INFORMATION ON PERSONAL DATA PROCESSING

within the meaning of Article 12, 13 and 14 of the GDPR
(hereinafter referred to only as the "Information")

The information describes how BRANDERA, s.r.o., the controller, with its registered office at Partizánska 76/62, Nitra 949 01, Company Reg. No.: 51 784 831, registered in the Company Register of the Nitra District Court, Section: Sro, File No.: 45906/N (hereinafter referred to only as the "Controller") processes personal data. If anything from this Information is unclear or incomprehensible to you, we will be happy to explain any term or part to you. We process personal data in accordance with the requirements of the GDPR, the Act No. 18/2018 Coll. on the Protection of Personal Data and on the amendment and supplementation of certain acts as later amended and with other generally binding legal regulations.

1. BASIC TERMS

a. **Personal data** – any information relating to an identified or identifiable natural person, for example name, surname, date of birth, birth registration number, telephone number, e-mail address, IP address, etc.

b. **GDPR** - Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the Protection of Natural Persons with regard to the Processing of Personal Data and on the Free Movement of Such Data, repealing the Directive 95/46/EC (General Data Protection Regulation).

c. **Data subject** – a natural person to whom the personal data relate.

d. **Processing of personal data** – an activity or processing operations that the controller or processor performs with personal data.

e. **Controller** – a natural person or legal entity that determines the purpose and means of personal data processing.

f. **The purpose of personal data processing**– a clearly defined or established purpose of personal data processing in advance, which is linked to a certain activity.

g. **Legitimate interest** – an interest of the controller or a third party, which results in the need to process personal data if it does not prevail over the interests or fundamental rights and freedoms of the data subject.

h. **Recipient** – a natural or legal person, public authority, agency or other subject to whom personal data is provided.

2. PERSONAL DATA CONTROLLER

The personal data controller is:

Controller:	**BRANDERA, s.r.o.**
Legal form:	limited-liability company

Registered office:	Partizánska 76/62, Nitra 949 01, the Slovak Republic
E-mail:	jana.kubinova@brandera.sk
Telephone number:	0905376189

3. PURPOSES AND LEGAL BASES OF PROCESSING

Purpose	**Legal basis**
Accounting	Section 6 (1) c) of the GDPR – fulfilment of a legal obligation Section 6 (1) b) of the GDPR – performance of a contract
Ensuring network security	Section 6 (1) f) of the GDPR - legitimate interest of the controller
GDPR agenda	Section 6 (1) c) of the GDPR – fulfilment of a legal obligation
Delivery contracts	Section 6 (1) b) of the GDPR – performance of a contract Section 6 (1) f) of the GDPR - legitimate interest of the controller
Providing customer services	Section 6 (1) b) of the GDPR – performance of a contract Section 6 (1) f) of the GDPR - legitimate interest of the controller
Website (cookies)	Section 6 (1) a) of the GDPR - consent
Contact form	Section 6 (1) f) of the GDPR – legitimate interest
Setting up a user account	Section 6 (1) a) of the GDPR - consent

Legitimate interest	**Characterisation**
Ensuring network security	the legitimate interest of the controller in guaranteeing security - the obligation according to the GDPR to introduce adequate security measures, which also includes records of the activities of entities accessing the controller's environment

Delivery contracts	legitimate interest of the controller as well as of third parties in the performance of contracts
Providing customer services	legitimate interest of the controller as well as of third parties in the performance of contracts
Contact form	legitimate interest of the controller to process personal data voluntarily provided by the data subjects in order to establish mutual communication

4. LEGITIMATE INTERESTS OF THE CONTROLLER OR THIRD PARTY

The controller currently does not process personal data for any purpose exclusively on a legal basis, which would be the legitimate interest of the controller.

5. RECIPIENTS

The recipient is any person to whom personal data is made available by the controller, regardless of the fact whether it is a third party. The data processed by the controller is made available to the following recipients, depending on individual purposes of processing:

- persons who process personal data on the basis of direct authorization of the controller (external staff, persons working on the basis of agreements outside an employment relationship, and so on)
- intermediaries (web-hosting provider, accounting company);
- managing director/managing directors;
- members of the company bodies (partners);
- state authorities (tax authority, the Social Insurance Institution, the Labour, Social Affairs and Family Bureau, the Office for Personal Data Protection, courts, law enforcement authorities, authorities for contravention proceedings, etc.);
- health insurance companies, executor, supplementary pension savings banks, pension management companies, employee representatives;
- other authorized entity can be the recipient as well.

6. TRANSFER TO THIRD COUNTRY AND INTERNATIONAL ORGANIZATION

In principle, the controller does not carry out the transfer of personal data to a country outside the territory of the EU (EEC), nor does it intend to do such transfer.

