**PRINCIPLE OF PROTECTION OF PERSONAL DATA**

in accordance with Article 13 and the relevant recitals of the Regulation of the European Parliament and of the Council (EU) 2016/679 on the protection of natural persons in the processing of personal data and on the free movement of such data (hereinafter referred to as the "Regulation") and the Act of the NR SR no. 18/2018 Coll. on the protection of personal data

and on amendments to certain laws (hereinafter referred to as the "Act on Personal Data Protection")

The purposes of personal data processing are the reasons for which the personal data of affected persons (employees, clients, etc.) are processed in our information systems on precisely determined legal bases. The purposes are specifically determined, explicitly stated and authorized, while we comply with the principle of legality according to Article 6 of the Regulation when processing the personal data of the persons concerned (individual purposes and legal bases are listed in the annex to this Personal Data Protection Policy).

Affected persons whose personal data is processed in our information systems for specifically defined purposes may exercise the following rights in writing or electronically:

a) The right to access personal data – this is the right to obtain confirmation of whether your personal data is being processed as well as the right to obtain access to this data, within the scope of the purposes and duration of processing, the category of personal data concerned, the range of recipients, o procedure in each automatic processing, possibly about the consequences of such processing. As an operator, we have the right to use all reasonable measures to verify the identity of the data subject requesting access to the data, in particular in relation to online services and identifiers (Article 15, Recital 63, 64 of the Regulation).

b) The right to correct incorrect and supplement incomplete personal data (Article 16, Recital 65 of the Regulation).

c) The right to deletion - "forgetting" those personal data that are no longer necessary for the purposes for which they were obtained and processed; in the event of revocation of the consent on the basis of which the processing is carried out; in the event of illegal processing; if the personal data were obtained in connection with with the offer of the information society (for children), subject to the fulfillment of the conditions specified in Article 17, Recital 65, 66 of the Regulation.

d)  ـ The right  to restrict processing can be exercised if, as a data subject, you challenge the correctness of personal data and other details in accordance with Article 18, Recital 67 of the Regulation, in the form of temporarily moving selected personal data to another processing system, preventing users from accessing selected personal data data or temporary removal of processing.

e) The right to portability of personal data is the right to transfer the personal data provided by you to our information systems on the basis of consent or performance of the contract to another operator in a structured, commonly used and machine-readable format, as long as it is technically possible even under the conditions of Article 20 of the Recital 68 Regulations in case the processing is carried out by automated means. The exercise of this right does not affect Article 17 of the Regulation. The right to data portability does not apply to processing necessary to fulfill a task carried out in the public interest or in the exercise of public authority entrusted to us as the operator.

f) Without prejudice to any other administrative or judicial means of redress, you as the affected person have the right to file a complaint with the Office for Personal Data Protection of the Slovak Republic in accordance with Article 77 of the Regulation, if you believe that the processing of personal data concerning you is contrary to the Regulation or the Act on Personal Data Protection.

As a data subject, you also have the right to object at any time for reasons relating to a specific situation to the processing of your personal data, if the processing is necessary for the purposes of legitimate interests pursued by us as an operator or a third party, except in cases where your interests or basic rights and freedoms as a data subject that require the protection of personal data (especially if the data subject is a child).

If personal data is processed for the purposes of direct marketing, as a data subject you have the right to object at any time to the processing of your personal data for the purposes of such direct marketing, including profiling to the extent that it is related to such direct marketing.

The company CEWE as, IČO: 31 395 937, Galvaniho 716, 821 04 Bratislava, as the operator of the information system, has adopted all appropriate personnel, organizational and technical measures for the maximum protection of your personal data with the aim of reducing the risk of their misuse, leakage and the like as much as possible. . In accordance with our obligation arising from Article 34 of the Regulation, we inform you as the affected persons that if a situation arises that we, as the operator, violate the protection of your personal data in a way that is likely to lead to a high risk for the rights and freedoms of natural persons, we will notify you of this fact without undue delay .

WARNING: in order to comply with the principle of minimization, all personal data provided by you is a necessary legal or contractual requirement to fulfill the purpose of their processing. Failure to provide mandatory data necessary for concluding a contract may result in failure to conclude a contractual relationship.

