Personal data processing principles and data protection system under the GDPR



prepared in accordance with 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 within the meaning of Articles 13 and 14 of the Regulation (hereinafter referred to **as "GDPR"**) and Act No. 18/2018 Coll. on the Protection of Personal Data (hereinafter referred to **as "Personal Data Protection Act"**)

Operator:

Recable, s.r.o.

Trencianske Jastrabie 463

913 22 Trenčianske Jastrabie

ICO: 53 667 131

E-mail: info@re-cable.sk

(hereinafter referred to as "**Operator**")

What is personal data?

Personal data are data relating to an identified natural person or an identifiable natural person who **can be identified, directly or indirectly, in particular by reference to a commonly identifier**, to another identifier such as a first name, a surname, an identification number, location data or an online identifier, or to one or more characteristics or attributes which constitute his or her physical identity, physiological identity, genetic identity, psychological identity, mental identity, economic identity, cultural identity or social identity.

What is personal data processing?

Processing of personal data means a processing operation or set of processing operations concerning personal data or sets of personal data, in particular the obtaining, recording, organisation, structuring, storage, alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise, alignment or combination, restriction, erasure, whether or not by automated or non-automated means.

The Operator (Administrator) is not obliged to appoint/designate a Responsible Person.

Sources and categories of personal data:

The controller processes personal data (directly from you) that you have provided to it or personal data that it has obtained on the basis of the fulfilment of your order.

Your identification and contact details and data necessary for the performance of the contract

Lawful basis and purpose of processing:

The lawful reason for the processing is:

Your consent to the processing of your personal data for the purpose of providing direct marketing pursuant to Article 6(1)(a) GDPR

Performance of the contract between you and the controller pursuant to Article 6(1)(b) GDPR

The processing is necessary for compliance with a legal obligation of the controller pursuant to Article 6(1)(c) of the GDPR

The purpose of processing personal data is:

Provision of investment services and related

Processing your order and exercising the rights and obligations arising from the contractual relationship between you and the operator. When ordering services, personal data is required for the successful performance of the contract pursuant to Article 6(1)(b) of the Regulation (this includes the subsequent payment, delivery of goods or services, handling of complaints, etc.); the processing of the customer's personal data takes place ***without the customer's consent*****,** since the legal basis for the processing of their personal data for the purposes of the performance of the contract is the specific contract between the customer and the operator. **The provision of personal data is a necessary requirement for the conclusion and performance of the contract**; without the provision of personal data, it is not possible to conclude the contract or for the controller to fulfil its terms.

In order to maintain full transparency, we would like to inform you that we will assess the accuracy of the personal data provided (if circumstances allow). If we become aware of incorrect personal data or information stored in our information system, we will immediately correct, restrict processing or delete the personal data.

If such data is disclosed, we will inform all parties involved.

There is no automated individual decision-making on the part of the controller within the meaning of Article 22 of the GDPR.

Retention period:

The controller stores personal data

For as long as necessary to exercise the rights and obligations arising from the contractual relationship between you and the controller and to assert a claim arising from that contractual relationship.

After the expiration of the period of storage of personal data resulting from Act No. 395/2002 Coll., the Act on Archives and Registers and on the Amendment of Certain Acts, the operator shall delete the personal data.

Recipients of personal data

Who is the beneficiary?

The recipient **is anyone to** whom the **personal data is disclosed**, regardless of whether they are a third party. A public authority which processes personal data on the basis of a specific regulation shall not be considered a recipient.

They are persons who are involved in the delivery of goods, services, making payments on the basis of a contract.

The controller does not provide, disclose or make available personal data to third countries.

Terms and conditions for the security of personal data

The controller declares that it has taken appropriate personal, technical and organisational measures to ensure the protection of personal data.

The controller has taken technical measures to secure the data storage and storage of personal data in file form.

The controller declares that the personal data can only be accessed by persons authorised by the controller.

Your rights :

- Right of access to your personal data under Article 15 GDPR

- Under the conditions set out in the GDPR you have:

Right to rectification of personal data under Article 16 GDPR

- Right to restriction of processing

- Right to erasure under Article 17 GDPR

- Right to object under Article 21 GDPR

- The right to the transfer of personal data under Article 21 of the GDPR

- The right to withdraw consent (electronically or to a mailing address)

- The right to lodge a complaint with the Data Protection Authority if you believe that your data protection rights have been violated.

You also have the right to lodge a complaint with the Data Protection Authority if you believe that your data protection rights have been violated

How can you exercise your rights?

Right of access to data

You have the right to know whether we are processing your personal data. If we are processing it, you can ask us for access to it. Upon your request, we will issue a confirmation with information about the processing of your personal data. You can submit your request electronically, to the email address info@re-cable.sk or by post to the following address**: Recable, s.r.o., Trenčianske Jastrabie 463, 913 22 Trenčianske Jastrabie, ID No.: 53 667 131**

Right to repair

You have the right to have your personal data processed by us to be correct, complete and up-to-date. If your personal data is incorrect or outdated, you can ask us to correct or complete it electronically at the email address info@re-cable.sk or by mail to the following address**: Recable, s.r.o., Trenčianske Jastrabie 463, 913 22 Trenčianske Jastrabie, IČO: 53 667 131**

Right to erasure

In certain circumstances, you have the right to have your personal data erased by us. You can ask us to delete your data at any time. We will delete your personal data if:

- we no longer need your personal data for the purpose for which you provided it to us,

- you withdraw your consent,

- you object to the processing of your personal data,

- we process your personal data unlawfully,

- personal data must be erased in order to comply with a legal obligation,

if you are a child, or the parent of a child, who has consented to the processing of personal data via the internet.

Right to restriction of processing

You can ask us to restrict the processing of your personal data. If we comply with your request, we will only store your personal data and will not process it further. Restriction of the processing of your data will occur if

- notify us that your personal data is incorrect until we have verified its accuracy,

- we are processing your personal data unlawfully, but you do not consent to its erasure and instead request that we only restrict the processing of your personal data,

- We no longer need your data, but you need it to establish, exercise or defend your rights

- you object to the processing of your personal data until we have verified that our legitimate interests outweigh your reasons.

Right to data portability

You have the right to request that we provide you with your personal data in an electronic format (e.g. an XML or CSV file) that allows you to easily transfer your data to another company. You can also ask us to transfer your personal data directly to the company of your choice. We will comply with your request if you have provided us with the personal data directly and have given us your consent to process it.

Right to object

You have the right to object to us processing your personal data. If we process your personal data in the following cases:

- because of our legitimate interest,

- creating a customer profile,

- you can object to their processing if you have personal grounds for doing so.

How can you exercise these rights?

You can contact us with your request in any of the following ways:

in writing by e-mail: info@re-cable.sk or by post to the correspondence address **Recable, s.r.o., Trenčianske Jastrabie 463, 913 22 Trenčianske Jastrabie, ID No.: 53 667 131**

If you believe that your personal data protection rights have been violated, you have the right to file a complaint with the supervisory authority, the Office for Personal Data Protection, at the following address

Hraničná 12

820 07 Bratislava 27

Slovak Republic

Id:

ID: 36064220

VAT NUMBER: 2021685985

Secretariat of the Authority:

+421 /2 3231 3214

E-mail: statny.dozor@pdp.gov.sk

This Privacy Policy is effective as of 25.5.2018 and replaces the previous Privacy Policy.