **right to object** – you have the right to lodge a complaint with the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27, www.uoou.sk.

12. HOW CAN THE DATA SUBJECT EXERCISE HIS/HER RIGHTS?

The DS may exercise his/her rights orally, in writing or electronically, using the contact details above. We will provide you without undue delay with information on the measures taken in response to your request, at the latest within one month of receipt of your request. The Controller may request the disclosure of the additional information necessary to confirm the identity of the DS if it has reasonable doubts about the identity of the natural person who has exercised his or her rights through a request for the exercise of DS rights. It is the responsibility of the Controller to prevent the disclosure of personal data to an unauthorised person. If we need to extend this period in justified cases, we will inform you in due time. If a request to exercise DS rights would be manifestly unfounded or unreasonable, in particular due to its repetitive nature, we may refuse to process your request or we may charge you a reasonable fee taking into account our administrative costs in processing it.