In case of any questions related to the protection of your personal data, including the exercise of your rights in accordance with the Regulation and the Act on the Protection of Personal Data, please contact us at our email address [cewe@cewe.sk](mailto:cewe@cewe.sk) or the number 02/6820 4420

Annex to the Personal Data Protection Policy

**Purpose and legal basis of personal data processing**

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| **1 MANAGEMENT OF THE PERSONNEL AND PAYROLL AGENDA** | |
| The purpose of personal data processing | Fulfilling the employer's obligations related to an employment relationship or a similar relationship (for example, based on agreements on work performed outside the employment relationship), including the health and safety agenda at work, the occupational health service, the agenda for improving the qualifications of employees and pre-contractual relations. |
| Information system name | Managing the personnel and payroll agenda |
| Legal basis | **Human resources and wages:**  The legal basis for the processing of personal data is the Constitution of the Slovak Republic, Act No. 311/2001 Coll. The Labor Code, as amended, Act of the National Assembly of the Slovak Republic No. 552/2003 Coll. on the performance of works in the public interest, as amended, Act of the NR SR no. 553/2003 Coll. on the remuneration of certain employees for the performance of work in the public interest and on the amendment and supplementation of certain laws, as amended, Act NR SR no. 595/2003 Coll. on income tax, as amended, Act NR SR no. 563/2009 Coll. on tax administration (tax code) and on amendments and additions to certain laws as amended, Act NR SR no. 461/2003 Coll. on social insurance, as amended, Act NR SR no. 600/2003 Coll. about child allowance and change                    and amendments to Act NR SR no. 461/2003 Coll. on social insurance, as amended, Act NR SR no. 462/2003 Coll. on compensation of income in case of temporary incapacity for work of an employee and on amendments and additions to certain laws as amended, Act NR SR no. 580/2004 Coll. on health insurance and on amendments and additions to certain laws, as amended, Act NR SR no. 650/2004 Coll. on supplementary pension savings, as amended, Act of the NR SR                                           no. 448/2008 Coll. on social services, as amended, Act NR SR no. 5/2004 Coll. on employment services as amended, Act NR SR no. 82/2005 Coll. on illegal work and illegal employment as amended, the Personal Data Protection Act and related legal regulations as amended, Act NR SR no. 152/1994 Coll. on the social fund and on amendments and additions to Act NR SR no. 286/1992 Coll. on income taxes, as amended, Act NR SR no. 43/2004 Coll. on old-age pension savings.  **OSH:** Act no. Act No. 124/2006 Coll. on safety and health protection at work and on changes and additions to certain laws, as amended, Decree No. 500/2006 Coll. MPSVaR, which establishes a sample Record       &         about a registered occupational accident, Act NR SR no. 314/2001 Coll. on fire protection, as amended, and its implementing regulations.  **Occupational health service:** Act no. 577/2004 Coll. on the scope of health care reimbursed on the basis of public health insurance and on payments for services related to the provision of health care, as amended, Act no. 578/2004 Coll. on health care providers, health workers, state-level organizations in the health sector and on amendments to certain laws as amended, Decree of the Ministry of Health of the Slovak Republic no. 448/200 Coll. on the details of work and work environment factors in relation to the categorization of work from the point of view of health risks and on the details of the proposal for classifying work into categories, Decree of the Ministry of Health of the Slovak Republic no. 208/2014 Coll.                                                                                                 on the details of the scope and content of the performance of the occupational health service, on the composition of the team of experts who perform it and on the requirements for their professional competence. |
| Categories of beneficiaries | Intermediary for the processing of HR, intermediary for the processing of the payroll agenda, intermediary for health and safety, intermediary for the processing of the agenda of the occupational health service, public authorities, state and public administration according to the relevant legal regulations, health insurance companies, supplementary pension savings banks, supplementary management companies. |
| Cross-border transfer of persons. data | It's not happening |
| Deadlines for deleting os. data | 70 years after the end of the employee's employment relationship |
| Information about the existence of automated decision-making, including profiling | It's not happening |
| **2 KEEPING THE ACCOUNTING AGENDA** | |
