

# 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
<i>Fulfilling the employer's obligations relating to the employment relationship and similar relationships</i>	<i>Article 6, par.1, letter b) GDPR (relevant employment contract or agreement), Act No. 311/2001 Coll. Labour Code, as amended, Act No. 5/2004 Coll. on employment services and on amendments and additions to certain acts, as amended</i>	<i>employees, spouses of employees, dependent children of employees, parents of dependent children of employees, close relatives, former employees</i>	<i>Accace s.r.o., FPT SOFTWARE COMPANY LIMITED</i>	<i>up to 70 years of age or 50 years after termination of employment</i>
<i>Fulfilling the employer's obligations towards the social insurance institution</i>	<i>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 and additions to certain acts, as amended, Act No. 462/2003 Coll. on income compensation in case of temporary incapacity for work of an employee and on amendments and additions to certain acts, as amended</i>	<i>employees, spouses of employees, dependent children of employees, parents of dependent children of employees, close relatives, former employees</i>	<i>Social insurance company</i>	<i>10 years</i>
<i>Fulfilling the employer's obligations towards the health insurance company</i>	<i>Act No. 580/2004 Coll. on health insurance and on amendments to Act no. 95/2002 Coll. on the insurance industry and on the amendment of certain acts, as amended</i>	<i>employees, spouses of employees, dependent children of employees, parents of dependent children of employees, close relatives, former employees</i>	<i>Health insurance companies</i>	
<i>Fulfilling tax obligations</i>	<i>Act No. 595/2003 Coll. on income tax, as amended, Act No. 563/2009 Coll. on tax administration (tax code) and on amendments to certain acts</i>	<i>employees and their close relatives</i>	<i>Tax office</i>	
<i>Fulfilling the employer's health and safety obligations</i>	<i>Act No. 124/2006 Coll. on safety and health protection at work and on amendments to certain laws, as amended, Act No. 355/2007 Coll. on the protection, support and development of public health and on the amendment of certain acts, as amended</i>	<i>employees</i>	<i>training entity</i>	<i>5 years after the end of the obligation or the termination of the obligation</i>
<i>Employer's pay policy</i>	<i>Act No. 311/2001 Coll. the Labor Code, as amended, Act No. 580/2004 Coll. on health insurance and on amendments to Act no. 95/2002 Coll. on the insurance industry and on the amendment of certain acts, as amended, Act No. 461/2003 Coll. on social insurance, as amended, Act No. 595/2003 Coll. on income tax, 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, Act No. 5/2004 Coll. on employment services and on amendments to certain acts, as amended, Act No. 462/2003 Coll. on income compensation for temporary disability of an employee and on amendments to certain acts, as amended, Act No. 152/1994 Coll. on the social fund and on amendments to act no. 286/1992 Coll. on income taxes, as amended</i>	<i>employees, dependent children of employees, former employees</i>	<i>Health insurance companies, Social insurance company, Tax office, Supplementary pension company</i>	<i>up to 70 years of age or 50 years after termination of employment</i>

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<i>Presentation, promotion of the company consisting in the publication of photographs from events organized by the company</i>	<i>Article 6, par.1, letter f) GDPR (legitimate interest of the company)</i>	<i>employees, their family members</i>	<i>marketing agency</i>	<i>For a period of 3 years from the date of the event. Selected photos can be kept for a longer period (from the date of the company's establishment) as part of archival images used in the communication of the company's historical milestones.</i>
<i>Presentation, promotion of the company and the Fpt Group by publishing photographs and video footage of employees</i>	<i>Article 6, par.1, letter a) GDPR (approval)</i>	<i>employees</i>	-	<i>in terms of the consent granted</i>
<i>Record of job applicants</i>	<i>Article 6, par.1, letter a) GDPR (approval)</i>	<i>Job applicants</i>	<i>LMC s.r.o.</i>	<i>1 year/from 8_2022 for 2 years</i>
<i>Fulfillment of obligations</i>	<i>Article 6, par.1, letter b) GDPR (fulfillment of the contract), Article 6, par.1, letter f) GDPR (legitimate interest of the company), Act No. 250/2007 Coll. on consumer protection, Act No. 40/1964 Coll., the Civil Code, as amended, Act no. 513/1991 Coll. Commercial code, as amended</i>	<i>customers, suppliers, their employees, contact persons</i>	-	<i>Until the proper fulfillment of the contractual relationship (during its duration and until the expiration of the deadlines for applying any claims, but max. 3 years from the fulfillment of the subject of the contractual relationship. Or for the period determined by a special regulation.</i>
<i>Processing of accounting, bookkeeping and economic documents</i>	<i>Act No. 431/2002 Coll. on accounting, as amended, Act No. 222/2004 Coll. on value added tax, as amended, Act No. 145/1995 Coll. on administrative fees, as amended, Act No. 40/1964 Coll., the Civil Code, as amended, Act No. 311/2001 Coll., the Labour Code, as amended, Act No. 513/1991 Coll., the Commercial Code, as amended,</i>	<i>employees, customers, suppliers</i>	<i>external tax advisers and auditors, tax office</i>	<i>10 years</i>
<i>Interpersonal communication</i>	<i>Article 6, par.1, letter a) GDPR (approval), Article 6, par.1, letter f) GDPR (legitimate interest of the company)</i>	<i>any person concerned</i>	-	<i>max. 1 year after termination of communication</i>
<i>Administration of the registry</i>	<i>Law No. 395/2002 Coll. on archives and registries</i>	<i>employees, customers, suppliers, other affected persons</i>	-	<i>5 years, unless otherwise provided for under the Act referred to in the legal basis and internal guidelines</i>
<i>Security, property protection - Camera system and physical security records</i>	<i>Article 6, par.1, letter f) GDPR (legitimate interest of the company)</i>	<i>employees, customers, other affected persons</i>	<i>provider of private security services</i>	<i>max. 15 days</i>
<i>Collective employment relations</i>	<i>Act No. 152/1994 Coll. on the Social fund and on amendments to Act no. 286/1992 Coll. on income taxes, as amended, § 229 to § 250a of Act No. 311/2001 Coll. Labor Code as amended, Collective Agreement</i>	<i>employees</i>	<i>employee representatives</i>	<i>10 years</i>

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Recording and handling of complaints submitted for the investigation of anti-social activities	Act No. 307/2014 Coll. on certain measures related to the reporting of anti-social activity and on the amendment of some acts	the person submitting the complaint and other persons necessary for the investigation of the complaint	-	until the purpose is fulfilled and in accordance with the law specified in the legal basis
Recording of entrances to the company's premises (security, protection of property and health)	Article 6, par.1, letter f) GDPR (legitimate interest of the company)	employees and other natural persons entering the premises of the company	private security service provider	1 year
Corporate agenda management	Act No. 513/1991 Coll., the Commercial Code, as amended	partners, managing directors, members of company bodies	advocate	until the fulfilment of the purpose and within the meaning of the act referred to in the legal basis
Debt collection and litigation	Article 6, par.1, letter f) GDPR (legitimate interest of the company), Act No. 40/1964 Coll., the Civil Code, as amended, Act No. 513/1991 Coll., the Commercial Code, as amended, Act No. 233/1995 Coll. on executor and enforcement activity (Executive Regulations), as amended, Act No. 160/2015 Coll. Civil procedure code, as amended	employees, customers, suppliers	advocate, executor	10 years after the final conclusion of the litigation or recovery of the claim
Attendance records	Act No. 311/2001 Coll., the Labour Code, as amended	employees	-	Minimum 20 years, more only in accordance with the registry rules or other regulations
Security and stability of the company's information systems and network	Article 6, par.1, letter f) GDPR (legitimate interest of the company) – consisting in the protection of rights, legally protected interests and property in their ownership, as well as in the protection of rights and legally protected interests and property in their ownership of other persons and in ensuring the proper operation of IT systems, infrastructure and applications, their security and protection against disruption)	employees and other affected persons	-	in accordance with internal guidelines
Handling requests from data subjects to request the exercise of their rights	GDPR Act No. 18/2018 Coll. on the protection of personal data, as amended	affected persons	-	until the applications are properly processed
Fulfillment of the employee posting contract	Article 6, par.1, letter b) GDPR (fulfillment of the contract) Act No. 351/2015 Coll. on cross-border cooperation in sending employees to perform work in the provision of services and on amendments to certain acts	seconded employees	FPT SOFTWARE COMPANY LIMITED	10 years

## 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;

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## 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

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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.

## 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.**

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