

**INFORMATION OBLIGATION AS REFERRED TO in 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**

## **Protection of your personal data is important to us**

We take the protection of your personal data very seriously and we also try to ensure your right to information.

The legal basis is formed mainly by Act No. 18/2018 Coll. on Personal Data Protection, and on amendments and supplements to certain acts (hereinafter referred to as the "Personal Data Protection Act"), and REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (hereinafter referred to as "GDPR").

When processing your personal data, we also follow the principles of lawfulness, personal data purpose limitation, extent and storage limitation, accuracy, integrity, confidentiality and accountability.

### **1. Data controller**

#### **Greyson Consulting s.r.o.**

Registered office: Klincová 37/B, 821 08 Bratislava

Company ID No (IČO): 36846686

Tax Reg. No (DIČ): 2022464620

Executive officers: Ing. Branislav Čavojský  
Ing. Peter Juríček, PhD.  
Ing. Jiří Okoš  
Ing. Roman Suchánek

### **2. Data protection officer's contact data**

With regard to the extent and the subject of its activities, our company is not obliged to appoint a data protection officer. Nonetheless, should you have any questions in relation to your personal data, you may e-mail us at [gdpr@greyson.eu](mailto:gdpr@greyson.eu), call us on +421902441173 or visit us at: Karadžičova 8/A, 821 08 Bratislava, CBC I.

### **3. The purpose of personal data processing**

The company processes all provided personal data for several purposes:

- Processing contractual and pre-contractual obligations;
- Processing the personnel and wage agenda;
- Processing the accounting agenda;
- Organizing occupational health and safety, fire prevention and the occupational health service;
- Taking steps to reveal any acts of corruption;
- Keeping records of job-seekers;

## **INFORMATION OBLIGATION AS REFERRED TO in 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**

- Providing an employee benefit (MultiSport card);
- Organizing preventive medical checks.

### **4. Legal basis for processing the personal data of data subjects**

When processing personal data, the company acts in accordance with the valid and applicable Act No. 18/2018 Coll. on Personal Data Protection, and on amendments and supplements to certain acts (hereinafter referred to as the “Personal Data Protection Act”), and with REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (hereinafter referred to as “GDPR”).

The legal basis for personal data processing is formed by:

- the consent of data subjects to the personal data processing, depending on the purpose of the personal data processing;
- performance of contracts which data subjects are contracting parties of;
- special legislation, in particular: the **Personal Data Protection Act; the Social Insurance Act; the Labour Code; applicable wage and accounting regulations; the Commercial Code; the Civil Code; the Trade Licensing Act; the Occupational Health and Safety Act; and the Public Health Protection, Support and Development Act;**
- personal data processing is necessary for protection of the vital interests of data subjects; or
- the legitimate interest of the company.

### **5. Data subjects’ consent**

The company collects all consent of data subjects freely, without applying any pressure or force, and without threatening to reject a contractual relationship, any services provided or any obligations resulting to the controller from legally binding EU Acts, international contracts to which the Slovak Republic is bound by, or law.

Consent is given separately for each purpose of personal data processing.

You as a data subject may withdraw your consent at any time in the same form as it was given.

The company respects your privacy and all personal data provided is considered to be confidential.

### **6. Recipients**

In order to be able to provide high-quality services, the company needs to know certain personal data of data subjects and needs to provide such data to other recipients for the purpose of performing its lawful obligations and providing top-quality services.

When performing its business activities, the company cooperates with several processors whose aim is to provide high-quality services, while when performing their contractual activities for the company, such entities process the personal data of data subjects. They include e.g. supporting services related to processing and **provision of accounting and wage services (ESCAPE CONSULT SK, spol. s r.o.), OHS, fire prevention and occupational health service (Education, s.r.o.), employee**

**INFORMATION OBLIGATION AS REFERRED TO in 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**

**benefit – MultiSport card (MultiSport Benefit s.r.o.), medical examinations (MIOMED s. r. o.) and webhosting (EXO TECHNOLOGIES spol. s r.o.).**

The company solemnly represents that, when selecting individual processors, it considered their professional, technical, organizational and personnel competence and their ability to ensure the safety of the processed personal data by any security measures taken as referred to in the Personal Data Protection Act.

At the same time, when selecting suitable processors, the company acted in such a manner as to not jeopardize the rights and legally protected interests of data subjects.

In accordance with Article 28 (3) of the Regulation, the company as the controller has concluded written contracts with the processors on the protection of personal data processed by the processors whom it has authorized to process the personal data of data subjects in the extent, under the conditions and for the purpose as agreed upon in the contract and in the form as referred to in the Personal Data Protection Act.

The company provides information also to **third parties** - health insurance agencies; the Social Insurance Agency; the Tax Authority; the Labour Office; the Office of Labour, Social Affairs and Family; asset management companies, the Czech branch of Greyson Consulting, s.r.o., and others (banks, commercial insurance companies, enforcement agent, etc.).

