

# Information capability of the operator

- Social networks -

# Information obligation of the controller



(hereinafter also referred to as the "OAU Principles")

pursuant to 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 Regulation") in accordance with

§ 19 of Act No. 18/2018 Coll. on the Protection of Personal Data (hereinafter referred to as the "Act").

## CONTROLLER:

**Business name: BizPartner Investments, j. s. a.**

Headquarters: Dlhé hony

5031/6 ID: 53 095 731

registered in ORSR OS Prešov

**Contact details of the Controller:** *contact person: Ing. Martin Fodor*

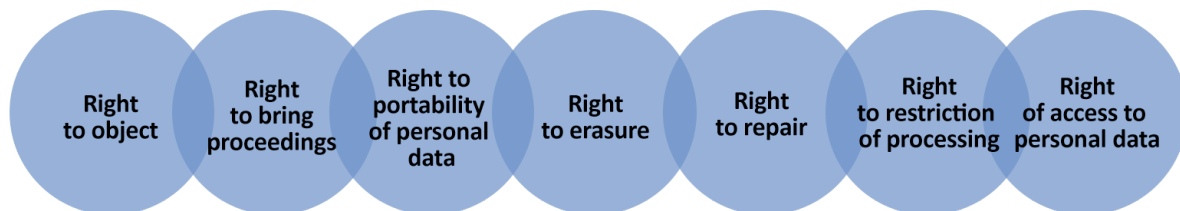


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## Rights of data subjects



*The data subject is the natural person whose personal data we process, in particular, but not exclusively, employees and clients. Such data subjects about whom personal data are processed in our information systems for specific specified purposes have rights which they can exercise in writing or electronically with the contact person of the controller. The data subject is YOU.*

### Right of access to personal data

*i.e. the right to **obtain confirmation** from a competent person **as to whether the personal data of the data subject** who has exercised his or her right is being processed, as well as the **right to obtain access to that data**. As a data subject, you have the right to access information on: the purposes of the processing, the category of personal data concerned, the range of recipients, the duration of the processing and storage, the procedure for any automated processing or the consequences of such processing, etc. (Article 15 of the Regulation). As a controller, we have the right to use all reasonable measures to verify the identity of the data subject who requests access to the data, in particular in relation to online services and identifiers. At the request of the data subject, the controller will issue a confirmation as to whether personal data are being processed*

*the data subject concerning him or her. Where the controller processes such data, it shall, upon request, issue a copy of those personal data to the data subject. The issue of the first copy shall be free of charge. For any further copies requested by the person, the controller shall charge a fee corresponding to the administrative costs incurred in issuing the copy. Where a person requests information by electronic means, it will be provided to him in a commonly used electronic form, by e-mail, unless he requests otherwise.*

### Right to restriction of processing

*can be invoked if you, as a data subject, challenge the correctness of the personal data and other particulars within the meaning of Article 18, recital 67 of the Regulation, in the form of a temporary transfer of the personal data selected to another processing system, the prevention of user access to the personal data selected or the temporary removal of the processing.*

### Right to repair

*if the controller records incorrect personal data about him or her. At the same time, the data subject shall have the right to **have incomplete personal data completed**.*

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*Operator to be executed by repair, or, in the case of incomplete personal data, without undue postponement after the person concerned has requested it*

## Right to erasure

*"forgetting" those personal data which it /affected person/ relate to. However, this right of the data subject is, due to its nature and severity, limited by the establishment of additional prerequisites, i.e. the controller shall erase the personal data without undue delay after the exercise of this right by the data subject if one of the following prerequisites is met: a) the personal data is no longer necessary for the purposes for which it was collected or otherwise processed; b) the data subject withdraws the consent on the basis of which the processing is carried out; c) the data subject objects to the processing of the personal data; d) the personal data has been processed unlawfully; (e) the reason for erasure is the fulfilment of an obligation under a law, a special regulation or an international treaty to which the Slovak Republic is bound, or (f) the personal data were collected in connection with the offer of information society services to a person under the age of 16.*

*The data subject **shall not have the right to erasure of** personal data provided that their processing is necessary: a) for the exercise of the right to freedom of expression and information; b) for the performance of an obligation under a law, a special regulation or an international treaty to which the Slovak Republic is bound, 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 field of public health; (d) for archiving purposes in the public interest, for scientific or historical research purposes or for statistical purposes, where the right to erasure is likely to render impossible or seriously impede the achievement of the purposes of such processing; or (e) for the establishment, exercise or defence of legal claims.*

*The controller shall erase the personal data of the data subjects upon request, without undue delay after it has assessed that the data subject's request is justified.*

**Right to bring proceedings** *The data subject has the right to bring proceedings before the Office for Personal Data Protection of the Slovak Republic if he or she believes that his or her rights in the area of personal data protection have been violated.*

## Right to object

*The data subject shall have the right to object at any time to processing of his or her personal data on grounds relating to his or her particular situation. He or she may object to the processing of his or her personal data on the basis of (a) the lawful performance of a task carried out in the public interest or in the exercise of official authority, or the legitimate interest of the controller; (b) the processing of personal data for direct marketing purposes; (c) processing for scientific or historical research purposes or for statistical purposes. We will consider the objection received within a reasonable time. In this case, we may not further process the personal data unless we can demonstrate compelling legitimate interests for the processing of the personal data which override the rights or interests of the data subject or grounds for exercising a legal claim.*

## Right to portability of personal data

*as the data subject, you have the right to have the personal data you have provided to the controller transferred to another controller in a commonly usable and machine-readable format, provided that the personal data have been collected on the basis of the data subject's consent or on the basis of a contract and their processing is carried out by automated means.*

## Further information:

**- The purpose of the processing of personal data** is the reason for which the controller processes the personal data of data subjects in information systems on specifically identified legal grounds. Each processing of personal data is based on a specific legal basis and for a specifically identified, legitimate and explicitly stated purpose.

- In order to protect your personal data as much as possible, we as the Data Controller have taken appropriate personal, organisational and technical measures. Our aim is to prevent or reduce the risk of leakage, misuse, disclosure or other use of your personal data as far as possible. **Should a fact occur which is likely to result in a high risk to the rights and freedoms of natural persons, you, as the data subject, will be contacted without delay (Article 34 of the Regulation).**

- In order to preserve the principles of personal data processing laid down by the Regulation as well as by law, in particular the principle of personal data minimisation, **we only request from you as the data subject personal data that is a necessary legal or contractual requirement for the fulfilment of the purpose of its processing. Please note that failure to provide the following mandatory data**

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necessary for the conclusion of the contract may  
result in the contractual relationship not being  
concluded.

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Purposes of processing, legal basis, categories of recipients, retention period, info on cross-border transmission, Categories affected information on automated decision-making including profiling distributed by individual information systems:

<b>SOCIAL NETWORKS</b>	
<b>Purpose of processing personal data</b>	- <i>the purpose is to promote (direct and indirect marketing) and offer the Company's services to social networks, communication with users, promotion of competitions and accompanying activities through social networks, providing information to the wider public</i>
<b>Legal basis</b>	<p><i>Article 6(1)(f) of the Regulation - Legitimate interest</i></p> <p><i>A legitimate interest is: the creation of an official profile of the Company on the relevant social network (fanpage). The legitimate interest is the promotion (direct and indirect marketing) and offer of the Company's services on social networks, communication with users, organizing contests and accompanying activities through social networks, providing information to the general public.</i></p>
<b>Social networks</b>	<p><i>The Operator operates the following social networking sites:</i></p> <ul style="list-style-type: none"> <li>- <i>Facebook: <a href="https://www.facebook.com/">https://www.facebook.com/</a></i></li> <li>- <i>Youtube: <a href="https://www.youtube.com/">https://www.youtube.com/</a></i></li> </ul>
<b>Categories of beneficiaries and personal data</b>	<ul style="list-style-type: none"> <li>- <i>The data you post on our social networking sites is published through the social network platform and we never process them or use them for any other purpose. However, we reserve the right to delete infringing content, such as infringing posts, hateful comments, vulgar comments (e.g. with sexual content) or attachments (e.g. images or videos) that violate copyright, intellectual property rights, criminal law or the Company's ethical principles, if necessary.</i></li> <li>- <i>We may share your content on our site if it is a feature of a social networking platform and we communicate with you through the social networking platform. The legal basis is Article 6(1)(b) of the Regulation as we are jointly party to the social networking contract and have accepted the terms and conditions of this service. In some cases, we may also enjoy a legitimate interest Article 6(1)(f) of the Regulation, which is justified by the Company's interest in developing our relationship with the public and communicating with you.</i></li> <li>- <i>In the case of data that you send us confidentially (e.g. via the private message function, by letter or email), the transfer of this personal data to a third party outside the ownership structure of BizPartner Group is excluded as a matter of principle. Exceptionally, data may be processed through intermediaries authorised by us. These are carefully selected in each individual case, regularly checked by us and contractually bound in accordance with Article 28 of the Regulation. In addition, it may be necessary to forward your complaint to our contractual partner (e.g. our supplier in the case of product-specific requests) for processing. In these cases, your complaint will be anonymised before it is forwarded in such a way that a third party cannot associate it with your person. Should it be necessary in a particular case to also pass on your personal data to a third party, we will inform you of this need in advance and ask for your consent.</i></li> </ul>

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<p><b>Time limits for erasure of axis. data</b></p>	<p>- Any personal data you have provided to us in connection with your complaint sent to us via a direct message to our social network page, will be deleted or permanently anonymised (by deleting all your identification data) by us no later than 90 days after the final reply is sent to you.</p> <p>The retention of data for 90 days after the final response is sent reflects the fact that there may be rare occasions when you will contact us again on the same matter after receiving a response, and it will be necessary for us to be able to follow up on previous communications.</p> <p>We do not manage or maintain all social networking functionality and therefore, for example, all posts posted on our social networking site will remain on your timeline indefinitely unless we remove them for updating the underlying topics, or because they are in violation of the law or our guidelines, or unless you remove the post yourself.</p> <p>We cannot influence the deletion of your data by the social network operator itself.</p> <p>In addition, the privacy policy of the relevant social network operator shall therefore also apply.</p> <p><i>Lehotu Retention v in the case of Youtube Please see at <a href="https://www.youtube.com/legal/privacypolicy">https://www.youtube.com/legal/privacypolicy</a></i></p>
<p><b>Categories of data subjects</b></p>	<p>-Registered logged-in users, registered non-logged-in users and unregistered Users of</p>
<p><b>Social network platform operator</b></p>	<p>- In addition to us, the operator of the relevant platform is also an independent operator social network. In some cases, it also acts as an agent for us in accordance with Article 28 of the Regulation in order to provide us with the administration and operation of our account on the relevant social network. We remind you that the operator of the social network is also an independent controller carrying out the processing of personal data, over which we have only limited influence, but whose terms you accepted when you registered for the social network in question. In cases where we can influence and determine the conditions of the processing of personal data, we endeavour, within the limits of the possibilities provided to us by the social network operator, to ensure that the processing of personal data is carried out in accordance with the relevant legislation.</p> <p>- As mentioned above, where the social network platform provider has allowed us to do so, we ensure that our social networking sites are privacy compliant. Therefore, in particular, we do not define target groups for advertising purposes on the basis of demographic, interest parameters or location information, even if the social network provider has made such data available to us. We can only influence the statistics provided to us by the operator of the social network platform to a limited extent, but we cannot turn them off. However, we make sure that no additional optional statistics are provided to us.</p>
<p>Information about the existence of automated decision-making, including profiling - <b>Not applicable</b></p>	
<p><b>Cross-border transmission of axes. Data</b> - Facebook Social Media OU is processed by Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook") as described in the policy Facebook at <a href="https://www.facebook.com/policy">https://www.facebook.com/policy</a>. The company would like to point out that in this case, users' data may also be processed outside the European Union</p>	