7. RETENTION PERIOD

We keep personal data in the form that enables identification for the maximum period of time that is inevitable for achieving the purpose for which the personal data is processed. Retention periods/time limits for erasure or the criteria for determining such periods/time-limits are documented in the records on processing activities which we will provide to you upon your request.

8. RIGHTS OF THE DATA SUBJECT

Data subjects have the following rights:

a. Information on the processing of personal data

The content of the information is mainly the identity and contact details of the controller, processing purposes, categories of affected personal data, recipient or categories of recipients of personal data, information on the transfer of personal data to third countries, the period of retention of personal data, authorized controllers, specification of your rights, the possibility to contact the Office for Personal Data Protection of the Slovak Republic, source of processed personal data, information on whether and how automated decision-making and profiling takes place.

b. Right of access to personal data

You have the right to confirm whether or not personal data is processed and, if so, you have the right to access information about the purposes of processing, categories of personal data affected, recipients or categories of recipients, the period of retention of personal data, information about your rights, about the right to submit complaint to the Office for Personal Data Protection of the Slovak Republic, information on the source of personal data, information on whether automated decision-making and profiling takes place, information and guarantees in case of a transfer of personal data to a third country or international organization. You have the right to be provided a copy of the processed personal data.

c. Right to rectification

The data subject has the right to rectification of incorrect personal data. With regard to the purpose of processing, the data subject has the right to supplement incomplete personal data, also by providing a supplementary statement.

d. Right to erasure (right to be forgotten)

In some cases provided by law, we are obliged to delete the personal data of the data subject. However, each such request is subject to an individual evaluation of whether the conditions are met, because as the controller we may be bound by a legal obligation or we may process personal data based on a legitimate interest. If our legitimate interest (or the legitimate interest of a third party) prevails over the interests of the data subject, we are entitled to continue to process personal data for the purpose in question.

e. Right to restrict processing

The data subject can request the controller to restrict the processing of personal data if any of the following situations occur:

- the data subject refused the accuracy of the personal data, for the time necessary for the controller to verify the accuracy of the personal data;
- the processing of personal data is unlawful, but the data subject refuses to delete this data and instead requests the restriction of its use;

- the controller no longer needs the personal data for processing purposes, but the data subject requires them for determining, exercising or defending legal claims;
- the data subject has raised an objection to the processing of personal data in specific situations pursuant to the GDPR (a task carried out in the public interest, legitimate interest of the controller or profiling), until it is verified that the legitimate interests of the controller prevail over the legitimate interests of the data subject.

f. Right to data portability

If the data subject requests that we transfer their personal data to other controller, we transfer the personal data in the corresponding format to the designated entity, if there are no legal or other significant obstacles preventing us from doing so.

g. Right to object and automated individual decision-making

The data subject has the right to object any time to the processing of their personal data and which is carried out on the legal basis of public interest or legitimate interest. **The data subject may object to the processing of personal data by the controller for the purposes of direct marketing any time, including profiling to the extent that it is related to such direct marketing.**

h. Processing based on consent (right to withdraw consent)

In the event that the processing is based on the consent of the data subject within the meaning of Section 6 (1) a) of the GDPR or Section 9 (1) a) of the GDPR, data subjects have the right to withdraw their consent at any time. Such withdrawal of the consent does not affect the lawfulness of processing based on consent granted before its withdrawal.

i. Right to submit a proposal, initiative, complaint to the supervisory authority

Data subjects may contact the supervisory body at any time, which is the Office for the Personal Data Protection of the Slovak Republic, with its registered office at Hraničná 12, 820 07 Bratislava 27, the Slovak Republic, with a proposal, initiative, or complaint regarding the processing of personal data, Tel.: +421/2/3231 3220, website: www.uoou.sk.

❖ **Time-limit for response**

We will provide a statement and possibly information about the measures taken as soon as possible, but within one month at the latest. We are authorized to extend the time-limit by two months, if necessary, due to the complexity and the number of requests. We will inform the data subject about the extension of the time-limit, including the specification of the reason therefor.

❖ **Contacts**

Individual rights may be exercised by data subjects with the controller, specifically by e-mail to the address: Jana.kubinova@brandera.sk or in writing to the

correspondence address: BRANDERA, s.r.o., Partizánska 76/62, Nitra 949 01, the Slovak Republic.

We provide all notices and statements regarding the exercised rights free of charge. However, if the request would be manifestly unreasonable or inadequate, in particular because it would be repeated, we are authorized to charge a reasonable fee taking into account administrative costs or to refuse to act upon such request. In case of a repeated request to provide copies of the processed personal data, we reserve the right to charge a reasonable fee for administrative costs.