| The purpose of personal data processing | Processing of personal data of natural persons entering into payment transactions with the operator. In the information system in question, we also include the processing of orders, incoming invoices and customer invoicing, contact with the bank, managing the cash register, ensuring cash income and expenses, warehouse management, recording of investment property (including automatic depreciation) and small property, keeping single/double bookkeeping of the organization, conducting audits. |
| Information system name | Management of the accounting agenda |
| Legal basis | Law no. 460/1992 Coll. The Constitution of the Slovak Republic , as amended, Act No. 513/1991 Coll. Commercial Code as amended, Act NR SR no. 431/2002 Coll. on accounting, as amended, Act no. 222/2004 Coll. on value added tax as amended, the Personal Data Protection Act and related legal regulations as amended, Act No. 145/1995 Coll. on administrative fees , as amended, by Act NR SR no. 595/2003 Coll. on income tax, as amended, by Act NR SR no. 461/2003 Coll. on social insurance , as amended, by the Act of the NR SR                                                                               no. 563/2009 Coll. on tax administration (tax code), as amended, Act no. 40/1964 Coll. Civil Code, 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, Act no. 311/2001 Coll., Act NR SR no. 461/2003 Coll. on social insurance, as amended, Act NR SR no. 43/2004 Coll. on old-age pension savings and on amendments and additions to certain laws, as amended, Act of the NR SR no. 580/2004 Coll. on health insurance on amendments and additions to Act NR SR no. 95/2002 Coll. on the insurance industry and on the amendment of certain laws, as amended, Act                                                                                                   no. 311/2001 Coll. Labor Code as amended, Act No. 283/2002 Coll. on travel reimbursements as amended. |
| Categories of beneficiaries | - bodies of state administration, public power and public administration according to relevant legal regulations  - intermediary |
| Cross-border transfer of persons. data | It's not happening |
| Deadlines for deleting os. data | 10 years |
| Information about the existence of automated decision-making, including profiling | It's not happening |
| **3 KEEPING RECORDS OF CLIENTS** | |
| The purpose of personal data processing | The purpose of processing personal data is to keep records of the company's clients who purchased a product or photo service on the company's website or in brick-and-mortar stores. |
| Information system name | IS Keeping records of clients |
| Legal basis | concluded distance sales contract between the operator and the affected person, familiarization with the general terms and conditions . |
| Categories of beneficiaries | - bodies of state administration, public power and public administration according to relevant legal regulations |
| Cross-border transfer of persons. data | It's not happening |
| Deadlines for deleting os. data | 10 years |
| Information about the existence of automated decision-making, including profiling | It's not happening |
| **4 PROCESSING OF PHOTOGRAPHS OF EMPLOYEES** | |
| The purpose of personal data processing | Promotion of the operator, publication of photos of employees about organized events, activities of the operator with the intention of building its good name . |
| Information system name | IS Processing of employee photos |
| Legal basis | The consent of the person concerned pursuant to Article 6, paragraph 1 letter a) Regulations and the Act on the Protection of Personal Data, while the person concerned has the right to withdraw his consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal. |
| Categories of beneficiaries | They are not. |
| Cross-border transfer of persons. data | It's not happening |
| Deadlines for deleting os. data | 3 years |
| Information about the existence of automated decision-making, including profiling | It's not happening |
| **5 CAMERA SYSTEM MONITORING PREMISES ACCESSIBLE TO THE PUBLIC** | |
| The purpose of personal data processing | Monitoring of premises accessible to the public for the protection of the operator's property and health . |
| Information system name | IS Camera system monitoring spaces accessible to the public |
| Legal basis | Legitimate interest in the sense of Article 6 par. 1 letter f) Regulations. The main legitimate interest is the protection of the property and safety of the operator and the affected persons |
| Categories of beneficiaries | Public authorities according to relevant legal regulations |
| Cross-border transfer of persons. data | It's not happening |
| Deadlines for deleting os. data | 15 days from the day following the day on which the recording from the camera system was created |
| Information about the existence of automated decision-making, including profiling | It's not happening |
| **6 REGISTRY MANAGEMENT, RECORDS OF RECEIVED AND SENT MAIL** | |