## **7. Conditions and form of processing the personal data of data subjects**

The company processes the personal data of data subjects in its information systems by means of fully or partially automated and non-automated means of processing.

The company does not disclose the processed personal data with the exception of cases when it is required to by special legislation or by decisions of courts or other state authorities.

The company will not process your personal data without your explicit consent or without any other lawful legal basis for any other purpose or in a greater extent than contained herein and in the registration sheets of individual controller's information systems.

## **8. Storage period of data subjects' personal data**

The storage period of personal data is determined according to the purpose of the personal data's processing and according to requirements of special regulations.

Particular storage periods are specified in the Registry Plan, an internal regulation of the company prepared in accordance with the Archives and Registries Act.

The company will use the mandatory form to erase such personal data the purpose of processing and the storage period of which has terminated. After termination of the specified purpose the company is authorized to process personal data in the necessary extent of and in an anonymized form for research or statistical purposes.

**INFORMATION OBLIGATION AS REFERRED TO in 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**

The company makes sure that all data subjects' personal data is processed in a form enabling identification of individual data subjects during a period which is not longer than is necessary for achieving the purpose of processing.

**9. Automated individual decision-making, including profiling**

Currently, the company does not perform automated individual decision-making when performing its business activities. If such decision-making is applied, the company will inform the data subjects thereof using all means available.

**Social network cookies**

Social networks may also collect your personal data for their own needs. Our company has no effect on how your personal data is used by social networks. You may find more information about cookies stored by social networks and about the data they collect in their own privacy policies. Below you may find references to the privacy policies of major social networks which our company uses most frequently:

Facebook      <https://www.facebook.com/privacy/explanation>

LinkedIn      <https://www.linkedin.com/legal/privacy-policy>

**10. Transfer of personal data to third countries and international organisations**

The company does not transfer any data to third countries or international organisations.

**11. Rights of data subjects related to their personal data processing**

Based on a written request, data subjects have the right to ask the company:

- for accurate information, provided in a generally intelligible form, about the source from which the company has collected their personal data for processing;
- for access to their personal data;
- for a list of their personal data which is the subject of processing, provided in a generally intelligible form;
- for correction or erasure of any wrong, incomplete or obsolete personal data which is the subject of processing;
- for erasure of their personal data the processing purpose of which has terminated; if any official documents containing personal data are the subject of processing, they may ask the company to return those;
- for erasure of their personal data which is the subject of processing, if the law has been breached;
- to limit the processing of their personal data;
- based on a written request sent to the company by post or delivered in person, if the matter is urgent, data subjects have the right to object to their personal data being processed by expressing legitimate reasons or by submitting evidence of any unauthorized interference with their rights and legally protected interests which are or may be infringed upon in the particular case by such personal data processing; if it is not impossible due to legitimate

**INFORMATION OBLIGATION AS REFERRED TO in 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**

reasons and if it has been proved that the objection of the data subject is justified, the company is obliged to immediately block the personal data the processing of which the data subject has objected to and to erase it as soon as practicable;

- not to process their personal data in relation to which the data subjects suppose that it is or will be processed for direct marketing purposes without their consent, and to erase it;
- to transfer their personal data to a different controller;
- if the provision of personal data is a legitimate requirement or contractual requirement or a requirement which is necessary for concluding a contract and if the data subject is obliged to provide their personal data, and about all potential consequences if they fail to provide their personal data;
- for their right to complain to a supervisory authority;
- for their right to file a motion for initiating proceedings as referred to in § 100. When suspecting that their personal data is being processed without authorization, data subjects may file a motion for initiating proceedings regarding personal data protection to the Office for Personal Data Protection of the Slovak Republic with its registered office at Hraničná 12, 820 07 Bratislava 27, Slovak Republic, or to contact the Office through its web page at <http://www.dataprotection.gov.sk>.

If data subjects do not have a full legal capacity, their rights may be exercised by a legal representative.

If data subjects have died, the rights they had pursuant to the Act may be exercised by their close person.

In accordance with the Personal Data Protection Act, the motions of data subjects will be attended to by the company free of charge, with the exception of a payment which cannot exceed the amount of purposefully expended material costs related to making copies, buying technical media and sending information to the data subjects, unless stipulated otherwise by special legislation.

The company is obliged to attend to any request of data subjects in writing no later than 30 days after the request's delivery date.

The company will report any restriction of the rights of data subjects as referred to in the Personal Data Protection Act to the data subjects and to the Office for Personal Data Protection of the Slovak Republic in writing and without any undue delay.

**The company has herewith informed you, as a data subject, about the protection of your personal data and about your rights in relation to personal data protection in the extent of the present written information obligation.**

In Bratislava, 25 May 2018

Ing. Branislav Čavojský, executive officer  
Ing. Jiří Okoš, executive officer  
Ing. Peter Juríček, PhD., executive officer  
Ing. Roman Suchánek, executive officer