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(hereinafter also the "Personal Data Protection Principles")

pursuant to Article 13 of 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 the "Regulation") in accordance with
Section 19 of Act No. 18/2018 Coll. on the Protection of Personal Data (hereinafter the "Act").

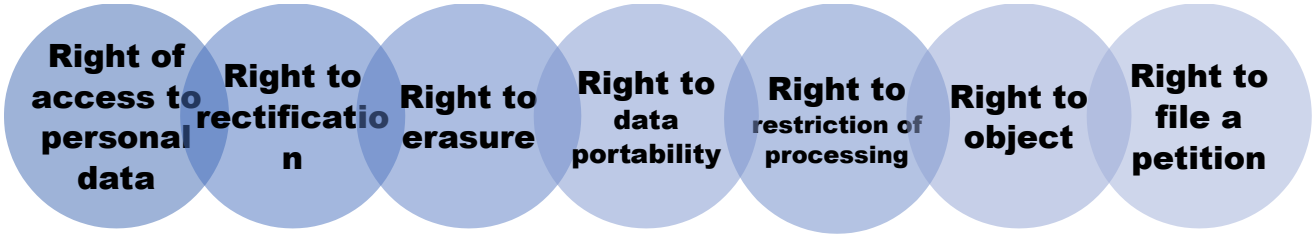
CONTROLLER:

Business name: HACO, a.s.
Registered office: 1.mája 1850, 031 80 Liptovský Mikuláš
Company ID (IČO): 34114661
registered in the Commercial Register of the District Court Žilina, Section: Sa, Insert No. 10794/L

Controller's contact details: *Contact person: Miroslava Piačeková*

0905 360 433 *Miroslava.piacekova@lsphaco.com* *1. Mája 1850, 031 80 Liptovský Mikuláš*

Rights of data subjects:



A data subject is a natural person whose personal data we process, in particular, but not limited to, employees and clients. Data subjects whose personal data are processed in our information systems for specifically defined purposes have rights which they may exercise in writing or electronically with the controller's contact person. YOU are the data subject.

Right of access to personal data

*i.e. the right to **obtain** from the competent person **confirmation as to whether or not personal data concerning the data subject** who has exercised this right are being processed, as well as **the right to access such data.** As a data subject, you are entitled to access information on: the purposes of the processing, the categories of personal data concerned, the recipients, the period of processing and storage, the logic involved in any automated processing and, where applicable, the consequences of such processing, etc. (Article 15 of the Regulation). As the controller, we have the right to use all reasonable measures to verify the identity of a data subject who requests access to data, in particular in the context of online services and online identifiers. At the request of the data subject, the controller shall issue a confirmation as to whether or not personal data concerning the data subject are being processed. Where the controller processes such data, it shall, upon request, provide a copy of the data subject's personal data. The first copy is provided free of charge. For any further copies requested by the data subject, the controller shall charge a fee corresponding to the administrative costs incurred in providing the copy. Where the data subject makes the request by electronic means, the information shall be provided in a commonly used electronic form, namely by e-mail, unless otherwise requested by the data subject.*

Right to restriction of processing

may be exercised if you, as a data subject, contest the accuracy of the personal data and other requirements within the meaning of Article 18 and Recital 67 of the Regulation, by means of temporarily moving the selected personal data to another processing system, making the selected personal data unavailable to users, or temporarily suspending the processing.

Right to rectification

*where the controller holds inaccurate personal data concerning the data subject. The data subject also has the right to have incomplete personal data **completed**. The controller shall rectify or complete the personal*

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data without undue delay after being requested to do so by the data subject.

Right to erasure

("right to be forgotten") of personal data concerning the data subject. However, given its nature and significance, this right of the data subject is limited by further conditions, i.e. the controller shall erase personal data without undue delay after the data subject exercises this right where one of the following grounds applies: a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; b) the data subject withdraws the consent on which the processing is based; c) the data subject objects to the processing of personal data; d) the personal data have been unlawfully processed; e) the personal data have to be erased for compliance with an obligation under an act, a special regulation or an international treaty by which the Slovak Republic is bound; or f) the personal data have been collected in relation to the offer of information society services to a person under 16 years of age.

