

INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA

Proper processing and protection of your personal data is important for our company, and this document provides information about reasoning the rationale and purpose behind processing them. It also contains your rights and other information connected with the processing of your personal data.

CONTROLLER OF PERSONAL DATA

ABONEX, s.r.o., established at Markušovská cesta 1, 052 01 Spišská Nová Ves, Slovak Republic, ID: 36210315, VAT No: SK2020034918, incorporated in the Košice District Court Commercial Register, Section Sro, Insert No 12857/V, Email: abonex@abonex.sk, Tel.: +421-53-4177 701 (hereinafter "ABONEX" or "Controller").

The Controller has not named a data protection officer, as provided in current legislation. The Controller undertakes to keep secret the personal data it acquires about data subjects and considered such data to be confidential.

LEGAL FRAMEWORK

European Framework

Charter of Fundamental Rights of the European Union - Regulation (EU) of the European Parliament and of the Council 2016/679 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 (GDPR)

National Legislation

Constitution of the Slovak Republic

Act 18/2018 Coll. on protection of personal data, amending certain laws, as amended

The Controller undertakes to process personal data in accordance with Act 18/2018 Coll. on protection of personal data, as amended, ("the Act") and 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, repealing Directive 95/46/EC ("the Regulation"), which entered into effect on 25 May 2018.

PURPOSES FOR ABONEX'S PROCESSING PERSONAL DATA

Business partners

- Conclusion, registration and management of trade and transportation contracts, including customer care as an element of transactions (hereinafter "Contract").
- Handling transactions/securing transport.
- Processing personal data as part of accounting.
- Offering products and services, and providing marketing information.

The Controller is entitled for the purpose of concluding, registering and managing trade and transportation contracts to process personal data for the term of the Contract, until the ultimate settlement of all obligations provided in the Contract by and between the parties and for a period of at most 10 years thereafter. After terminating a contract, the Controller will process personal data for the purpose of recovering any outstanding amounts and/or to lodge complaints and take any other action associated therewith, although only to the extent necessary to achieve this end. Personal data may only be processed for a longer period when it is necessary either under applicable legislation or for the time required for the retention of personal data to the necessary extent. The processing of personal data for contractual, accounting or tax purposes and to meet all other legal obligations are either legal or contractual requirements. If you envisage through the forms published on our official websites to take desired action,

you are obliged to provide us with your personal data for these purposes. Unless you provide these data, we cannot handle your request.

Personal data is processed by the Controller for marketing purposes with the independent and voluntary consent of the data subject involved. Toward this end, the Controller is entitled to process the data subject's personal data for a period of 10 years, starting on the date consent is granted. For marketing purposes, the Controller is entitled to provide a data subject's personal data to third parties involved in the Controller's marketing activities, i.e. activities provided or directly conducted for the Controller, although exclusively for purposes of the Controller's marketing. The processing of personal data for marketing purposes is voluntary and not critical to the purposes of the conclusion, performance or existence of a Contract.

In most cases, your personal data is processed by us in order to meet legal requirements in special legislation and for the legitimate interests we pursue.

We have a legal obligation to provide your personal information when we are audited by authorized institutions and to prevent, monitor and provide evidence of fraud and criminal offenses. Your data will be securely stored in accordance with data protection legislation.

Jobseekers

Your data is processed by us in order to determine whether you are qualified for the position you are seeking.

Your personal data is processed because they are essential for the legitimate interests we are pursuing or, with your consent, when you request us to do it. Our legitimate interest in this case is to recruit qualified candidates for open positions.

TYPE OF PERSONAL DATA PROCESSED

Business partners

ABONEX, s.r.o. and our contracted processors are legally entitled to process the following personal data and categories of personal data:

- Identification and address data such as full name or surname, delivery or other contact addresses, address of the point of delivery, place of business, company registration number, tax number;
- Electronic contact details such as phone number and email address;
- Other electronic data: IP Address, cookies;
- Other personal data associated with contractual relationships: bank account number, order history;
- Other personal data: typical information provided to customers in order forms or other documents and in communications with us, including subsequent updates.

Marketing Purposes

Personal data is processed by the Controller for marketing purposes include full name or surname, company name, address, email address and telephone contact.

Jobseekers

When you submit your job application with us, we obtain the following data from you:

- Contact data - your full name, address, email address and phone number
- Information from your resume/CV - such as information about your previous employment, education, skills, language skills and any other information you choose to put on your CV;
- Cover letter - any information you decide to mention in your cover letter;
- Competence - information related to possible qualifications demonstrating competence for the job;

Depending on the position for which you are applying, we may additionally obtain the following information from third parties:

- Appraisal - we may ask you to undergo an assessment of your skills, personality or cognitive competence. Such assessments are usually conducted by third-party software or through a third-party company which shares its results with us. No third party is able to identify the person that fills out the appraisal. Before carrying out such an assessment, we will provide you with other information regarding your particular case;
- References - we may opt to get references from people who have worked with you in the past. These people will be contacted only after you have provided us with their names and contact data.

