Terms of Privacy Protection

Dear clients,

these Terms of Privacy Protection provides you with detailed and understandable information about the processing of your personal data in the terms of our company pursuant to Art. 13 and 14 of the GDPR 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 (hereinafter referred to as the "GDPR"). These Terms of Privacy Protection applies to all persons concerned about whom we process personal data, including clients, employees, suppliers, contractual partners and persons located on our premises.

Who is the controller and where can you contact us?

The controller that processes your personal data is

SlovTan Contract Tannery spol. s r.o., with registered seat: Priemyselná 1, 031 01 Liptovský Mikuláš, Slovenská republika, Comp. Reg. No.: 31 592 635, e-mail: gdpr@slovtan.sk.

Why do we process personal data?

We need to process personal data in order to provide our clients with proper services, products and customer support, to comply with our legal obligations and also to protect our legitimate interests.

What are the purposes of the processing of your personal data?

Purpose of personal data processing	Legal basis
Contact data in connection with communication	Art. 6 (1) (f) GDPR
and the conclusion of contractual-obligatory	the processing of personal data is necessary for the
relations	purpose of the legitimate interests pursued by the
	controller
Contractual and pre-contractual relations	Art. 6 (1) (b) GDPR
	the processing of personal data is necessary for the
	performance of the contract
Processing of accounting documents	Art. 6 (1) (c) GDPR
	Act No. 431/2002 Coll. on Accounting, as amended, Act No. 222/2004 Coll. on Value Added Tax, as amended, Act no. 145/1995 Coll. on Administrative Charges, as amended, Act No. 40/1964 Coll., the Civil Code, as amended, Act No. 152/1994 Coll. on the Social Fund to amend Act No. 286/1992 Coll. on Income Taxes, as amended, Act no. 311/2001 Coll., the Labor Code, as amended, Act No. 55/2017 Coll. on Civil Service and on amendments to certain laws
Complaints and damage reports	Art. 6 (1) (c) GDPR Act No. 250/2007 Coll. on Consumer Protection. Act No. 40/1964 Coll., the Civil Code

Network security and security of information	the processing is necessary for the purposes of the
systems Registry administration including mail records	legitimate interests pursued by the controller Act No. 395/2002 Coll. on Archives and Registries
Processing and records of exercised rights of the data subjects	Chapter III of Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data
Litigation, exercise of legal claims (in general, not only in court) and judicial powers	Act No. 160/2015 Coll. the Code of Civil Adversarial Procedure Act No. 160/2015 Coll. the Administrative Procedure Code Art. 9 (2) (c) of Regulation (GDPR), if personal data of a special category is necessary for the exercise of legal claims and judicial powers under Art. 9 of the Regulations (GDPR)
Identification of a non-logged-in website user (cookies)	Art. 6 (1) (c) GDPR the data subject has given consent to the processing of his or her personal data for one or more specific purposes
User login to online services – web customer zone	Art. 6 (1) (b) GDPR the processing of personal data is necessary for the performance of the contract
Contact form on the website	Art. 6 (1) (f) GDPR the processing of personal data is necessary for the purpose of the legitimate interests pursued by the controller
Protection of rights and property by camera system	Art. 6 (1) (f) GDPR the processing of personal data is necessary for the purpose of the legitimate interests pursued by the controller
Keeping records of natural persons – high school students and university students who will participate in vocational training at the controller for a predetermined time	Art. 6 (1) (b) GDPR the processing of personal data is necessary for the performance of the contract Art. 6 (1) (f) GDPR the processing of personal data is necessary for the purpose of the legitimate interests pursued by the controller
Ensuring occupational health and safety – organization of initial trainings, investigation, registration and record keeping of occupational accidents	Art. 6 (1) (b) GDPR the processing of personal data is necessary for the performance of the contract Art. 6 (1) (c) GDPR Act No. 124/2006 Coll. on Occupational Safety and Health and on amendments to certain acts as amended Act No. 355/2007 Coll. on the Protection, Support and Development of Public Health and on the amendment of certain acts as amended Art. 6 (1) (f) GDPR the processing of personal data is necessary for the purpose of the legitimate interests pursued by the controller

