

PROCESSING PERSONAL DATA

This document describes the manner and purpose of processing personal data by the controller - púpava development, s.r.o., Mikovíniho 10, 917 01 Trnava, Company Identification Number: 47 346 787 (hereinafter referred to as 'púpava development, s.r.o.' or 'controller') and provides any other information required by law, including information on the rights of the data subject and how to exercise them.

Regulation (EU) 2016/679 on personal data protection (hereinafter referred to as 'Regulation') is a regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, protecting the fundamental rights and freedoms of natural persons, in particular in relation to their right to personal data protection.

Pursuant to Article 4 (1) of the Regulation, the term 'personal data' means any information relating to an identified or identifiable natural person (hereinafter referred to as 'data subject').

'Processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction (Article 4 (2) of the Regulation).

Pursuant to Article 12 et seq. of the Regulation, the data subject must be provided with the relevant information relating to the processing activities of the controller and the rights of the data subject.

1. ON WHAT BASIS CAN WE PROCESS YOUR PERSONAL DATA?

Processing shall be lawful only if and to the extent that at least one of the following applies:

- the data subject has given consent to the processing of their personal data for one or more specific purposes,
- processing is necessary for the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject prior to entering into a contract,
- processing is necessary for compliance with a legal obligation,
- processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

2. WHAT IS THE PURPOSE OF PERSONAL DATA PROCESSING, WHICH PERSONAL DATA DO WE PROCESS, HOW LONG DO WE STORE YOUR PERSONAL DATA?

As the controller, the company processes your personal data in the following manner/for the following purposes:

ACCOUNTING AND BUSINESS AGENDA

- The purpose is to comply with the controller's legal obligations arising from specific regulations (e.g. the Act on Accounting, the Act on Value Added Tax, the Act on Income Tax).
- Legal basis (including provision thereof to third parties): legal obligation
- Retention period: 10 years.

BUSINESS COMMUNICATION

- The purpose of processing is the preparation and implementation of the controller's business activities.
- Legal basis: The legitimate interest pursued by the controller entailing the right to conduct business activities within the scope of the line of business listed in the extract from the relevant register.
- Retention period: is linked to the preparation and duration of the commercial relationship as well as the expiry of the limitation period.

PERSONNEL AND WAGE MANAGEMENT AGENDA

- The purpose of processing is the preparation and conclusion of an employment contract or agreement on work outside an employment relationship, registration of documents related to work capability, wage payments, levies, compliance with obligations towards state administration authorities, attendance records, training records, records of mandates and authorizations, records of property or equipment, conclusion of material liability agreements, records of cash issuance, provision of employee benefits, records of damages caused by employees in the workplace or to the property of the controller (employer), provision of meals, copies of documents necessary for the purposes of employment or similar relationships, as well as other legal and contractual obligations.
- Legal basis: compliance with a legal obligation, performance of a contract, consent granted, or a legitimate interest
- Retention period: throughout the duration of the employment relationship or similar relationship until the employee's 70th year of age (including former employees).

REGISTRY MANAGEMENT

- The purpose of processing is the compliance with legal obligations arising from the Act no. 395/2002 Coll. On Archives and Registries and on the Amendments of Certain Acts as amended
- Legal basis: compliance with a legal obligation.
- Retention period: is determined by specific regulations.

CONSENT GIVEN BY THE DATA SUBJECT

- The controller shall process the personal data of data subjects based on their explicit consent.
- The controller shall keep the personal data processed with consent of the data subject for a maximum period of 10 years after consent has been given.
- The data subject shall have the right to withdraw their consent to the processing of personal data at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

DISTRIBUTION OF MESSAGES FOR THE PURPOSES OF DIRECT MARKETING AND ANSWERING QUERIES

- The purpose of direct marketing processing is to offer you information on the latest news and products that may be relevant and interesting to you.
- The legal basis for the processing of the personal data in this case is our legitimate interest.
- Retention period: we shall process your personal data for this purpose until you have cancelled your participation in the marketing list or opted out of receiving direct marketing messages (newsletter).

- REAL ESTATE ACTIVITY

- The processing of personal data for the purpose of advertising through internet real estate portals in real estate CRM software, i.e. listing real estate for sale, or renting to a third party. The respective real estate CRM software includes the personal data of the data subject as well as the owner of the real estate to facilitate easier identification for the controller whereby these are not visible to third parties.

