



# GENERAL DATA PROTECTION REGULATION

JVS CONSULTING S.R.O.

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Nová Ves City District, Company ID: 35967935, Tax ID:  
2022102390, registered in the Commercial Register of the  
Municipal Court Bratislava III, Section: Sro, Insert No.: 38564/B,  
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## 1. INTRODUCTORY PROVISIONS

- 1.1 In the course of our business activities, we protect and properly ensure the security of the personal data we process. The processing of personal data is always carried out in compliance with applicable legal regulations of the Slovak Republic. This document contains detailed information regarding the personal data processed by our company and the purposes of such processing, as well as other important information concerning the rights of data subjects regarding personal data protection.
- 1.2 In the course of our business operations, we never transfer the personal data we process to parties outside our business. The foregoing does not apply in the following cases”
- Where data subject wishes to transfer their personal data to another controller and grants the company their express consent for such a transaction.
  - Where we are required to do so by applicable legal regulations.
  - Where we may act in such a manner based on our legitimate business interest.

## 2. PERSONAL DATA CONTROLLER

- 2.1 The personal data controller is the business entity to which personal data is provided and which determines the purpose and means of personal data processing on its own behalf.
- 2.2 The data controller of personal data of clients is:

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## 3. BASIC CONCEPTS

- 3.1 **Personal data** means data relating to an identified natural person who can be identified, directly or indirectly – particularly by reference to a generally applicable identifier or another identifier such as a first name, surname, identification number, location data, or the online identifier – or by reference to one or more factors specific

to the physical, physiological, genetic, psychological, mental, economic, cultural, or social identity of that natural person.

- 3.2 **A data subject** is any natural person whose personal data are being processed.
- 3.3 **Processing of personal data** means a processing operation or set of processing operations performed on personal data or on sets of personal data, such as collection, recording, organisation, structuring, storage, alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, or erasure, whether or not by automated means.
- 3.4 **A data controller** is anyone who, alone or jointly with others, determines the purpose and means of the processing of personal data and processes personal data on their own behalf.
- 3.5 **A data processor is anyone** who processes personal data on behalf of the controller.
- 3.6 **A data protection officer (DPO)** is a persona designated by the data controller or the data processor who performs tasks pursuant to the Act No. 18/2018 on the Protection of Personal Data and on Amendments and Supplements to Certain Acts.
- 3.7 **Profiling means** any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects or characteristics relating to a natural person, in particular to analyse or predict aspects or characteristics of the data subject concerning their work performance, economic situation, health and/or personal preferences, interests, reliability, behaviour, location or movements.
- 3.8 **The purpose of personal data processing** is the reason for which the controller processes the personal data of data subjects.
- 3.9 **A legitimate interest** is the interest of the data controller or another entity for whom personal data are processed. A legitimate interest according to the law prevails over the interest of the data subject.
- 3.10A recipient is any person to whom personal data are disclosed, regardless of whether that persona is a third party. A public authority that processes personal data pursuant to a specific legal regulation or an international treaty binding upon the Slovak Republic – in accordance with the personal data protection rules applicable to the specific purpose of the processing – is not considered a recipient.
- 3.11A **third country** is a country that is not a Member State.
- 3.12An **international organization** is an organisation and its subordinate entities governed by public international law, or any other entity established by an agreement between two or more countries or pursuant to such an agreement.

## 4. CATEGORIES OF PERSONAL DATA PROCESSED

- 4.1 The data controller processes only such personal data as are necessary for the proper provision of services to its clients. It duly protects the personal data being processed in accordance with the legal provisions applicable within the territory of the Slovak Republic and the European Union, and adheres to all legal prescribed procedures during such processing.
- 4.2 In order to improve the quality of the services provided, the data controller collects, stores, and archives the personal data of its clients and potential clients who have granted their express consent to this and who have granted their express consent to be contacted with offers of its services.
- 4.3 The company processes primarily the following categories of personal data:
- **Identification data.** The data controller processes personal data necessary for the purpose of concluding lease agreements and other contracts between clients and the company. The data controller processes, in particular, the following personal data: the organization's business name, the name and surname of the statutory representative, the name and surname of the contact person and/or responsible person, the person's job title, the organizations registered office, Company ID No., Tax ID No., and other important company information.
  - **Contact details.** The data controller processes the contact details of persons and organisations, including telephone numbers and email addresses.
  - **Services provided.** The data controller processes personal data containing information about the services provided by the data controller.
  - **Transaction data.** The data controller processes personal data related to payment transactions for the services provided, such as account numbers and other billing data in accordance with applicable legislation.

## **5. PURPOSE OF PERSONAL DATA PROCESSING**

### **5.1 The data controller processes the personal data of data subjects on the basis of the following two legal bases:**

- personal data for the processing of which the consent of data subjects is not required,
- personal data for the processing of which the consent of data subjects is required.

### **5.2 Processing of personal data based on a contract.** The data controller processes the personal data of data subjects for the purpose of concluding lease agreements and other contracts in which the data subjects act as clients of the services provided and the data controller acts as the supplier of the services provided. In such cases, personal data are always processed exclusively to the extent necessary for the conclusion and proper performance of the relevant contracts and the mutual rights and obligations arising therefrom. The provision of personal data of data subjects for this purpose is voluntary in each individual case. However, without such data, it is not possible to properly conclude the contract or perform the mutual contractual rights and obligations arising therefrom.

### **5.3 Processing of personal data on the basis of the data controller's legitimate interests.** The data controller also processes personal data on the basis of its legitimate interests. The data controller's legitimate interest includes the possibility of informing clients about new services that the data controller provides as a business entity. The data controller's legitimate interest also includes the processing of personal data of data subjects for the purpose of asserting any legal claims against them by the data controller as a business entity.

### **5.4 Processing of personal data for statistical purposes.** As part of improving the quality of the services provided, the data controller also processes the personal data of data subjects after the end of mutual cooperation for statistical purposes. Such personal data are processed in an anonymised form and therefore do not contain any information on the basis of which the data subject could be identified in any way.

### **5.5 Processing of personal data for marketing purposes.** The data controller also processes the personal data of data subjects for marketing purposes. In each individual

case, it requests the express consent of the data subject to the processing of their personal data for marketing purposes.

Consent to the processing of personal data is always voluntary. Under applicable and effective legislation, such consent must be given genuinely and freely, must be specific and informed, and must be made in the form of a statement or an unambiguous act by which the data subject clearly and distinctly expresses their consent (their will) to the processing of their personal data for the given (specific) purpose.

The voluntarily given consent of the data subject to the processing of their personal data may be withdrawn at any time, including only in part, at the address of the data controller:

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Instructions regarding the content of a withdrawal of consent to the processing of personal data for marketing purposes should include the following information:

- identification of the person withdrawing consent, including their first name, surname and email contact, or telephone number or other contact details,
- a clear and understandable statement that the data subject no longer wishes their personal data to be processed for marketing and/or other purposes in the future,
- consent may be withdrawn in full, or the withdrawal may specify the particular purposes to which it applies. In such a case, this constitutes a partial withdrawal of consent to the processing of personal data.

## 6. ARCHIVING OF PERSONAL DATA

- 6.1 The data controller normally retains the personal data of data subjects **for the duration of the concluded contracts**, and always only to the extent necessary to be able to provide services and fulfil its contractual obligations. After the termination of the contractual relationship and fulfilment of all mutual obligations, the data controller retains the personal data of data subjects only for the necessary period pursuant to the

applicable legal regulations, i.e. **10 years** from the conclusion of the relevant contractual relationship (Act No. 431/2002 Coll. on Accounting, as amended, and Act No. 40/1964 Coll., the Civil Code, as amended).