Identification of a natural person during a one- time entry into the premises of the controller in order to ensure the protection of property, safety and health in the premises of the controller	Art. 6 (1) (f) GDPR the processing of personal data is necessary for the purpose of the legitimate interests pursued by the controller
Investigation of complaints under Act No. 54/2019 on the Protection of Whistleblowers of Anti-social Activity	Art. 6 (1) (c) GDPR Act No. 54/2019 Coll. on the Protection of Whistleblowers of Anti-social Activity
Promotion of the controller, publication of photos of organized events, activities with the intention of building a goodwill	Art. 6 (1) (c) GDPR the data subject has given consent to the processing of his or her personal data for one or more specific purposes Art. 6 (1) (f) GDPR the processing of personal data is necessary for the purpose of the legitimate interests pursued by the controller

Is there a cross-border transfer of your personal data?

There is no cross-border transfer of personal data.

Is there automated processing of personal data with legal effect and/or other significant impact on you?

In order to improve the quality of the services we provide, we process your personal data automatically. Automated processing shall mean any processing of personal data that uses automatic information systems, such as IT applications, software, etc. We currently do not perform profiling.

How long is your personal data stored?

Personal data are stored no more than for the time necessary to fulfil the purpose of processing. In general, the retention period results from legal regulations. If it does not follow from the legal regulations, the retention period for your personal data is always determined based on specific purposes through our internal regulations and our registry plan. If we process your personal data on the basis of the consent, once the consent is withdrawn, we are obliged to stop processing the personal data for the given purpose. However, this does not rule out that your personal data may continue to be processed on another legal basis, especially if it necessary to meet legal obligations. The general personal data retention periods for the purposes of personal data processing defined by us are as follows:

Purpose of personal data processing	Retention period or criteria for its determination
Contact data in connection with communication and the conclusion of contractual-obligatory relations	for 10 years
Contractual and pre-contractual relations	the term specified in the contract
Processing of accounting documents	for 10 years
Complaints and damage reports	for 10 years
Network security and security of information systems	for 1 year
Registry administration including mail records	for 10 years
Processing and records of exercised rights of the data subjects	for 5 years

Litigation, exercise of legal claims (in general, not only in court) and judicial powers	for 10 years
Identification of a non-logged-in website user (cookies)	for 5 years
User login to online services – web customer zone	during the registration period
Contact form on the website	for 5 years
Protection of rights and property by camera system	for 72 hours
Keeping records of natural persons – high school students and university students who will participate in vocational training at the controller for a predetermined time	for 10 years
Ensuring occupational health and safety – organization of initial trainings, investigation, registration and record keeping of occupational accidents	for 10 years
Identification of a natural person during a one-time entry into the premises of the controller in order to ensure the protection of property, safety and health in the premises of the controller	for 5 years
Investigation of complaints under Act No. 54/2019 on the Protection of Whistleblowers of Anti-social Activity	for 5 years
Promotion of the controller, publication of photos of organized events, activities with the intention of building a goodwill	for 10 years

How do we collect your personal data?

Where the legal basis for your personal data processing is the conclusion or fulfilment of a contractual relationship, personal data need to be provided for conclusion of the contract. Failure to provide personal data results in failure to conclude a contractual relationship. Where the legal basis for your personal data processing is our compliance with any legal obligation, your personal data need to be provided for legal purposes. Failure to provide personal data may result in failure to secure the completed task or to issue the decision you are requesting from us. Where the legal basis for your personal data processing is a legitimate interest and we use the legal basis for your personal data processing, you are obliged to tolerate this processing, but you have the right to object to it.

Where the legal basis for your personal data processing is

consent to the personal data processing, you are not obliged to provide your personal data. You are entitled to withdraw the given consent at any time. Failure to provide personal data should not have any negative and significant consequences for you, but the comfort of using some services and your information about news may be reduced.

What are your rights when processing personal data?

1. The right to request the controller to provide access to personal data relating to the data subject pursuant to Art. 15 of the Regulation:

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;

- c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- **d)** where possible, the envisaged personal data retention period, or, if this is not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, referred to in Art. 22 (1) and (4) of the Regulation and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Where personal data are transferred to any third country or international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Art. 46 of the Regulation relating to the transfer. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form. The right to obtain a copy shall have no adverse effects on the rights and freedoms of others.