*The data subject **shall not have the right to erasure** of personal data where the processing is necessary: a) for exercising the right of freedom of expression and information; b) for compliance with an obligation under an act, a special regulation or an international treaty by which the Slovak Republic is bound, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; c) for reasons of public interest in the area of public health; d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or e) for the establishment, exercise or defence of legal claims.*

The controller shall erase the personal data of data subjects upon request, without undue delay after it has assessed that the data subject's request is justified.

Right to file a petition to initiate proceedings

The data subject has the right to file a petition to initiate proceedings with the Office for Personal Data Protection of the Slovak Republic if they believe that their rights in the area of personal data protection have been infringed.

Right to object

The data subject has the right to object at any time, on grounds relating to their particular situation, to the processing of their personal data. They may object to the processing of their personal data based on a) the legal basis of the performance of a task carried out in the public interest or in the exercise of official authority, or the legal basis of the legitimate interest of the controller; b) the processing of personal data for direct marketing purposes; c) processing for scientific or historical research purposes or statistical purposes. We will assess the objection received within a reasonable time. In such a case, we may no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override the rights or interests of the data subject, or grounds for the establishment, exercise or defence of legal claims.

Right to data portability

as a data subject, you have the right to have the personal data you have provided to the controller transmitted to another controller in a commonly used and machine-readable format, provided that the personal data were obtained on the basis of the data subject's consent or on the basis of a contract and the processing is carried out by automated means.

Further information:

- **The purpose of the processing of personal data** is the reason for which the controller processes the personal data of data subjects in its information systems on specifically defined legal bases. Each processing of personal data is based on a specific legal basis and carried out for a specified, legitimate and explicitly stated purpose.
- In order to ensure maximum protection of your personal data, we, as the Controller, have adopted appropriate personnel, organisational and technical measures. Our aim is to prevent, or reduce to the greatest extent possible, the risk of leakage, misuse, disclosure or other use of your personal data. **Should an event occur that is likely to result in a high risk to the rights and freedoms of natural persons, you, as the data subject, will be contacted without undue delay (Article 34 of the Regulation).**
- In order to uphold the principles of personal data processing laid down by the Regulation and the Act, in particular the principle of data minimisation, **we request from you, as the data subject, only such personal data as are a necessary statutory or contractual requirement for fulfilling the purpose of their processing. Please note that failure to provide this mandatory data necessary for entering into a contract may result in the contractual relationship not being concluded.**

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Purposes of processing, legal basis, categories of recipients, storage period, information on cross-border transfer, categories of data subjects and information on automated decision-making, including profiling, broken down by individual information systems:

ECONOMIC AND ACCOUNTING AGENDA

Purpose of the processing of personal	*The purpose of the processing of personal data is the processing of orders, incoming invoices and invoicing to customers, dealings with the bank, cash desk management, handling cash receipts and expenditures, warehouse management, records of fixed assets (including automatic depreciation) and low-value assets, and keeping the organisation's single-entry/double-entry accounts.*	
Legal basis	*Act No. 431/2002 Coll. on Accounting, as amended,* *Act No. 222/2004 Coll. on Value Added Tax, as amended,* *Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments to Certain Acts,* *Act No. 145/1995 Coll. on Administrative Fees, as amended,* *Act No. 40/1964 Coll., the Civil Code, as amended,* *Act No. 152/1994 Coll. on the Social Fund and on the Amendment to Act No. 286/1992 Coll. on Income Taxes, as amended,* *Act No. 311/2001 Coll., the Labour Code, as amended,* *Act No. 55/2017 Coll. on Civil Service and on Amendments to Certain Acts, as amended,* *Act No. 513/1991 Coll., the Commercial Code, as amended,* *Act No. 583/2004 Coll. on Budgetary Rules of Territorial Self-Government and on Amendments to Certain Acts.*	
Categories of recipients	*Competent tax offices, the Financial Directorate and other public authorities pursuant to the relevant legislation,* *processor for accounting,* *auditor, attorney* *authorised employees* *Parent company*	
Time limits for erasure of personal data *(the stated time limits are in accordance with the records management rules)*	*Auditor's reports, annual reports, financial plans*	10 years
	Invoices	10 years
	Internal documents	10 years
	Cash desk	10 years
	Debt recovery	5 years
	Bank statements	10 years
	Annual statistics	10 years
	Statistics - monthly and quarterly	5 years
	Financial statements	10 years

