

# Fpt Slovakia, s.r.o. - Notification obligations

The company **Fpt Slovakia s.r.o.** with its registered office at Južná trieda 6, 040 01 Košice, Slovak republic, ID number 35 883 375, entered in the Commercial Register of the District Court of Košice I, section Sro, file no. 16040 / V (hereinafter referred to as the "**Company**") as a controller hereby in accordance with its information obligation under Articles 13 and 14 of 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 (General Data Protection Regulation) (hereinafter "**the EU Regulation**"), and Act no. 18/2018 Coll. on Personal Data Protection and on amendments to certain acts (hereinafter referred to as the "**Act**") provides the data subjects with the following information on the processing of personal data of data subjects by the controller. The data subject means an identified or identifiable natural person whose personal data are processed.

The company, through the **policy** of the Integrated Management System, accepted among other things, the company's commitment to maintaining a high level of information security, including the protection of personal data. The company has implemented and maintains an **information security management system** in accordance with the requirements of the ISO / IEC 27001: 2013 standard as part of the Integrated Management System. The company regularly performs an information security **audit** in the form of internal or external audits. The company has an ISO / IEC 27001: 2013 **certificate** for the information security management system issued by the certification body SNR Certification SK & CZ s.r.o.

## 1. Identification and contact details of the company

Business name:	<b>Fpt Slovakia s.r.o.</b>
Headquarters:	Južná trieda 6 040 01 Košice Slovak republic
ID number:	35 883 375
Entry in the Commercial Register:	County court Košice I, odd.: Sro, vl. č.: 16040/V
E-mail address:	svk.contact@fpt.sk
Address for correspondence:	<b>Fpt Slovakia s.r.o.</b> Južná trieda 6 040 01 Košice Slovak republic
Telephone contact:	+421 55 610 16 00
Contact email of the person responsible for data protection supervision:	OsobneUdaje@fpt.sk

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## 2. Purposes and legal bases of personal data processing

Your personal data will be processed on the basis of special legal regulations and purposes, which are determined by the controller:

Purpose of processing	Legal basis of processing activities	Categories of persons concerned	Category beneficiaries	Deadline for deletion of the personal data
selection of applicants for a job	Act No. 18/2018 Coll. §13 section 1, letter b)	applicants for a job	processor LMC s.r.o.	selected up to the age of 70 or 50 years after termination of employment;
archiving of unselected applicants for a job	Act No. 18/2018 Coll. §13 section 1, letter a)	applicants for a job	processor LMC s.r.o.	1 year
conclusion of employment	Act No. 311/2001 Coll. Labour Code	employees, spouses of employees, dependent children of employees	processor Accace s.r.o., FPT SOFTWARE COMPANY LIMITED	for the duration of the employment relationship; then up to 70 years of age or 50 years after termination of employment
registering and unregistering employees to health insurance companies	Act No. 580/2004 Coll. on health insurance on the amendment of act 95/2002 Coll. on insurance	employees	Health insurance companies	
registering and unregistering employees to the social insurance agency	Act No. 461/2003 Coll. on social insurance as amended, Act No. 43/2004 Coll. on old-age pension savings, as amended, act 650/2004 Coll. on supplementary pension savings	employees	Social insurance company	
registering and unregistering employees to pension management companies	Act No. 650/2004 Coll. on supplementary pension savings and on amendments to certain acts, as amended	employees	Pension management companies	
calculation of the employee's salary	Act No. 311/2001 Coll. Labour Code as amended	employees, spouses of employees, dependent children of employees	employees	
settlement of advances on tax on dependent activity	Act No. 595/2003 Coll. on income tax, as amended	employees, spouses of employees, dependent children of employees	Financial Administration	
contributions to pension management companies	Act No. 650/2004 Coll. on supplementary pension savings and on amendments to certain acts, as amended	employees	Pension management companies	
contributions to the social insurance agency	Act No. 461/2003 Coll. on social insurance as amended, Act No. 43/2004 Coll. on old-age pension savings, as amended, Act No. 650/2004 Coll. on supplementary pension savings and on amendments to certain acts, as amended	employees, spouses of employees, dependent children of employees, parents of dependent children of employees, close persons	Social insurance agency	10 years
contributions to the health insurance company	Act No. 580/2004 Coll. on health insurance on the amendment of act 95/2002 Coll. n insurance and on amendments to certain acts, as amended	employees, spouses of employees, dependent children of employees, parents of dependent children of employees, close persons	Health insurance companies	10 years
records of anti-social activity notifications	Act No. 307/2014 Coll. on certain measures related to the notification of anti-social activities and on the amendment of certain laws	employees	law enforcement authorities	2 years
records of access to information systems	Act No. 18/2018 Coll. §13 section 1, letter f)	employees	IT administrator of the controller	for the duration of the employment relationship
records of one-time access to the controller's premises	Act No. 18/2018 Coll. §13 section 1, letter f)	controller's visits	processor of guard service performance	2 years
records of received mail	Act No. 18/2018 Coll. §13 section 1, letter f)	senders and recipients of correspondence	authorized employee of the controller	2 years