| The purpose of personal data processing | Ensuring the administration of the registry as a proper record of records (keeping complete and accurate records of records in the registry diary, maintaining registers and indexes of records), proper disposal of files (records), ensuring planned disposal of files (records) that are not needed for further activity and deadlines have passed their storage, record of incoming and outgoing mail, record of electronic mail. |
| Information system name | IS Registry management, records of received and sent mail |
| Legal basis | Act of the NR SR no. 395/2002 Coll. about archives and registries. |
| Categories of beneficiaries | - bodies of state administration, public power and public administration according to relevant legal regulations |
| Cross-border transfer of persons. data | It's not happening |
| Deadlines for deleting os. data | 10 years |
| Information about the existence of automated decision-making, including profiling | It's not happening |
| **7 NOTIFICATION OF ANTI-SOCIAL ACTIVITY** | |
| The purpose of personal data processing | Investigation of complaints according to Act NR SR no. 307/2014 Coll. on some measures related to the reporting of anti-social activity and on amendments to some laws. |
| Information system name | IS Notification of anti-social activity |
| Legal basis | Act of the NR SR no. 307/2014 Coll. on some measures related to the reporting of anti-social activity and on the amendment of some laws. |
| Categories of beneficiaries | - intermediary (parent company) |
| Cross-border transfer of persons. data | It's not happening |
| Deadlines for deleting os. data | 3 years |
| Information about the existence of automated decision-making, including profiling | It's not happening |
| **8 HANDLING OF CLAIMS** | |
| The purpose of personal data processing | Ensuring the application of the right from liability for defects in goods or services provided by the customer, who is required to have a certain remedy or compensation for faulty performance, or non-fulfilment. It follows from the above that the purpose is to ensure the functioning of legal relations between the operator and the person concerned, when dealing with complaints regarding the correctness and quality of goods and services provided by the operator. |
| Information system name | IS Claim handling |
| Legal basis | Law no. 40/1964 Coll. Civil Code as amended, Act No. 513/1991 Coll. Commercial Code, as amended, Act No. 250/2007 Coll., Act on Consumer Protection and Amendment of Slovak National Council Act No. 372/1990 Coll. on offenses as amended . |
| Categories of beneficiaries | - bodies of state administration, public power and public administration according to relevant legal regulations |
| Cross-border transfer of persons. data | It's not happening |
| Deadlines for deleting os. data | 3 years |
| Information about the existence of automated decision-making, including profiling | It's not happening |
| **9 MARKETING** | |
| The purpose of personal data processing | The purpose of the information system in question is to organize marketing campaigns, sales support, or sending newsletters to the operator's customers. |
| Information system name | IS Marketing |
| Legal basis | The consent of the person concerned pursuant to Article 6, paragraph 1 letter a) Regulations and the Act on the Protection of Personal Data, while the person concerned has the right to withdraw his consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal. |
| Categories of beneficiaries | They are not. |
| Cross-border transfer of persons. data | It's not happening |
| Deadlines for deleting os. data | 3 years |
| Information about the existence of automated decision-making, including profiling | It's not happening |
| **10 ORGANIZING COMPETITIONS** | |
| The purpose of personal data processing | The main purpose of this information system is to process the agenda for competitions organized by CEWE as on its website www.cewe.sk, but also on Facebook pages @fotolab |
| Information system name | IS Organization of competitions |
| Legal basis | The consent of the person concerned pursuant to Article 6, paragraph 1 letter a) Regulations and the Act on the Protection of Personal Data, while the person concerned has the right to withdraw his consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal. |
| Categories of beneficiaries | They are not. |
| Cross-border transfer of persons. data | It's not happening |
| Deadlines for deleting os. data | 10 years |
| Information about the existence of automated decision-making, including profiling | It's not happening. |
| **11 PUBLISHING ACTIVITY** | |
| The purpose of personal data processing | The purpose of the information system in question is to carry out the company's publishing activities - publishing a magazine |
| Information system name | IS Publishing activity |
| Legal basis | § 78 par. 2 of the Act of the NR SR no. 18/2018 Coll. on the protection of personal data and on the amendment of certain laws |
| Categories of beneficiaries | They are not. |
| Cross-border transfer of persons. data | It's not happening |
| Deadlines for deleting os. data | 5 years |
| Information about the existence of automated decision-making, including profiling | It's not happening. |
| **12 MANAGEMENT OF THE CORPORATE AGENDA** | |
| The purpose of personal data processing | Keeping records of a commercial company, keeping records of its representatives, owners, keeping records of the commercial and trade register, drawing up contracts, declarations of honor, preparing and securing authorizations, powers of attorney, licenses and permits, ensuring the payment of deposits, rewards, bonuses, etc. |
| Information system name | IS Management of the corporate agenda |
| Legal basis | Law no. 513/1991 Coll. Commercial Code as amended. |
| Categories of beneficiaries | - bodies of state administration, public power and public administration according to relevant legal regulations |
| Cross-border transfer of persons. data | It's not happening |
| Deadlines for deleting os. data | 20 years |
| Information about the existence of automated decision-making, including profiling | It's not happening. |
| **13 RECORDS OF SZČO** | |
| The purpose of personal data processing | Preparation and management of supplier-customer relations with self-employed persons. Contractual relations, invoices and orders, records of deliveries and receipts of goods, services, etc. are kept within the subject agenda. |
| Information system name | Records of SZČO |
| Legal basis | The contract between the operator and SZČO authorized by the Constitution of the Slovak Republic, the Civil Code, the Commercial Code, Act no. 455/1991 Coll., the Trade Act (Trade Act) and related legal regulations. |
| Categories of beneficiaries | bodies of state administration, public power and public administration according to relevant legal regulations |
| Cross-border transfer of persons. data | It's not happening |
| Deadlines for deleting os. data | 10 years after the end of the contractual relationship due to records in the accounting agenda |
| Information about the existence of automated decision-making, including profiling | It's not happening. |
| **14 RECORDS OF SUPPLIER AND CUSTOMER REPRESENTATIVES** | |
| The purpose of personal data processing | Maintaining a database of representatives, respectively employees of suppliers and customers for the purpose of fulfilling their work, official and functional duties and ensuring smooth supplier-customer relations. |
| Information system name | Records of representatives of suppliers and customers |
| Legal basis | § 78 from 3 of the Act of the NR SR no. 18/2018 Coll. on the protection of personal data and on the amendment of certain laws |
| Categories of beneficiaries | They are not |
| Cross-border transfer of persons. data | It's not happening |
| Deadlines for deleting os. data | Within 30 days from the date of termination of supplier-customer relations |
| Information about the existence of automated decision-making, including profiling | It's not happening. |
| **15 EXERCISE OF THE RIGHTS OF THE PERSONS CONCERNED** | |
| The purpose of personal data processing | Processing requests from natural persons aimed at exercising their rights as data subjects in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons in the processing of personal data and on the free movement of such data. |
| Information system name | IS Exercising the rights of affected persons |
| Legal basis | Art. 6 par. 1 letter c), in accordance with Art. 15 to 22 and 34 of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons in the processing of personal data and on the free movement of such data |
| Categories of beneficiaries | They are not. |
| Cross-border transfer of persons. data | It's not happening |
| Deadlines for deleting os. data | 1 year from the date of processing the application |
| Information about the existence of automated decision-making, including profiling | It's not happening. |
| **16 LOYALTY PROGRAM AGENDA PROCESSING** | |
| The purpose of personal data processing | The purpose of the information system in question is to process the agenda of the loyalty program of clients, respectively customers of CEWE as the operator of the information system |
| Information system name | IS Loyalty program agenda processing |
| Legal basis | The consent of the person concerned pursuant to Article 6, paragraph 1 letter a) Regulations and the Act on the Protection of Personal Data, while the person concerned has the right to withdraw his consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal. |
| Categories of beneficiaries | They are not |
| Cross-border transfer of persons. data | It's not happening |
| Deadlines for deleting os. data | 3 years from the date of the last use of the benefits of the loyalty program |
| Information about the existence of automated decision-making, including profiling | It's not happening. |

\* Prices include VAT and no delivery fee according to the valid price list. [Prices and delivery dates](https://www.cewe.sk/cennik.html)

| [GTC](https://www.cewe.sk/terms.html) | [Protection of personal data](https://www.cewe.sk/oou.html) |