# Overview of the Processing of Personal Data of Students in Professional Practice

*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 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 personal data of students who are undertaking professional practice with us as the data controller.

# 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").

In case of any ambiguities, questions regarding the processing of your personal data, suggestions, or complaints, if you believe that we are processing your personal data unlawfully or unfairly, or in case of exercising any of your rights, you can contact us at any time by sending an email to: ochranaosobnychudajov@cdprofil.sk, or in writing to the address of the data controller.

Contact details of the data protection officer responsible for overseeing the processing of personal data: dpo7@proenergy.sk.

# Basic Overview of Processing Activities

We may process the personal data of students 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)** |
| --- | --- | --- | --- | --- |
| **Professional Practice** - We process the personal data of students (and their legal representatives) who undertake professional practice with us in fulfillment of contractual and legal obligations. | Students and their legal representatives. | Personal data (ordinary - identification and contact details, data related to behavior (e.g., data regarding the student's education, rule violations), financial data (e.g., financial support for the student), data related to ensuring safety and health protection. | 3 years. | (1.4) School, (1) Other authorized entity. |
| **Surveillance System** - If you move within our monitored areas, you will be recorded on video surveillance, which aims to ensure safety (including crime detection), protect life, health, property, and financial interests of the data controller, and protect 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 endangering or damaging property, life, health, safety, or financial interests. The processing is based on the legitimate interest of the data controller or a third party. | Individuals present in the monitored area. | Personal data (ordinary - captured on video surveillance). | 7 days. | (1.5) Police force, other authorized entity. |
| **Reporting Anti-Social Activity -** We may process your personal data if you have submitted a non-anonymous report of possible anti-social activity, or if you are the subject or participant in the investigation of possible anti-social activity under specific legal regulations. | Individuals who have reported anti-social activity or requested protection when reporting serious anti-social activity (or their close relatives requesting protection) and individuals who are being investigated based on the report. | Personal data - included in the report and data necessary for its review (especially ordinary identification personal data of 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 of Anti-Social Activity, participants in the proceedings, other relevant administrative bodies, Police Force of the Slovak Republic, Prosecutor's Office of the Slovak Republic, courts of the Slovak Republic, other authorized entities. |
| **Promotion** - We may process your photographs, video recordings, and other information about you only to the extent and in the manner for which you have given consent to the processing of personal data. If we have assessed that consent is not necessary (excessive, requiring disproportionate effort, etc.) for the given purpose, for example, if you have participated or will participate in events organized by the data controller for a wide audience, we may take and process photographs or other recordings based on our legitimate interest. The data obtained may be used for positive promotion, documentation, and presentation purposes of the activities of the data controller. It is in our interest to document the activities of the data controller and to present/promote them in building good internal relationships as well as external relationships towards the data controller and to maintain our good reputation. If you do not want your photographs, video recordings, or other related data to be used for documentation, presentation/promotion purposes, you can exercise your rights (object to processing or withdraw consent) through the contacts provided at the beginning of this information**.** | Employees (including individuals in similar employment relationships), students, other individuals. | Personal data (ordinary - especially identification data captured in photographs, video/audio recordings, and other data related to personal expressions). | Duration of the employment relationship or after the purpose has been fulfilled (5 years), does not apply to documents/records with permanent documentary value under the Archives and Records Act. | (1) Other authorized entity. |
| **Catering** - We may process your personal data if you choose to use catering services, as required by the fulfillment of an employment contract or other agreements. | Employees (including individuals in similar employment relationships, agency employees), students in professional practice/dual education, external individuals. | Personal data (ordinary related to the provision of meals - identification, financial, meal selection). | 5 years. | (1) Other authorized entity. |
| **Technical and Organizational Measures** - We may process records containing your personal data as part of the technical and organizational measures implemented 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 resolving security incidents and data breaches, records from audits and inspections in which you participated, records of the assignment/revocation of assets, access rights, records related to the use of assigned assets, etc. The processing is in the legitimate interest of the data controller and is also a duty 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 connection with threats/breaches of security, including the protection of human life and health, property, financial or material damage, disruption of operations, damage to reputation, leakage of know-how, etc.). | Employees, data protection officer, applicants exercising rights, individuals to whom the data controller has obligations under the GDPR, individuals involved in or addressed in a security incident, processors, other external entities (e.g., if individuals are invited to address the issue - consultants, auditors, lawyers), employees of authorities based on specific legal regulations (e.g., employees of supervisory authorities in the context of consulting or inspection activities), etc. | Personal data (ordinary - identification, contact data, which may be supplemented by other necessary data of various natures depending on the issue addressed - e.g., login data, data related to the behavior of the user/offender (e.g., login/logout logs, activities), 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.). | According to the chapter "Record Keeping, Archiving" of the Privacy Policy and 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., related to resolving security incidents, impact assessments, informing data subjects, etc.). | (1a,5) Data protection officer, 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 |

**Obligation to Provide Personal Data**

The obligation to provide personal data varies for each of the processing operations mentioned above.

In cases where processing is based on your voluntary consent, you are not obliged to provide personal data; however, by not providing them, for example, you may not be able to use our service that relies on consent or benefit from it.

In cases where processing is a legal or contractual requirement, or a task we are obliged 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, but it is possible that in certain cases we may not be able to comply with your request, and providing personal data will remain mandatory. Similarly, when we carry out profiling, you have the right to request that you not be subject to it.

There is no transfer of personal data to a third country/international organization.

Profiling is not conducted.

**Supplementary Information**

Data from some of the above processing operations 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, bailiffs, lawyers, etc.), in judicial or extrajudicial proceedings, debt collection, etc. Some obtained personal data (e.g., confirmations, records, other documents confirming a given fact, etc.) may be stored and used as "evidence" for the purposes of audits, inspections by third parties, verifying the proper fulfillment of the data controller's obligations under legislative requirements or other requirements (contractual, sectoral, etc.).

# Your Rights

As a student whose personal data we process, you have rights under the GDPR and the Personal Data Protection Act regarding the processing of personal data, including the right to request access to personal data processed about you, the right to rectification (or completion) 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 can 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 personal data unfairly, unlawfully, etc., you have the option to file a complaint – a proposal to initiate proceedings with the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic.