

## Information about the processing of personal data

The processing of personal data of the Data Subject is governed by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons in the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation) ("**regulation**") and Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments to Certain Acts ("**Act on the Protection of Personal Data**").

The purpose of this document is to explain how the personal data of Data Subjects are processed and what their rights according to the Regulation and the Act on Personal Data Protection.

### 1 Controller

Company, **BTS Cargo & Hangar Services, as**, with its registered office at Ivánska cesta 91, 821 04 Bratislava, ID: 35 971 703, registered in the Commercial Register of the Bratislava I District Court, Section: Sa, File Number: 3777/B ("**company**") is a person who, alone or together with others, determines the purposes and means of processing the personal data of the Data Subject.

### 2 Obtaining of personal data

The company obtains personal data in the following ways:

- directly from its contractual partners when concluding a contract;
- from publicly available sources, e.g. public registers and records;
- from people who have voluntarily provided their personal data to the company and have given their consent to their processing (by telephone, email, through the company's website, etc.);
- from people entering the company's premises (including records from the camera system of the company).

The company obtains and processes personal data only to the extent appropriate to the purpose of its processing. The company places special emphasis on the security and protection of personal data and the rights of the Data Subject.

### 3 Legal basis and purpose of processing

The company processes personal data on the basis of the following legal titles laid down in the Regulation and the Act on the Personal Data Protection:

- Legitimate interest

The company may process the personal data of the Data Subject if this is necessary for the legitimate interests of the company or third parties but only in the exception of cases when such interests prevail over the interests or fundamental rights and freedoms of the Data Subject that require the protection of personal data, mainly if the Data Subject is a child. Such legitimate interests of the company are mainly the following:

- the protection of the rights that companies derive from the generally binding legislation and contracts in relation to contractual partners and other persons; for this purpose, the company retains personal data for a maximum of ten years from the termination of the contractual relationship;
- the recovery of receivables and other claims of the company; for this purpose, the company retains personal data for the duration of the relevant limitation periods;
- the prevention of fraudulent proceedings if the company reasonably believes that there is a risk of such conduct; for this purpose, the company retains personal data for a maximum of five years from the termination of the contractual relationship;
- protection of property, life and health and maintaining public order; for this purpose, the company maintains the personal data of people entering the premises of the company for a maximum of one

- month from the date of entry;
- the marketing activities of the company, which mainly include information about selected services or company news; communication may include surveys to improve the satisfaction of contractors as well as customized general and specialized business offers; marketing communication is sent occasionally, usually several times a year, at most approximately once a month; and for this purpose, the company retains personal data for the duration of the contractual relationship between the company and the Data Subject.

➤ Fulfillment of contract

The company processes the personal data of the Data Subject for purposes related to the fulfillment of the contractual obligations of both Contracting Parties, mainly the conclusion, amending and termination of the contract, the granting of powers of attorney by the Data Subject to the company, invoicing, etc. The provision of personal data by the Data Subject to the extent necessary is a condition for the conclusion of the contract. In failing to provide personal data, the delivery of goods and services to the Data Subject by the company may be impeded. The company will provide the Data Subject with information on which personal data are necessary for the conclusion of the contract and which may be provided, for example, for the purpose of increasing the effectiveness of communication.

The company retains personal data for the purposes of the fulfillment of the contract for the duration of the contractual relationship between the company and the Data Subject.

➤ Fulfillment of legal obligations

The company may process personal data, including their provision to state authorities and other persons, if such an obligation results from the law. For reasons of legal obligation, the company may, for example, provide personal data to law enforcement agencies or other authorities or persons.

The company retains personal data for the purpose of fulfilling legal obligations for a maximum of ten years from the end of the contractual relationship between the company and the Data Subject.

➤ Consent granted by the Data Subject

The company processes the personal data of the Data Subject on the basis of the consent expressly granted by the Data Subject.

The company retains personal data processed by the consent of the Data Subject until the consent is revoked, but before the expiry of the two-year period the company requests the Data Subject to renew the consent.

#### 4 Recipients of personal data

The company may entrust the processing of personal data to a third party, i.e. intermediaries. The intermediaries of the company are, e.g. those who provide the company with certain marketing activities, external service providers, consulting companies, or security services. Intermediaries process personal data for a company exclusively on the basis of a contract for the processing of personal data, which must comply with the requirements laid down by the Regulation and the Act on the Personal Data Protection and, in such cases, the company strictly maintains the protection of personal data it provides to intermediaries.

