

■ Notice on processing of personal data

Pursuant to Article 13 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, and Act 18/2018 Coll. on the protection of personal data, and on the amendment and supplementing of certain laws, as the controller governed by a contract.

A. Identification data of controller:

Controller Exe, a.s., with registered office at Plynárenská 1, 821 09 Bratislava, Slovensko, company ID: 17321450 (hereinafter "Controller").

B. Purpose of processing personal data by Controller:

We only use your personal data where so permitted by law. We use your personal data most frequently under the following circumstances:

- **where we need to perform a contract that we plan to enter into or have entered into with you,**
- **where it is in our legitimate interests for improving our services:**

The legitimate interest of the Controller is the right to conduct business within the scope of its activities. The period for which personal data are stored is determined by the preparation and force of a commercial relationship, as well as for a period of 2 years from its cessation. Recipients of personal data are companies that provide management and support of information technologies, entities conducting an external audit, telecommunication services provider, data storage providers and in justified cases, also the courts and criminal authorities; and for the purpose of marketing or dispatching a newsletter.

A legitimate interest [Article 6 (1) f) of the Regulation] and your legitimate interest is the possibility in future to become acquainted with the latest service offers that could be more advantageous for you than existing services. The provided services change over time and we would be glad if you always had the option to choose those that best suit your needs.

- **when we need to comply with legal or regulatory obligations.**

Under certain circumstances, we can process your personal data also based on your consent. If we do this, we will notify you about the purpose and category of the personal data that are to be processed at the time when we request your consent. We process data also based on cookies.

Cookies and similar technology

We use cookies for managing the experience of our users, to store their language preferences. Cookies are small text files that are transferred from a web server to your device hard disk. Cookies can be used to acquire the date and time of your visit, browser history, your preferences and your user name. You can set your browser so that it refuses all or select cookie files or to

warn you when websites have settings or access to cookies. Please be aware that if you prohibit or refuse the use of cookies, some parts of our services/platforms may become unavailable or may not function properly.

C. List of personal data:

- Name
- Surname
- E-mail address
- Telephone number

D. Compliance

Checking compliance with the protection of personal data is ensured in our company by the Data Protection Officer, who you can contact by email: privacy@exe.sk or by writing a letter addressed to our head office: Exe, a.s., Plynárenská 1, 821 09 Bratislava, indicating: "In person to the Data Protection Officer".

E. Who do we share your data with?

Intermediaries:

We make rigorous checks of our intermediaries and request that they respect the security of your personal data and handle your data in compliance with the law. We do not allow intermediaries to use your personal data for their own purposes, and we only permit them for the processing of your personal data for specific purposes and according to our instructions.

Law enforcement authorities, regulatory bodies and others:

We may disclose your personal data to law enforcement authorities, regulatory bodies, governmental or public bodies, and other respective third parties to meet all legal or regulatory requirements.

F. Additional information:

1. Consent of the data subject for marketing activities or for acquiring data.
2. Personal data will not be provided to third parties.
3. The Controller declares that when selecting intermediaries it will take account of their professional, technical, organizational and personnel capacity and their ability to ensure the security of processed data using measures as per § 39 of Act 18/2018 Coll.
4. The Controller declares that it has adopted all measures as per § 39 of Act 18/2018 Coll. and so undertakes to protect these data against accidental or even unlawful destruction, loss, alteration, unauthorised disclosure of, or access to the data, as well as against any other inadmissible forms of processing in line with measures adopted in the Security Policy.
5. The Intermediary undertakes to process personal data only to the extent and under the terms as agreed in the authorization of the Intermediary to the processing of personal data.
6. The Controller declares that it will not provide personal data to Intermediaries other than those listed in this Notice.
7. The Controller declares that it will collate personal data to the extent necessary to achieve the stated purpose and to process these data only in compliance with the purpose for which they were collected.
8. The Controller is obliged to maintain confidentiality about the personal data it processes. The confidentiality obligation shall endure also after the personal data have been processed.

G. Rights of data subject:**Right to access**

1. The data subject shall have the right to obtain from the Controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information: (a) the purposes of the processing; (b) the categories of personal data concerned; (c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations; (d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; (e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of the processing of personal data concerning the data subject or to object to such processing; (f) the right to lodge a complaint with a supervisory authority; (g) where the personal data are not collected from the data subject, any available information as to their source; (h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
2. If personal data are transferred to a third country or international organization, the data subject has the right to be informed about appropriate safeguards as per Article 46 of the Regulation concerning transfers.
3. The Controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.
4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.

Right to rectification

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to erasure (“to be forgotten”)

1. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies: (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing; (c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2); (d) the personal data have been unlawfully processed; (e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject; (f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1).

2. Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

3. Paragraphs 1 and 2 shall not apply to the extent that processing is necessary: (a) for exercising the right of freedom of expression and information; (b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; (c) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3); (d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or (e) for the establishment, exercise or defence of legal claims.

Right to restriction of processing

1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:
 - (a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; (b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; (c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; (d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.
2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.
3. A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted.

Right to data portability

1. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where: (a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and (b) the processing is carried out by automated means.
2. In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17 of the Regulation. That right shall not apply to processing necessary for the

performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.

Right to object

1. The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.
2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.
3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.
4. At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.
5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.
6. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

Notification of third parties

The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it.

We process your personal data in compliance with obligations laid down by law or for marketing purposes. In the processing of personal data, you are the data subject, i.e. the person whose personal data is being processed. The principles of personal data protection state that your personal data will be stored safely, in line with the Security Policy of the company Exe, a.s., and only for the period necessary to fulfil the purpose of processing. Only people entrusted by the company Exe a.s. (Controller) will have access to your personal data for the purpose of processing, where they process the data at the instruction of the Controller, in compliance with the Security Policy of the Controller. Your personal data will be archived in accordance with the retention rules of the company Exe, a.s. Your personal data will be completely erased from backups as soon as possible. Personal data stored on backups serve to avoid security incidents, foremost the disruption of data accessibility as a result of a security incident. Exe, a.s. is obliged to ensure the backup of data in compliance with the security requirements of the GDPR and Act 18/2018 Coll., and the requirements of the company Microsoft.

What is the basis for processing your data?

Your personal data will be processed based on specific legal regulations and purposes as determined by the Controller.

Will your personal data be provided outside the European Union?

Yes, but only if you are a direct client of the Translation and Localization Division of the company Exe. If you provide personal data for the purpose of a translation into a language of a non-member state of the European Union, your data may be processed also outside the EU.

Are your personal data used for automated individual decision-making?

Personal data are not used for automated individual decision-making, including profiling.

How long will your personal data be stored?

The storage of personal data that we process about you is subject to Act 395/2002 Coll. on archives and registries in connection with the Filing Plan of the company Exe, a.s., which is approved.

What are your rights?

- Right to withdraw consent – in cases where we process your personal data based on your consent, you may withdraw this consent at any time. You can withdraw your consent electronically, addressed to the Data Protection Officer, in writing, by notice of consent withdrawal or in person at our company's head office. Withdrawal of consent has no effect on the lawfulness of processing personal data that we processed based on the consent.
- Right of access – you have the right to a copy of the personal data that we have available on you, as well as to information on how we use your personal data. In the majority of cases, your personal data will be provided in written hard copy form, if you do not request some other form of provision. If you have requested the electronic provision of this information, it will be provided to you electronically where technically possible. Only people entrusted by the company Exe s.r.o. (Controller) will have access to your personal data for the purpose of processing, where they process the data at the instruction of the Controller, in compliance with the Security Policy of the Controller. Your personal data will be archived in accordance with the retention rules of the company Exe s.r.o. Your data will be completely erased from the backups as soon as it is possible in line with the archiving rules.
- Right to rectification – we adopt appropriate measures to ensure the accuracy, completeness and current status of information that we have available on you. If you believe that the data we have available are inaccurate, incomplete or obsolete, do not hesitate to request us to rectify, update or supplement the information.
- Right to erasure (be forgotten) – you have the right to request that we erase your personal data, for instance, if the personal data that we acquired on you are no longer necessary in relation to the original purpose of processing. Your right must be assessed, however, from the perspective of all relevant circumstances. For example, we may have

certain legal and regulatory obligations, meaning we will not be able to accommodate your request.

- Right to restriction of processing – under certain circumstances you have the right to request us to stop using your personal data. For example, this concerns cases where you believe the personal data we have on you may be inaccurate, or if you think that we no longer need to use your personal data.
- Right to data portability – under certain circumstances, you have the right to request that we transfer your provided personal data to a third party as you choose. The right to portability, however, concerns only those personal data that we acquired from you based on consent or based on a contract in which you are one of the contractual parties.
- Right to object – you have the right to object to the processing of data that is based on our legitimate interests. In cases where we have no convincing legitimate grounds for processing and you submit an objection, we will discontinue processing your personal data.
- The right to lodge a petition to commence proceedings on the protection of personal data - if you feel that we are processing your data unfairly or unlawfully, you can file a complaint with the oversight body, namely the Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27; tel.: +421/2/32 31 32 14; e-mail: statny.dozor@pdp.gov.sk, <https://dataprotection.gov.sk>. If you are submitting an objection in electronic form, it must satisfy the particulars as per § 19 subsection 1 of Act 71/1.