ACCESS TO PERSONAL DATA AND TRANSFER OF DATA TO THIRD COUNTRIES

The following categories covering our partners (beneficiaries) may receive access to your personal data:

- Goods transport providers;
- Providers of accounting, tax and personnel consultancy services and software providers in these sectors;
- IT service and hosting providers;
- Providers or security and integrity for our services and websites;
- Analytical service providers;
- Providers of legal services and attorneys;
- Providers of printing and postal services.

If the Controller mandates a third-party processor to process a data subject's personal data within the meaning of the Regulation and the Act, the Controller will be then obliged to notify the data subject thereof, unless the processor earlier does so, and to provide him or her with the necessary information specified in applicable legislation. The Controller declares that, in selecting a processor, that it has taken heed of its professional, technical, organizational and personnel's competence and of its ability to ensure protection of personal data. The Controller enters into contracts with processors to process personal data that requires them to comply with established conditions for protecting personal data. A list of processors is available at the Controller's registered office.

No personal data about data subjects is transferred to third countries or international organizations.

RETENTION OF PERSONAL DATA

Business partners

Your data is stored by us for as long as it is necessary to fulfill the purposes of processing them provided in special legislation and the purposes for which they were acquired, when we have a legitimate interest to retain them, for example until the termination of a contractual relationship and/or expiry of the limitation period in which we should be able to defend ourselves against legal claims. We are also legally obliged to retain your personal data for a defined period in order to prevent and detect fraud, combat money laundering and for financial audits.

We can process your personal data when you give us your consent thereto.

Tenderers and Jobseekers

Your personal data is stored by us only for a limited time, where they will be deleted when no longer needed for the purposes of the processing shown in this statement. Your data will be retained by us while the selection or open competition takes place and either will be deleted after an appropriate tenderer has been selected or retained with your consent when you are a candidate seeking a position.

Your personal data will not be used in automated decision-making.

COOKIES

The Controller's websites employ analytical instruments enabling the behavior of visitors to these website to be monitored as they browse and use them. Our sites use your cookies and Google Analytics in order to adapt marketing offers to your individual needs. Visitors to the Controller's website have the option to delete or reject cookies by setting their preferences for them individually in their web browsers. However, rejecting the use of cookies will cause certain features on the website to become unavailable.

RIGHTS OF DATA SUBJECTS

- Right of access to their personal data
- Right to rectify and supplement personal data
- Right to erasure of personal data
- Right to restrict processing of personal data
- Right to object to the processing of your personal data
- Right to personal data portability
- Right not to be subject to automated individual decision-making, including profiling, if the controller processes personal data through profiling or any similar method based on automated individual decisions
- Right to withdraw consent at any time to the processing of personal data, if this is the legal basis for processing
- Right to contact the Office for Personal Data Protection of the Slovak Republic and initiate proceedings

These rights for data subjects are specified in Articles 15-21 of the Regulation. Data subjects exercise these rights in accordance with the Regulation and other relevant legislation. Any data subject can exercise their rights vis-a-vis ABONEX in a written request or through electronic means. If a data subject requests oral disclosure of information, it can be disclosed, provided the data subject establishes his or her identity. The Controller does not process personal data either through profiling or any similar method based on automated individual decisions.

Right to object to the processing of personal data

A data subject has the right to object at any time to the processing of his or her personal data, on grounds relating to his or her particular situation. A data subject may object to the processing of his or her personal data based on: a) legal title to perform a task carried out in the public interest or in the exercise of an official authority, or in the legitimate interest of the Controller; b) processing of personal data for direct marketing purposes; c) processing for scientific or historical research purposes or for statistical purposes. If a data subject objects to processing for direct marketing purposes as referred to in (b) above, the personal data can be no longer processed by the Controller.

The Controller takes a reasonable amount of time to assess objections it receives. The Controller is not allowed to process personal data unless it demonstrates compelling legitimate grounds for it which either override the rights or interests of the data subject, or in order to exercise legal claims.

Where you can exercise your rights

Data subjects can write to the Controller, ABONEX, s.r.o., with their comments and requests concerning the processing of personal data at its registered office: Markušovská cesta 1, 052 01 Spišská Nová Ves, or email abonex@abonex.sk.

All information and statements about the rights you are exercising are provided by us at no charge. If the request is manifestly unfounded or excessive, in particular because it is repetitive, we are entitled to charge a reasonable fee that takes into account administrative costs associated with the provision of the desired information. When there are repeated requests for copies to be provided of processed personal data, we reserve the right for such cause to charge a reasonable free for administrative costs.

Prerequisites for withdrawing consent

Consent to the processing of personal data, where such processing is based thereon, can be withdrawn directly with the Controller.

To withdraw consent, please enter who is withdrawing consent (full name, permanent address and date of birth) sign the request to withdraw consent and indicate from whom you are withdrawing consent. Mention explicitly that you do not wish any longer for your personal data to be processed for marketing purposes or any other purposes for which we are processing your personal data at your consent. If you would like to receive only select offers, please indicate how we could accommodate you.

These principles for processing personal data enter into effect on 25 May 2018