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<i>monitoring of the controller's premises, parking lots, yard, ramps, sidewalks</i>	<i>Act No. 18/2018 Coll. §13 section 1, letter f)</i>	<i>natural bodies occurring in the monitored area</i>	<i>processor of guard service performance</i>	<i>15 days</i>
<i>ensuring legal requirements during the business trip of Fpt Company Limited employees in Company</i>	<i>Act No. 18/2018 Coll. §13 section 1, letter f)</i>	<i>natural bodies who are employees of Fpt Company Limited and plan to realize or are or have been on a business trip</i>	<i>Foreign police</i>	<i>2 years</i>
<i>payroll personal data archiving</i>	<i>Act No. 395/2002 Coll. on accounting as amended</i>	<i>employees, spouses of employees, dependent children of employees</i>	<i>Social insurance agency, Health insurance companies, Financial administration</i>	<i>selected up to the age of 70 or 50 years after termination of employment;</i>
<i>archiving of personal data in accounting</i>	<i>Act No. 431/2002 Coll. on accounting as amended</i>	<i>employees</i>	<i>Financial administration</i>	<i>10 years</i>
<i>archiving of personal e-mail address and private number</i>	<i>Act No. 18/2018 Coll. §13 section 1, letter a)</i>	<i>former employees of the controller</i>	<i>authorized employees of the controller's HR department</i>	<i>5 years</i>
<i>promotion of the controller and the Fpt group</i>	<i>Act No. 18/2018 Coll. §13 section 1, letter a)</i>	<i>employees</i>	<i>controller's website visitors</i>	<i>with the consent of the person concerned</i>
<i>identification of employees at the entrance and on the company's premises</i>	<i>Act No. 18/2018 Coll. §13 section 1, letter f)</i>	<i>employees</i>	<i>SBS processor at entry</i>	<i>10 years</i>
<i>evidence of tasks, work on projects</i>	<i>Act No. 18/2018 Coll. §13 section 1, letter f)</i>	<i>employees</i>	<i>IS JIRA processor</i>	<i>10 years</i>
<i>payroll reporting</i>	<i>Act No. 18/2018 Coll. §13 section 1, letter f)</i>	<i>employees</i>	<i>FPT SOFTWARE COMPANY LIMITED</i>	<i>10 years</i>
<i>processing of cookies of the company's website</i>	<i>Act No. 452/2021 Coll. on electronic communications, § 109 section 8</i>	<i>companies website web visitors</i>	<i>Google analytics</i>	<i>Max 365 days, depending on the type of cookies</i>

### 3. Provision of personal data

We make your personal data available only to the extent necessary and always maintain the confidentiality of the data recipient in accordance with paragraph 79 of the Act. Depending on the purpose of processing and specific circumstances, among the typical recipients of your personal data belong:

- state administration and public authorities;
- insurance companies;
- law enforcement authorities;
- security service;
- Foreign police;
- providers of standard software, cloud or hosting services (e.g. Microsoft 365, Atlassian, etc.) or our company's technical support;
- providers of analytics tools (e.g. Google);
- employees and bodies of our company;

### 4. Personal data transferred to third countries or international organizations

The transfer of personal data to third countries or international organizations does not take place. Anonymized statistics are provided for Vietnam, FPT SOFTWARE COMPANY LIMITED.

## 5. Profiling

The company **does not perform** automated profiling - such processing operations on the basis of which a decision would be made with legal effect or other significant impact on your person, which would be based solely on fully automated processing of your personal data.