In some cases, the company may provide the personal data of the Data Subject to intermediaries located outside the Member States of the European Union and those that are not party to the Agreement on the European Economic Area ("**third countries**"), which currently do not guarantee an adequate level of protection of personal data. Where a company provides personal data of the Data Subject to an intermediary in third countries, it will indicate whether or not there is a European Commission decision on adequacy or a reference to appropriate or suitable guarantees and means of obtaining their copy or a place for their publication.

## 5 Rights of the data subject

The Data Subject has the following rights:

- to request from the company:
  - to confirm whether or not personal data are being processed; if personal data have not been obtained from the Data Subject, the Data Subject may request the provision of any available information regarding their source ("**the right of access to personal data**");
  - if their personal data are being processed, gain access to personal data and other information and receive a copy of the personal data the company is processing ("**the right to be informed about processing**"); the company is entitled to charge a reasonable administrative fee to the Data Subject in connection with the request for a copy of the personal data;
  - the correction of inaccurate/incomplete personal data being processed by the company ("**the right to correction**");
  - the deletion of personal data if any of the reasons given in the regulation or the law on the protection of personal data are fulfilled; mainly where personal data are no longer necessary for the purposes for which they were acquired or processed, if the Data Subject withdraws consent and the company has no other legal basis for processing if the Data Subject objects to the processing or the company has processed the personal data unlawfully; if the official documents containing personal data are processed, the Data Subject may request that they be returned ("**right of deletion**");
  - restriction on the processing of personal data if any of the reasons stated in the Regulation and the Act on the Personal Data Protection are fulfilled; for example, if the Data Subject indicates that the company is processing incorrect personal data about it, he/she may request that such personal data not be processed until they are corrected ("**right of restriction**");
  - obtaining personal data relating to him/her and provided by the company in a structured, commonly used and machine-readable format; the Data Subject has the right to transfer such personal data to another operator if this is technically possible and if the conditions set out in the Regulation and the Act on Personal Data Protection are fulfilled ("**the right to portability**");
- objecting to reasons relating to a specific situation against the processing of personal data concerning him/her, which is necessary for the legitimate interests pursued by the company or a third party, except where such interests prevail over the interests or fundamental rights and freedoms of the Data Subject, which require the protection of personal data, including the objection against profiling; objecting to reasons relating to a specific situation against the processing of personal data concerning him/her, which are necessary for the fulfillment of a task implement in the public interest, including objection to profiling; objecting to the processing of personal data for the purposes of direct marketing without his/her consent, including profiling to the extent that it relates to such direct marketing ("**right to object**");
- to object, in order not to be related to the decision-making of the company, which is solely based on automated processing, including profiling, which has legal ramifications, affecting him/her or similarly significantly affect him/her unless the Regulation and the Act on Personal Data Protection provide otherwise ("**automated decision-making including profiling**");
- revoke consent at any time to the processing of personal data granted to the company with effect from the moment of revoking consent ("**right to revoke consent**");
- in the suspected unauthorized processing of personal data, file a proposal for the initiation of a procedure for the protection of personal data with the Office for the Protection of Personal Data of the Slovak Republic, with its registered office in Hraničná 4826/12, 820 07 Bratislava, Slovak Republic, telephone: + 421 2 3231 3220, [www.dataprotection.gov.sk](http://www.dataprotection.gov.sk).

If the Data Subject has no legal capacity to the fullest extent, his/her rights under the Regulation and the Act on Personal Data Protection may be invoked by a legal representative. The rights of a Data Subject within the meaning of the Regulation and Act on Personal Data Protection who is not alive, may apply to a close person.

The Data Subject may exercise his/her rights in the following manners:

In terms of the potential risks of misuse and the ensuring the protection of the personal data of the Data Subject, the company sets forth the means of communication that can be adopted and respond to the Data Subject's request in relation to the personal data the company is processing. The company also considers the technical aspects of several rights of the Data Subject and adjusts the means of communication to ensure the rights of the Data Subject. In case of any doubt as to the identity of the Data Subject, the company is entitled to request the additional verification of his/her identity.

*the right to access and the right to be informed of the processing, the right to correction, the right of cancellation, the right of restriction, the right of portability, the right to object, automated decision-making, including profiling, and the right to revoke consent*

- personally at the registered office of the company;
- through a posted letter (*the signature of the Data Subject must be officially certified if the right of access is exercised*) sent to the registered address of the company;
- by e-mail to [btscargo@btscargo.sk](mailto:btscargo@btscargo.sk);
- by phone to the company line +421 915 878 963.

## **6 Automated decision-making including profiling**

The company does not perform automated decision-making, including the profiling of the Data Subject's personal data, which has legal ramifications that relate to him/her or have some similar significant impact.