2. The right to rectification of the personal data pursuant Art. 16 of the Regulation:

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

3. The right to erasure (the "right to be forgotten") pursuant to Art. 17 of the Regulation:

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws the consent on which the processing is based under Art. 6 (1) (a) or Art. 9 (2) (a) of the Regulation, and where there is no other legal ground for the processing;
- c) the data subject objects to the processing pursuant to Art. 21 (1) of the Regulation and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Art. 21 (2) of the Regulation;
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased in order to comply with a legal obligation under the Union or Member State law to which the controller is subject;
- f) the personal data have been collected in relation to the offer of information society services referred to in Art. 8 (1) of the Regulation.

Where the controller has made the personal data public and is obliged to erase the same, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

The right to erasure shall not apply to the extent that processing is necessary:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- c) for reasons of public interest in the area of public health pursuant to Art. 9 (2) (h) and (i), as well as Art. 9 (3) of the Regulation;

- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes pursuant to Art. 89 (1) of the Regulation, in so far as the above-mentioned right is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- e) for the establishment, exercise or defence of legal claims.

4. The right to restriction of processing pursuant to Art. 18 of the Regulation:

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- d) the data subject has objected to processing pursuant to Art. 21. (1) of the Regulation pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted under above-mentioned, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. A data subject who has obtained restriction of processing pursuant to above-mentioned shall be informed by the controller before the restriction of processing is lifted.

5. The right to data portability pursuant to Art. 20 of the Regulation:

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transfer those data to another controller without hindrance from the controller to which the personal data have been provided, where: the processing is based on consent under Art. 6 (1) I(a) or Art. 9 (2) (a) of the Regulation, or on the contract pursuant to Art. 6 (1) (b) of the Regulation, and (b) if the processing is carried out by automated means. In exercising his or her right to data portability, the data subject shall have the right to have the personal data transferred directly from one controller to another, where technically feasible. The exercise of the right shall be without prejudice to Art. 17. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. The right to data portability shall have no advers effect on the rights and freedoms of others.

- The right to object to processing, including objecting to profiling (if carried out) under Art. 21 of the Regulation: The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is carried out on the basis of Art. 6 (1) (e) (processing necessary to fulfil a task carried out in the public interest or in the exercise of public authority entrusted to the controller) or (f) (processing necessary for the purposes of legitimate interests pursued by the controller or a third party) of the Regulation, including objections to profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Art. 89 (1) of the Regulation, the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 7. The right to lodge a complaint with the supervisory authority:

The data subject shall have the right to lodge a complaint at the Office for the Protection of Personal Data of the Slovak Republic, with headquarters at Hraničná 12, 820 07 Bratislava, especially if the data subject considers that the processing of personal data relating to him or her infringes this Regulation.

8. The right to withdraw consent to processing:

Where the legal basis for the processing of personal data is the consent of the data subject, the data subject shall have the right to withdraw his or her consent at any time. The withdrawal of the consent shall not affect the lawfulness of processing based on consent before the withdrawal. The right to revoke the consent at any time, even before the expiration of the period for which this consent was granted, can be exercised by the data subject in the following ways:

- a) by email sent to gdpr@slovtan.sk.
- b) by sending a written request to the address of the controller's registered office with the text "GDPR withdrawal of consent" on the envelope.

How do we protect your personal data?

It is our duty to protect your personal data in an appropriate manner and for this reason we pay due attention to their protection. We have implemented generally accepted technical and organizational standards for the purpose of maintaining the security of processed personal data, especially against their loss, misuse, unauthorized modification, destruction or other impact on the rights and freedoms of the data subjects.

Cookies

Our website uses the so-called cookies in order to adapt its content and design

to your preferences. Cookies are understood as IT data, including but not limited to text files, stored by the user on the computer for the purpose of using the website. These text files make it possible to recognize the user's computer and display the website in a relevant way, adapting to the user's preferences. Cookies usually contain the name of the website from which they originate, the time of storage on the computer and the original number. Cookies are used to adapt the content of the website to the user's preferences and to optimize the use of the website. They are also used to prepare anonymous,

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The web browser uses the option to store cookies on your computer by default. These settings can be changed so that the automatic management of cookies is blocked in the web browser settings or the user is informed each time cookies are sent to his/her computer. Detailed information about options and methods of using cookies are available in the application (web browser) settings. Restricting the use of cookies may affect some functions on the website.