## 6. Cookies

Cookies are small text files that improve the use of the website, e.g., by making it possible to identify previous visitors when logging in to the user environment, by remembering the visitor's choice when opening a new window, measuring website traffic or how it is used to improve its user experience. Our website uses cookies mainly for the purposes of basic / general traffic measurement. In addition, these technologies help us better understand user behaviour. Although the information collected through cookies and other similar technologies, typically of an impersonal nature, to the extent that Internet Protocol (IP) addresses and similar identifiers are considered personal data by law, we treat these identifiers as personal data.

### 6.1. What cookies do we use and why?

- **Necessary (technical) cookies**

Some cookies are needed to provide basic functions. The website would not work properly without it. They are enabled by default and cannot be deactivated or deleted.

- **Analytical cookies**


Analytical cookies help us improve our website by collecting and reporting information about its use. This data is used primarily to optimize the functionality of our website.

These cookies contain information about how you work with our website - as an anonymous user (the data collected **does not personally identify you**).

- **Marketing cookies**

Marketing cookies are used to track visitors across the website so that publishers can display relevant and engaging advertising.

We use cookies to customize content and advertising, provide social media functions, and analyse traffic. We also provide information on how you use our website to our social media, advertising and analytics partners. These partners may combine the relevant information with other information you have provided or obtained from you when you have used their services.

**The detailed description of the cookies we process is given on our website in the cookie statement by clicking on the icon  in the lower left corner of the screen.**

## 7. Security of your personal data

The protection of personal data in our company is not a novelty related to the acceptance of current legislative standards. Our company has been fulfilling its obligations and commitments regarding personal data protection for a long time. We have implemented and use an information security management system certified according to ISO / IEC 27001: 2013, which includes appropriate technical, personnel and organizational measures to protect personal data from accidental or unlawful destruction, accidental loss or change, unauthorized disclosure, access, storage or transmission and against all other forms of unlawful processing, including the inappropriate collection or further processing of personal data. These measures ensure a sufficient level of protection of personal data in accordance with the principles of the EU Regulation.

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## 8. Data subject rights

The EU regulation sets out the general conditions of your individual rights. However, their existence does not automatically mean that when applying individual rights, they will be satisfied by us, as in a specific case, exceptions or some rights are linked to specific conditions, which may not be met in every case. We will always consider and examine your request for a specific legislation and applicable exceptions.

As a data subject, you have in particular:

- **right to request access** to personal data according to article 15 of the EU Regulation that we process on you. This right includes the right to confirm whether we process personal data about you, the right to access this data and the right to obtain a copy of the personal data we process about you, if technically feasible. The withdrawal of consent does not affect the lawfulness of the processing of personal data that we have processed about you on its basis;
- **right to rectification and completion** of personal data according to article 16 of the EU Regulation if we process incorrect or incomplete personal data; We strive to ensure the accuracy, completeness and timeliness of the information we have about you.
- **right to erasure** according to article 17 of the EU Regulation; you have the right to ask us to erase your personal data, but your right must be assessed from the perspective of all relevant circumstances.
- **right to restriction of processing** of personal data according to article 18 of the EU Regulation; If you think that the personal information, we hold about you may be inaccurate or if you think that we no longer need to use your personal information, you may ask us to stop using your personal information.
- **right to data portability** according to article 20 of the EU Regulation if the processing of personal data is based on a legal basis of consent under the performance of the contract;
- if we process personal data about you on the basis of your consent to the processing of personal data, you have the right to **withdraw your consent** at any time;
- **the right** at any time to **object** effectively to the processing of personal data for the purposes of direct marketing (only a sending of a marketing newsletter); you can apply this right either by unsubscribing from the text of each marketing-oriented email or by sending an objection to our contact details below;
- **right to lodge a complaint** at the Office for Personal Data Protection of the Slovak Republic at any time or to deal with the action in the competent court. In any case, we recommend resolving any disputes, questions or objections primarily by communicating with our company.

All questions and comments on the protection of personal data, or requests for exercising the rights under the EU Regulation, you can send to the contact points listed in the introduction of this document in chapter "1. Identification and contact details of the company".

**The controller is eligible to update and supplement this document, by which it fulfils its notification obligation on the processing of personal data towards the data subject.**

**The controller continuously updates this document and publishes it on its website.**