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Categories of data subjects	*natural persons – employees of the controller,* *suppliers and customers – natural persons, self-employed persons* *employees of suppliers and customers,* *representatives of suppliers and customers*	
Information on the existence of automated decision-making, including profiling ***- Not carried out***		
Cross-border transfer of personal data ***- Not carried out***		

LEGAL RELATIONS

Purpose of the processing of personal data	*The purpose of the processing of personal data within this agenda is* ***to ensure the management of legal affairs*** *(e.g. first-instance proceedings, handling of appeals, handling of court disputes, representation in legal matters, enforcement of decisions on compensation for damage, recovery of damages, enforcement of contractual obligations, proposing measures with organisational and legal impact, etc.).* *The purpose of the processing of personal data within this agenda is also* ***to secure the controller's claims arising from debtors' unpaid liabilities, i.e. recovery of receivables from debtors.*** *This agenda includes the processing of personal data for the purpose of satisfying the creditor (i.e. the controller) in full, from sending reminders and demands for payment, filing a petition with the competent court of the Slovak Republic or an arbitration court, enforcing a final decision by filing an enforcement petition with a bailiff, lodging a claim in bankruptcy or restructuring proceedings, and other steps related to asserting the claim for payment of the amount owed.*
Legal basis	*Act No. 460/1992 Coll., the Constitution of the Slovak Republic , as amended,* *Act No. 40/1964 Coll., the Civil Code, as amended,* *Act No. 160/2015 Coll., the Code of Civil Contentious Procedure, as amended,* *Act No. 161/2015 Coll., the Code of Civil Non-Contentious Procedure, as amended,* *Act No. 162/2015 Coll., the Code of Administrative Judicial Procedure, as amended,* *Act No. 300/2005 Coll., the Criminal Code,* *Act No. 301/2005 Coll., the Code of Criminal Procedure,* *Act No. 71/1967 Coll., the Administrative Procedure Code,* *Act No. 233/1995 Coll. on Court Bailiffs and Enforcement Activities (the Enforcement Code) and on Amendments to Certain Acts, as amended,* *Act No. 7/2005 Coll. on Bankruptcy and Restructuring and on Amendments to Certain Acts, as amended,* *Act No. 153/2001 Coll. on the Public Prosecutor's Office, as amended,*

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	Act No. 372/1990 Coll. on Minor Offences, as amended, *Act No. 586/2003 Coll. on the Legal Profession and on the Amendment to Act No. 455/1991 Coll. on Trade Licensing (the Trade Licensing Act), as amended,* *Act on the Protection of Personal Data and related legislation, as amended*
Categories of recipients	– *judicial authorities* – *bailiffs' offices* – *state administration, public authority and public administration bodies pursuant to the relevant legislation,* – *attorney, auditor* – *the debtor and their legal representative* – *intervener and other persons participating in the proceedings* – *authorised employees*
Time limits for erasure of personal data	*3 to 5 years from the termination of the contractual relationship*
Categories of data subjects	– *employees of the controller of the IS,* – *debtors,* – *opposing parties in disputes,* – *other natural persons acting as parties to the proceedings.*
Information on the existence of automated decision-making, including profiling **- *Not carried out***	
Cross-border transfer of personal data **- *Not carried out***	

RECORDS MANAGEMENT

Purpose of the processing of personal data	*The purpose of the processing of personal data within this agenda is records management, consisting of the proper registration of records (keeping complete and accurate records in the registry journal, maintaining registers and indexes of records), the proper disposal of files (records), ensuring the scheduled disposal of files (records) which are no longer needed for further activities and whose retention periods have expired, and the recording of incoming and outgoing mail.*	
Legal basis	*Act No. 395/2002 Coll. on Archives and Registries,* *Act No. 305/2013 Coll. on the Electronic Exercise of the Competences of Public Authorities and on Amendments to Certain Acts (the e-Government Act)*	
Categories of recipients	*public authorities pursuant to the relevant legislation,* *auditor, attorney* *authorised employees*	
Time limits for erasure of personal data	*Correspondence - not included in other items*	*5 years*
	Registry	*10 years*
Categories of data subjects	*data subjects within all purposes of personal data processing defined by the controller*	
Information on the existence of automated decision-making, including profiling **- *Not carried out***		

