**Overview of the Processing of Personal Data of Business Partners**

*According to Articles 13 and 14 of the 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") and Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments and Supplements to Certain Acts (hereinafter referred to as the "Personal Data Protection Act").*

# The purpose of this overview is to provide you with basic information regarding the processing of your personal data if you are our business partner.

# Identification and Contact Information

The data controller processing your personal data is CD – profil s.r.o., 1. mája 2070, 031 01 Liptovský Mikuláš, Company ID: 31 615 830, Phone: 044/285 18 22 (hereinafter referred to as the "data controller").

If you have any questions regarding the processing of your personal data, concerns, or complaints, or if you believe that we are processing your personal data unlawfully or unfairly, or if you wish to exercise any of your rights, you can contact us at any time by sending an email to: [ochranaosobnychudajov@cdprofil.sk](mailto:ochranaosobnychudajov@cdprofil.sk), or in writing to the address of the data controller.

Contact details of the data protection officer overseeing the processing of personal data: [dpo7@proenergy.sk](mailto:dpo7@proenergy.sk).

# Basic Overview of Processing Activities

We may process your personal data within the following processing activities (IS):

| **Title and Description of Processing Activity - Purpose and Legal Basis, Other Important Facts** | **Categories of Data Subjects** | **Categories of Personal Data** | **Retention Period for Personal Data** | **Category of Recipients (External)** |
| --- | --- | --- | --- | --- |
| **Surveillance System** - If you move within our monitored areas, you will be recorded on video surveillance, which aims to ensure security (including crime detection), protect life, health, property, and financial interests of the data controller, and safeguard the life, health, and property of individuals present in the monitored area. The recordings may be used to hold you accountable in case of violations of internal regulations and/or legal provisions related to threats or damage to property, life, health, safety, or financial interests. The processing is based on the legitimate interest of the data controller or a third party. | Individuals moving in the monitored area. | Personal data (ordinary - captured on video surveillance). | 7 days. | (1.5) Police, other authorized entities |
| **Access Control to the Premises -** Authorized individuals - If we have granted you regular access to our premises, we may perform checks on the legitimacy of your access, record your entry, and the entry of vehicles based on legitimate interest. | Employees, former employees, students, authorized external partners. | Personal data (ordinary - identification, including photographs). | - Access management and electronic cards - duration of employment or similar relationship, contractual relationship,  -Entry records - 1 year. | (1) Police, other authorized entities., |
| **Legal Agenda** - We may process your personal data for the purpose of demonstrating, asserting, or defending legal claims of the data controller or a third party in the context of court disputes, enforcement actions (court collection of debts), and out-of-court debt collection based on legal obligations and/or within the framework of legitimate interest. | Natural persons of the data controller and processor, authorized persons of the data controller and processor, other natural persons involved in the proceedings. | • Personal data (especially identification, contact, economic/property data, and other personal data obtained or provided during the course of court disputes, enforcement actions). The sensitivity of the data is determined by the subject of the court dispute or enforcement (e.g., data related to criminal convictions and offenses may be processed) | 10 years from the final conclusion of the court proceedings, enforcement proceedings, or out-of-court collection. | (1a,5) Courts, (1b,5) Executors, (1c,5) Authorities involved in criminal proceedings, (1d,5) Slovak Trade Inspection, (1e) other authorized entities. |
| **Accounting Documents** - We may process your personal data in connection with fulfilling the contract with you for the purpose of meeting accounting and tax obligations under specific legal regulations. | Clients/contractual partners of the data controller, taxpayers of the data controller. | • Identification, contact, financial/payment data, and other data related to the fulfillment of the contract, accounting, and tax obligations. | 10 years. | (1a) Tax authorities, (1b) Auditors, (1c) Other authorized entities. |
| **Reporting Anti-Social Activities -** We may process your personal data if you have submitted a non-anonymous report of possible anti-social activities, or if you are the subject or participant in the investigation of possible anti-social activities under specific legal regulations. | Natural persons who reported anti-social activities or requested protection when reporting serious anti-social activities (or their close persons for whom protection is requested) and natural persons who are being investigated based on the report. | • Personal data - stated in the report and data necessary for its examination (especially ordinary identification personal data about the whistleblower, individuals involved in the violation, details of the report (which may contain data of varying sensitivity). | 3 years (from the date of receipt of the report). | (1) Office for the Protection of Whistleblowers, participants in the proceedings, other relevant administrative authorities, Police of the Slovak Republic, Prosecutor's Office of the Slovak Republic, Courts of the Slovak Republic, other authorized entities |
| **Record of Business Partners** - We may process your identification and contact details if you are our business partner (or a designated contact person), and we need this data in the context of fulfilling our business relationships. The legal basis | Business partners of the data controller and employees of the business partner. | Personal data (ordinary - identification and contact details in the scope of a business card). | 1 year. | (1) Other authorized entities. |
| Technical and Organizational Measures - We may process records containing your personal data as part of the implementation of technical and organizational measures adopted by the data controller to ensure an adequate level of security, maintain compliance with the requirements of the GDPR, and prevent or eliminate adverse effects on data subjects and the data controller. This may include, for example, records of employee training, confidentiality agreements of individuals who come into contact with personal data, records of your consent to the processing of personal data, records related to handling your requests to exercise rights, records related to the resolution of security incidents and breaches of personal data protection, records from audit activities in which you participated, records of the assignment/revocation of assets, access rights, records related to the use of assigned assets, and so on. The processing is based on the legitimate interest of the data controller and is also a requirement arising from the GDPR. Records may be used to hold you accountable and as evidence for demonstrating, asserting, or defending legal claims of the data controller or a third party (especially in relation to threats/breaches of security, including the protection of human life and health, property, financial or material damage, disruption of activities, damage to reputation, leakage of know-how, etc.). | Employees, responsible persons, applicants exercising their rights, individuals to whom the data controller has obligations under the GDPR, individuals involved in or addressed in the context of a security incident, processors, other external entities (such as consultants, auditors, lawyers if they are involved in the addressed issue), employees of authorities based on specific legal regulations (e.g., employees of supervisory authorities in the context of consulting or auditing activities), and so on. | • Personal data (ordinary - identification, contact details, which may be supplemented with other necessary data of various natures depending on the nature of the issue being addressed, e.g., login data, data related to the behavior of users/offenders (e.g., login, logout, activity logs), data necessary to verify the identity of the person requesting the exercise of rights, data indicating violations of internal regulations (e.g., bypassing security settings, etc.), and so on. | According to the chapter "Record Keeping, Archiving" of the Privacy Policy and the Data Security Policy (most records are kept for 3 years or less, records related to deletion or containing contracts for 5 years, some records permanently - e.g., those related to the resolution of security incidents, impact assessments, informing data subjects, etc.). | (1a,5) Responsible person, Office for Personal Data Protection of the Slovak Republic, (1b,5) Police, Prosecutor's Office of the Slovak Republic, Courts of the Slovak Republic, (1c) Other authorized entities. |