- 6.2 If the data subject enters into a contractual relationship with the data controller - as a business entity - and grants consent to the processing of personal data for marketing purposes, such consent is considered valid for the entire duration of the contractual relationship, or until the data subject withdraws it, and subsequently for a further **5 (in words: five) years** after the termination of the contractual relationship.
- 6.3 If the data subject has not entered into a contractual relationship with the data controller and has granted consent to the processing of personal data for marketing purposes, such consent is considered valid for a period of **5 (in words: five) years** from the date on which it was granted, or until the date on which it is withdrawn by the data subject.

## **7. SOURCES OF PERSONAL DATA**

- 7.1 The data controller obtains the personal data of data subjects from the **following sources**:
- voluntarily and directly from data subjects when concluding lease agreements and other contracts and during the duration of contractual relationships,
  - through voluntarily granted consent to the processing of personal data for marketing purposes,
  - from other entities to which the data subjects themselves have granted consent to the processing of personal data.

## **8. PERSONS WITH ACCESS TO PERSONAL DATA**

- 8.1 The data controller and the data processor have access to the personal data of data subjects on the basis of a written agreement concluded between the data controller and the data processor. Employees of the data controller as a business entity also have access to the personal data of data subjects. Each of these entities processes personal data in accordance with applicable legal regulations and maintains the obligation of confidentiality.

8.2 The data controller does not use so-called profiling or automated processing of the personal data of data subjects.

## **9. RIGHTS OF DATA SUBJECTS IN THE PROCESSING OF PERSONAL DATA**

9.1 When personal data are processed by the data controller, data subjects have the following rights:

- the right to information as to **whether the personal data of data subjects are processed by the company or not**,
- the right of access to **information on the selected purposes** of personal data processing,
- the right of access to information on the relevant **categories** of personal data being processed,
- the right to information **on the retention period** of the personal data being processed,
- the right to be **informed of the rights of data subjects**,
- the right to lodge a **complaint** with the Office for Personal Data Protection of the Slovak Republic,
- the right to information **on the sources from which personal data are obtained**,
- the right to information on whether the company carries out **profiling** of personal data,
- the right to **information and safeguards in connection with transfers** of personal data to third countries or international organisations,
- the right to receive prepared **copies** of the data being processed,
- the right to **rectification of inaccurate and incomplete** personal data,
- the right to **erasure** (the so-called right to be forgotten). This right allows data subjects to request the erasure of personal data. Each such request is assessed individually and with regard to the fulfilment of all conditions. In each individual case, the data controller assesses its compliance with the legitimate interests of the data controller,
- the right to **restriction** of the processing of personal data to the strictly necessary statutory grounds,

- the right to **data portability** in an appropriate format, provided that no legal grounds or other disproportionate obstacles prevent the data controller from doing so,
- the right to **object to** automated and individual decision-making,
- the right to **lodge a complaint or submit a request** with the Office for Personal Data Protection of the Slovak Republic, with its registered office at Hraničná 12, 820 07 Bratislava, telephone: +421/3231 3220, or via the following link: <https://dataprotection.gov.sk/uoou/>, which acts as the supervisory authority in the field of personal data protection.

Rights related to personal data protection may be exercised at the address of the data controller:

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## 10. TIME LIMIT FOR HANDLING REQUESTS AND FEES

10.1 All notices, inquiries, submissions and complaints (hereinafter referred to as "submissions") from data subjects are reviewed by the data controller free of charge. If such submissions prove to be unfounded, disproportionate, or are repeated regularly or irregularly, the data controller hereby reserves the right to charge a **fee** corresponding to the complexity of the relevant administrative action. The data controller deals with every submission from a data subject as quickly as possible and provides a response no later than **one month from the date of receipt**. In the case of more complex operations, this period may be extended to **two months**. The data controller always informs the data subject of the need to extend the period.

## 11. LEGAL REGULATIONS GOVERNING PERSONAL DATA PROTECTION

- 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),
- Charter of Fundamental Rights of the European Union,
- Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments and Supplements to Certain Acts,
- Constitution of the Slovak Republic.

This document was prepared in Bratislava on: ..... and will be regularly updated depending on changes to the relevant legislative provisions.

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