9. PROVISION OF PERSONAL DATA

The provision of personal data is voluntary, and therefore the provision of data to us as a controller, since we are a private legal entity, is not a legal requirement. If you are interested in concluding a contract with us, the provision of personal data may be necessary for the contract conclusion. In such case, the provision is a contractual requirement. The data subject is not obliged to provide their personal data, they provide them voluntarily. The refusal to provide personal data has no negative consequences for the data subject.

10. AUTOMATED DECISION-MAKING AND PROFILING

The controller does not use the so-called automated individual decision-making, including profiling.

11. PROCESSING FOR OTHER PURPOSE

When processing, we respect the principle of limiting the purpose of processing, i.e. we process data only on the basis of a specifically determined, explicitly stated and legitimate purpose, with the exception of the case if it is processing for a compatible purpose. Processing for another purpose may be also based on the consent of the data subject, the law of the European Union or the Slovak Republic. In order to find out whether another purpose is compatible with the purpose for which the personal data was originally obtained, prior to the commencement of the processing, we will perform the so-called a compatibility test in which we take into account:

a. any link between the purposes for which the personal data was obtained and the purposes of the intended further processing;
b. the circumstances under which the personal data was obtained, especially regarding the relationship between the data subjects and the controller;
c. the nature of personal data, in particular whether special categories of personal data are processed pursuant to Section 9 of the GDPR or personal data related to the conviction for criminal offences and infringements pursuant to Section 10 of the GDPR;
d. possible consequences of the intended further processing for data subjects;
e. the existence of adequate safeguards, which may include encryption or pseudonymisation.

12. OVERVIEW OF SELECTED LEGAL REGULATIONS IN THE FIELD OF PERSONAL DATA PROTECTION

- Charter of Fundamental Rights of the European Union (Section 8)
- 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 the Directive 95/46/EC (General Data Protection Regulation)
- Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the Processing of Personal Data and the Protection of Privacy in the Electronic Communications Sector (Directive on Privacy and Electronic Communications) (consolidated version)
- Act No. 351/2011 Coll. on Electronic Communications as later amended
- Constitution of the Slovak Republic (published under No. 460/1992 Coll.)
- Act No. 18/2018 Coll. on the Protection of Personal Data and on the amendment and supplementation of certain acts as later amended
- Decree No. 158/2018 Coll. of the Office for Personal Data Protection of the Slovak Republic on the Procedure for Assessing the Impact on Personal Data Protection

13. USE OF COOKIES

The website www.adorgo.sk uses cookies that collect and store information during its browsing. Cookies are used for various purposes, e.g., for recording the choice made by the user while browsing the website or for recording the activity of the user while browsing the website. They may also be used to remember any optional information that the user has previously entered into forms on the website. Their use may be disabled in most Internet browsers. Pursuant to the GDPR (rec. 30), cookies are defined as online identifiers that, in combination with unique identifiers and other information obtained from servers, may be used for the creation of profiles of natural persons and for their identification, and are therefore considered personal data within the meaning of the GDPR. The controller may use cookies only with the user's consent. The user may revoke the granted consent to cookies at any time. Each user may express their consent to/disagreement with the use of cookies when visiting the website by means of the consent management tool (banner, CMP, bar). If the user does not express their consent to the use of cookies, the cookies will not be activated on the website.

We use the following cookies:

Cookie name	Provider	Type	Validity	Purpose
rc::a	gstatic.com	HTML necessary	permanent	This cookie is used to distinguish between humans and robots. It is good for the website to be able to generate valid reports about the usage of their website.
rc::c	gstatic.com	HTML necessary	it is deleted after the browser session ends	This cookie is used to distinguish between humans and robots.
_ga	adorgo.sk	HTTP statistical	2 years	It registers a unique ID that is used to generate statistical data about how the visitor uses the website.
_gat	adorgo.sk	HTTP statistics	1 day	The cookie used by the Google Analytics service to limit the speed of requests.

_gid	adorgo.sk	HTTP statistics	1 day	It registers a unique ID that is used to generate statistical data about how the visitor uses the website.

Necessary cookies: They are necessary for the usability of the website. They help build websites by enabling basic functionalities such as site navigation and access to the protected areas of websites. Websites cannot fully function without these cookies.

Statistical cookies: They help website owners to understand how to interact with website visitors by collecting and reporting information anonymously.

Marketing cookies: They are used to track visitors on websites. Their purpose is to display ads that are relevant and engaging to specific users, and thereby, more important for publishers and third-party advertisers.

14. CHANGES OF PERSONAL DATA PROCESSING RULES

We are authorized to change the wording of these personal data processing rules, especially in the event of the need to incorporate legislative changes or changes of the purpose and means of processing. In the event that there are changes of personal data processing rules that could affect the rights of the data subjects, we will notify the concerned data subjects of such fact in a suitable way in advance.

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