- RECORDING THE RIGHTS OF DATA SUBJECTS

- The purpose of processing as well as the legal basis is to comply with the legal obligation of the Company.
- Retention period: 2 years from the date of processing the data subject's request

- COURT PROCEEDINGS

- The purpose of processing as well as the legitimate interest is to establish, exercise and defend the Company's legal claims.
- Legal basis: the controller's legitimate interest in complying with legal claims
- Retention period: until the final judgment on the matter

3. TO WHOM DOES THE COMPANY PROVIDE YOUR PERSONAL DATA?

The company provides your personal data to the following persons: Company accountant (including external accountants), state and public authorities, self-government bodies, company website administrator, auditor, lawyer, information technology management and support companies, information service providers, data storage providers and – in justified cases – courts and law enforcement authorities, health insurance company, supplementary pension savings institutions, education agencies, institutions providing occupational health service, occupational health and medical assessment, institutions providing postal service.

4. 'COOKIES' ON OUR WEBSITE

The controller uses cookies on the website www.pupava.com only with consent of the data subject. Cookies are small text files consisting of letters and numbers stored on your computer's hard disk by a web browser that are able to uniquely identify your IP address. We use cookies in order to communicate electronically by e-mail to identify users of the site.

5. DISCLOSURE OF PERSONAL DATA

The personal data shall not be disclosed.

6. AUTOMATED INDIVIDUAL DECISION-MAKING

The personal data shall not be used for automated decision-making, including profiling.

7. PERSONAL DATA TRANSFER OUTSIDE THE EU

Personal data transfer to third countries or international organizations shall not take place.

8. RIGHTS OF THE DATA SUBJECT

Right for consent withdrawal - where the processing of the personal data is based on your consent, you shall have the right to withdraw it at any time. Your consent may be withdrawn electronically, at the address of the responsible person, in writing, by the notice of consent withdrawal, or in person at the office. The withdrawal of consent shall not affect the lawfulness of processing your personal data based on consent before its withdrawal.

Right of access – you shall have the right to obtain a copy of the personal data undergoing processing, as well as the information relating to how we use your personal data. In most cases, your personal data shall be provided to you in writing, unless otherwise requested. If you have requested this information by electronic means, it shall be provided to you electronically, if technically feasible.

Right to rectification - we take all reasonable measures to ensure that the information we have at our disposal is accurate, complete and up to date. If you believe that any information we have is inaccurate, incomplete or outdated, please feel free to ask us to rectify, update or complete this information.

Right to erasure (to be forgotten) – you shall have the right to ask us to erase your personal data, for instance if the personal data we have collected are no longer necessary to fulfill the purpose for which they were processed. 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 may not be able to comply with your request.

Right to restriction of processing – under certain circumstances, you shall have the right to obtain from us restriction of processing of your personal data. For example, this applies to cases in which you believe that the personal data we have collected may be inaccurate, or if you think that we shall no longer need to use your personal data.

Right to data portability – under certain circumstances, you shall have the right to transmit your personal data that you have provided to us to a third party of your choice. However, the right to data portability applies only where you have provided the personal data based on consent or a contract to which you are one of the parties.

The right to object – you shall have the right to object to the processing of personal data based on our legal legitimate interests. Unless we demonstrate compelling legitimate grounds for the processing and you raise an objection, we shall no longer process your personal data.

The right to a judicial remedy for the breach of personal data protection – if you believe that your personal data is being processed unfairly or unlawfully, you may file a complaint with a supervisory authority (Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27, tel. no.: +421 / 2 / 3231 3214; e-mail: statny.dozor@pdp.gov.sk, <https://dataprotection.gov.sk>. If a complaint is filed electronically, it must meet the requirements pursuant to Section 19 (1) of the Act No. 71/1967 Coll. on Administrative Proceedings (administrative fee).

9. PROVIDING INFORMATION AND EXERCISING THE RIGHTS OF THE DATA SUBJECT

In order to exercise your rights, you can contact the controller at any time in the following manner:

- Address: púpava development, s.r.o., Mikovíniho 10, 917 01 Trnava.
- E-mail: info@pupava.com

We shall respond to your request free of charge within 30 days. In case of complexity, or a large number of requests, we shall be entitled to extend this period by another 60 days. Should this occur, we shall inform you of the reasons accordingly.

In the event of a repeated request, we shall be entitled to charge an appropriate administrative fee to cover the costs of providing this service.