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Cross-border transfer of personal data - ***Not carried out***

EXERCISE OF DATA SUBJECTS' RIGHTS

Purpose of the processing of personal data	*The purpose of the processing of personal data within this agenda is to handle requests of natural persons seeking to exercise their rights as data subjects under 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.*
Legal basis	*Articles 15 to 22 and 34 of 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*
Categories of recipients	*state administration, public authority and public administration bodies pursuant to the relevant legislation,* *auditor, attorney* *authorised employees*
Time limits for erasure of personal data	*1 year from the date the request was handled*
Categories of data subjects	*a natural person who, as a data subject within the purposes defined by the controller, contacts* *the controller with a request to exercise their rights*

Information on the existence of automated decision-making, including profiling - ***Not carried out***

Cross-border transfer of personal data - ***Not carried out***

RECORDS OF VISITORS TO THE PREMISES

Purpose of the processing of personal data	*Personal data are processed for the purpose of recording the entry of a natural person upon a one-off entry into the building, i.e. the controller's premises .*
Legal basis	*Legitimate interest of the controller within the meaning of Article 6(1)(f) of the Regulation. The main interest of the controller is security on the premises and keeping records of external persons present on the premises.*
Categories of recipients	*processor: external security service* *authorised employees - gatekeeper*
Time limits for erasure of personal data	*15 working days from the end of the month in which the entry of the natural person was obtained and recorded*
Categories of data subjects	*Visitor – natural persons upon a one-off entry, in particular business partners and their representatives, job applicants, etc.*

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Information on the existence of automated decision-making, including profiling ***- Not carried out***
Cross-border transfer of personal data ***- Not carried out***

CONTRACTUAL RELATIONS – LEASING OF PREMISES

Purpose of the processing of personal data	*This information system processes the personal data of natural persons, i.e. clients, as well as entrepreneurs, when concluding a lease agreement with the controller and performing its subject. The controller also processes the personal data of a prospective tenant in pre-contractual relations.*	
Legal basis	*Contractual relationship between the controller and the customer established by a contract within the controller's scope of business, permitted by the Constitution of the Slovak Republic, the Civil Code, the Commercial Code,* *Act No. 455/1991 Coll. on Trade Licensing (the Trade Licensing Act) and related legislation. /Article 6(1)(b)/ The processing of the personal data of the natural person (customer) is necessary for the performance of the subject of the contractual relationship to which the data subject (customer) is a party*	
Categories of recipients	*state administration, public authority and public administration bodies pursuant to the relevant legislation,* *auditor, attorney* *authorised employees*	
Time limits for erasure of personal data	*Client records (invoices, orders, complaints)*	*5 - 10 years*
Categories of data subjects	*natural persons – tenant* *natural persons – entrepreneur* *subtenant*	
Information on the existence of automated decision-making, including profiling ***- Not carried out***		
Cross-border transfer of personal data ***- Not carried out***		

CCTV SYSTEM MONITORING PUBLICLY ACCESSIBLE AREAS

Purpose of the processing of personal data	*The purpose of the processing of personal data within this agenda is the monitoring of publicly accessible areas for the protection of property and health.*
Legal basis	*Legitimate interest within the meaning of Article 6(1)(f) of the Regulation. The main legitimate interest is the protection of the property and safety of the controller and of data subjects*
Categories of recipients	*Public authorities pursuant to the relevant legislation,* *Insurance companies*

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	Police Force *auditor, attorney* *authorised employees*
Time limits for erasure of personal data	*15 days after the day on which the recording was made*
Categories of data subjects	*natural persons who have entered the controller's publicly accessible premises* *the general public*
Information on the existence of automated decision-making, including profiling – ***Not carried out***	
Cross-border transfer of personal data – ***Not carried out***	

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If you would like further information on the processing of personal data, or wish to submit a request or exercise your rights as a data subject, please contact the contact person.