**Obligation to Provide Personal Data**

The obligation to provide personal data varies for each of the processing activities mentioned above. In cases where processing is based on your voluntary consent, you are not obligated to provide personal data; however, by not providing it, you may be unable to utilize our service that relies on such consent or may not be able to benefit from it.

In cases where processing is a legal or contractual requirement, or a task that we are obligated to perform in the public interest, you are required to provide us with personal data. Failure to provide such data may result in a violation of the law or hinder your ability to use our services, as we will not be able to fulfill our legal/contractual obligations.

Providing personal data that we process based on legitimate interest is mandatory; however, you have the right to object to such processing. We will always properly assess your request; however, it is possible that in certain cases we may not be able to comply with your request, and the provision of personal data will remain mandatory. Similarly, when we conduct profiling, you have the right to request that you not be subject to it.

No transfer of personal data to third countries or international organizations takes place.

Profiling is not conducted.

**Supplementary Information**

# Data from some of the processing activities mentioned above may, where applicable and to the necessary extent, be used in the context of demonstrating, asserting, or defending our legal claims or the legal claims of a third party (for example, providing data to law enforcement authorities, executors, lawyers, etc.), in court or out-of-court proceedings, debt collection, and so on. Some personal data obtained (e.g., confirmations, records, other documents confirming a given fact, etc.) may be retained and used as "evidence" for audit purposes, control activities by third parties, in verifying the proper fulfillment of the data controller's obligations under legislative requirements, or other requirements (contractual, sectoral, etc.).

# Your Rights

As a data subject whose personal data we process, you have rights under the GDPR and the Personal Data Protection Act in relation to the processing of personal data, including the right to request access to personal data processed about you, the right to rectification (or supplementation) of personal data, the right to erasure, or restriction of processing of personal data, the right to object to the processing of personal data, the right not to be subject to automated individual decision-making, including profiling, the right to data portability, and the right to withdraw consent to the processing of personal data. If you decide to exercise any of your rights, you may use our request form, which is available upon request. If you are not satisfied with our response or believe that we have violated your rights or are processing your personal data unfairly or unlawfully, you have the option to file a complaint with the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic.