

# **Regulation**

## **on the protection of personal data**

### **Classification**

The Personal Data Protection Regulation has confidential character. The information contained in this document may not be reproduced, copied, distributed, loaned, provided, made available or sold to third parties. It is also forbidden to modify or change this information by any other means of automated or non-automated processing without the prior written consent of the author.

This document is prepared by the author exclusively for the controller. Neither controller nor any third party is authorized to use this document or data from it for their own use or for the use of another person.

### **Identification of controller**

Business name: FADEUS s.r.o.

IČO: TIN: 54 928 176

Headquarters: Doležalova 3424/15C, 821 04 Bratislava

Rep.: Viktor Radványi, Teodor Derzsi, Zalán Pónya, Lukáš Majerčík

### **Article 1**

#### Scope of the regulation

1. This directive regulates the procedures of the controller, its employees, or other persons when dealing with personal data, the rules for obtaining, collecting, storing, using, disseminating and storing personal data in individual information systems. The Directive also regulates some obligations of the controller, its employees, or other persons when handling personal data.

2. This regulation is binding for the controller.

### **Article 2**

#### Basic terms

1. Personal data mean data relating to an identified or identifiable natural person who may be identified, directly or indirectly, particularly by reference to a general identifier, other identifier, such as name, surname, identification number, location data or online identifier, or to one or more factors or features specific to the physical, physiological, genetic, psychological, mental, economic, cultural, or social identity of that natural person.

2. Processing of personal data means processing operation or set of processing operations which is performed on personal data or on sets of personal data, whether or not by automated means, particularly for collection, recording, organisation, structuring, storage, alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment

or combination, restriction, erasure. Processing is any such operation with personal data, regardless of the means by which it is carried out.

3. The controller is the person who processes personal data and determines the purposes and means of processing. The controller can be a natural or legal person, public authority, agency or other entity. The controller distinguishes itself from other entities that process personal data (e.g. an intermediary) by determining the purposes and means of personal data processing. The controller is your company.

4. Processor means anyone who processes personal data on behalf of the controller.

5. The affected person is a natural person to whom the personal data relate, or whose personal data is processed. Affected persons are e.g. your employees, customers or persons who have given you consent to send the newsletter.

6. Filing system means any structured set of personal data which are accessible according to specific criteria for a defined purpose.

### **Article 3**

Basic objectives of the controller

1. During the processing of personal data, it aims to fulfill the following goals

- a) compliance with the basic principles of personal data processing;
- b) processing personal data on any of the legal bases;
- c) processing only necessary personal data to achieve the defined purpose processing of personal data;
- d) storage of personal data only for the necessary time;
- e) informing customers about the processing of personal data in your company;
- f) ensuring confidentiality of employees;
- g) compliance with legal conditions when entrusting the intermediary with processing personal data;
- h) adoption of adequate security measures.

### **Article 4**

Basic principles

During the processing of the controller's personal data aims to fulfill the following goals: When processing personal data, you comply with the following personal data processing principles:

- a) principle of legality

You can only process personal data in a legal, fair and transparent manner. As part of this policy, you must inform the data subject about the terms of processing personal data and then process it in accordance with this information. You can only process personal data on one of the legal bases established by the GDPR, while you are obliged to comply only with the GDPR and the Personal Data Protection Act, as well as other relevant legal regulations.

- b) principle of purpose limitation

Personal data shall be collected only for specified, explicit and legitimate purpose and not further processed in a manner that is incompatible with this purpose. It is prohibited to further process the

personal data obtained in this way for another purpose that is not compatible with the original purpose.

c) principle of data minimization

You can process only those personal data whose scope and content are related to their processing and are the object of its achievement. You may also not process personal data that is redundant, unnecessary and not necessary to achieve the specified purpose.

d) principle of correctness

You can only process correct and up-to-date personal data. If you find that personal data is not correct, you must take all available measures to correct or delete them.

e) the principle of minimization of retention

You can process personal data only for the time necessary to achieve the specified purpose. When you have finished processing for the given purpose, it is necessary to dispose of the personal data.

f) the principle of integrity and confidentiality

You are obliged to ensure the protection of personal data that you process. For this purpose, you must take appropriate technical and organizational measures, such as encryption or pseudonymisation.

g) principle of responsibility

The fact that it processes personal data in accordance with the GDPR and the Personal Data Protection Act and that you comply with all your obligations, you are obliged to document so that you know the fulfillment of individual obligations in the event of an inspection.

## **Article 5**

Rights of affected persons emphasizes respect for the rights of affected persons. Data subjects have the following rights:

a) Right to information

Every person whose personal data is processed has the right to information as stipulated by the GDPR and the Personal Data Protection Act. For this purpose, you are obliged to take appropriate measures to provide this information to the data subject. Information can be provided through websites, by email or in written form. Information must be provided in a concise, transparent, comprehensible and easily accessible form, formulated clearly and simply.

b) Right of access to data

The data subject shall have the right to obtain from you confirmation as to whether or not personal data concerning him or her are being processed. Where the controller processes such personal data, the data subject has right of access to the personal data and the following information.

c) Right to repair

Every person has the right to process only their correct and up-to-date data. If you ask for it asks, you must correct incorrect and out-of-date data.

#### d) Right to erasure

In certain cases, the person whose data you are processing has the right to have it deleted personal data. If the legal conditions are met, you are obliged to delete its data.

#### e) Right to restriction of processing

In certain cases, the person whose data you are processing has the right to restrict the processing of their personal data. During the restriction of processing, you can only store her data, you cannot process them in any other way.

#### f) Right to data portability

If you process personal data in electronic form based on the consent of the person in question, you may be asked to provide them with personal data in a form that allows transfer to another Controller.

#### g) Right to object

In certain circumstances, the person concerned has the right to object to the processing of his data.

#### h) The right to refuse profiling

The person concerned has the right to refuse to have his personal data be the subject automated decision-making, including profiling.

2. The operator makes it easier for the affected persons to exercise their rights and does not put obstacles in their way. For that created a system through which affected persons could exercise their rights.

3. The person concerned is always provided with information about the processing of his personal data and is educated about their rights. The Controller provides this information in an appropriate manner according to the circle of affected persons, for example in writing in documentary form, by e- mail or by publication on the website.

4. Affected persons can exercise their rights by email at [support@fadeus.app](mailto:support@fadeus.app) or by post at the address of the operator's headquarters.

5. The operator registers and processes each request without undue delay, but within one month at the latest. Within this period, it informs the person concerned who submitted the request, about the measures they took based on her request. If necessary, the stated period can be extended by another two months, taking into account the complexity of the application and the number of applications. The affected person shall be informed of the extension of the deadline within one month from the submission of the application together with the justification for missing the deadline. The notification

on the method of processing the application is submitted in the same way as the application was submitted, unless the person concerned requests a different method.

## Article 6

Terms of personal data processing

The Controller processes personal data in the following information systems:

- Processing of personal data for the purpose of operating the FADEUS application
- Processing of personal data for the purpose of operating the [fadeus.app](#) application
- Processing of personal data of employees
- Wages and HR
- Company management agenda

1. The operator processes personal data in these information systems on a legal basis - fulfillment of a contractual obligation, fulfillment of a legal obligation or based on the consent of the person concerned. If consent is required for the processing of personal data, the operator is obliged to ensure consent that meets the conditions set out in the applicable legislation. It is prohibited to process personal data in these cases without valid consent.

2. The operator is obliged to process only those personal data that he absolutely needs to fulfill the stated purposes.

3. The operator provides personal data to third parties only if there is a legal reason for doing so.

4. The operator can entrust the processing of personal data only to intermediaries who provide adequate guarantees for the security of personal data. He appoints the intermediary on the basis of a contract concluded in written form, which meets all the content requirements

according to GDPR and Act no. 18/2018 Coll. on the protection of personal data.

5. Employees of the operator who process personal data are obliged to comply with the directive

for employees, GDPR and Act no. 18/2018 Coll. on the protection of personal data. Furthermore, they are obliged to follow the operator's instructions. The operator will ensure that each employee is contractually bound to confidentiality.

6. The operator keeps records of processing activities for the mentioned information systems. If the legal prerequisites are met, the operator will carry out an assessment of the impact on data protection and consult the residual risks with the Office for Personal Data Protection.

7. The operator is obliged to document the compliance of personal data processing with the GDPR.

8. The operator shall regularly, once per calendar year and whenever there is a change in the conditions of personal data processing, reassess the obligations he has in connection with the processing

personal data are created and documented.

9. The operator is obliged to store personal data only for the necessary time to achieve the specified purpose and fulfill the legal

10. After the expiration of the specified period, the Controller will ensure the liquidation of personal data.

## **Article 7**

### Data security

1. The Controller is obliged to ensure the protection of personal data. For this purpose, he adopted adequate technical and organizational security measures taking into account the imminent risk, the nature of the processing, the latest knowledge and the costs of adopting these measures. The security measures taken are described in a separate document.

2. The Controller protects personal data from misuse by appropriate and available means. In doing so, it primarily stores personal data in premises, places, environments or systems to which access is limited, pre-determined and at any time controlled by a circle of persons; other persons may gain access to personal data only with the permission of the statutory body or other authorized person.

3. At least once a year, the Controller shall evaluate the procedures for uploading and processing personal data. The evaluation can be carried out according to customs, as a rule, a brief record, e.g. Minutes from the management meeting. If it is found that some procedures are outdated, unnecessary or have not proven effective, the operator will immediately make corrections.

4. The operator immediately resolves any security incident related to personal data. In the event that it is likely that the incident will result in a high risk for the rights and freedoms of natural persons, the operator always informs this person and announces what measures he has taken to remedy it. Each incident is more likely to be recorded. The operator informs the Office for the Protection of Personal Data about every serious incident.

This version of the Personal Data Protection Directive is valid from 15.2.2023.