

PRIVACY POLICY

The right to the protection of personal data, which is an integral part of basic human rights and freedoms according to the Constitution of the Slovak Republic, is reflected in our procedures and the measures which we apply in the position of controller in the processing of personal data.

In particular, the Privacy Policy (hereinafter referred to as the "Policy") will provide you with information on how we handle your personal data and how you can contact us if necessary.

When processing personal data, we proceed in accordance with 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 repealing Directive 95/46/EC (General Data Protection Regulation), Act no. 18/2018 Coll. on Personal Data Protection and on Amendments to Certain Acts (hereinafter referred to as the "Personal Data Protection Act") and other generally binding legal regulations.

In connection with the processing of personal data, we have prepared personal data protection information for natural persons (hereinafter referred to as the "data subject") whose personal data we process in connection with the provision of our services pursuant to Articles 13 and 14 of the General Data Protection Regulation.

1) CONTROLLER

FOR Clean, a.s., was founded in 1999 in Piešťany, in southwestern Slovakia. We are a medium-sized manufacturing company with many years of experience and specialization in **the processing of thin sheets**, and use our own know-how in the implementation – development and design proposal, modern technological equipment and extensive experience of the working team.

2) PROCESSING OF PERSONAL DATA

The processing of personal data is carried out in accordance with several generally binding legal regulations governing the protection of personal data. The key regulations are, in particular, the General Data Protection Regulation and the Personal Data Protection Act.

The processing of personal data by FOR Clean, a.s., is also carried out on the basis of special regulations which further regulate the conditions of processing, in particular on the basis of:

- Act no. 513/1991 Coll. Commercial Code, as amended,
- Act no. 40/1964 Coll. Civil Code, as amended

3) PROTECTION OFFICER

The protection officer responsible for the protection of personal data processed by FOR Clean, a.s., will answer any questions regarding the processing of your personal data. You can contact the protection officer responsible via the following contact details:

- e-mail: zodpovednaosoba@forclean.sk,
- Head office address: FOR Clean, a.s., Vrbovská cesta 39, Piešťany 921 01, ID No.: 36 234 923.

In case of a written request sent to the head office address of FOR Clean, a.s., please place on the letter envelope this text: "GDPR – protection officer/ GDPR – zodpovedná osoba".

4) IDENTIFICATION AND CONTACT DATA OF THE CONTROLLER:

Personal data of data subjects are processed by the controller:

FOR Clean, a.s.

Vrbovská cesta 39, 921 01 Piešťany

ID No.: 36 234 923

(hereinafter also referred to as "FOR Clean, a.s." or "controller" or "we")

Your personal data are collected and further processed by FOR Clean, a.s., (controller), who is responsible for the accuracy and legality of the processing. You, as the data subject, can exercise the rights set out below against FOR Clean, a.s.

FOR Clean, a.s., is in the position of controller, except in cases where it processes personal data on the basis of instructions from other controllers and on their behalf, when it acquires the status of an intermediary.

5) PERSONAL DATA WE PROCESS ABOUT YOU

FOR Clean, a.s., processes only such personal data on the basis of which we can make sure and provide you with professional services with expert care, while the scope of these personal data is determined in accordance with the purposes of personal data processing.

FOR Clean, a.s., processes personal data by automated and non-automated processing resources. Automated processing of personal data is carried out through dedicated secured devices.

FOR Clean, a.s., declares that access to personal data is permitted only for persons explicitly authorized and informed.

FOR Clean, a.s., ensures the protection of personal data against damage, destruction, loss, alteration, unwarranted interference and access, provision or disclosure and against any other unacceptable methods of processing. In connection with such security, appropriate technical and organizational measures have been taken corresponding to the way personal data are processed.

Nature of the Personal Data Provided

If the legal ground for the processing of personal data is a contract, the provision of personal data is a contractual requirement. The data subject is obliged to provide personal data; in the absence of such information, it is not possible to enter into a contractual relationship.

If the legal ground for the processing of personal data is a law, the provision of personal data is a legal requirement. The data subject is obliged to provide personal data, otherwise, it is not possible to properly fulfil the obligations of the controller arising from the relevant generally binding legal regulations.

If the legal ground for the processing of personal data is a legitimate interest pursued by the controller or a third party, the purpose of the processing is to determine the legitimate interest involved.

The personal data we process are in particular:

- identification and contact data, which means title, name and surname, address of permanent residence, address for delivery of consignments, contact telephone number, e-mail address, bank details; your identification data are a part of the concluded contract, which you conclude with us in accordance with the trade terms,
- transaction data, which means data on received and sent payments,

- data from communication and interaction, which means, e.g., data from the use of the web application, data from business communications or data from mutual contacts through the relevant contact points.

6) PURPOSES AND LEGAL GROUNDS FOR PROCESSING OF PERSONAL DATA

We process your personal data to the necessary extent, and most processing activities are justified by the fact that these personal data are needed to provide the required services or are related to the provision of our services.

We process your personal data for the following purposes:

a) **Asserting or Defending Our Legal Claims**

In some cases, we are forced to go to court to exercise our rights and legally protected interests, or we may be required to participate in litigation to protect our rights and legally protected interests. Claims arising from non-fulfilment of contractual obligations are most often enforced. The retention period of personal data for this purpose of processing is 10 years from the final decision of the court or other public authority.

b) **Accounting**

FOR Clean, a.s., as a regulated entity, is subject to tax and accounting obligations arising from legal regulations. In order to fulfil these obligations towards regulators, we process your personal data. The storage period is 10 years following the year to which the payments related to the user relate.

c) **Execution of Requests from the Data Subject**

In order that we can respond to your request, we need you to identify yourself. We keep the request from the data subject for a period of 5 years following the year in which the request was processed.

d) **Internal Administrative Purposes within the Group of Companies**

The internal administrative purposes of personal data processing include the transfer and use of personal data within the group of BLOCK companies (the parent company is **BLOCK**, s.r.o., U Kasáren 727,757 01 Valašské Meziříčí, Czech Republic). The legal ground for the processing of personal data is a legitimate interest monitored by the controller in accordance with Art. 6 (1) point (f) of the Regulations based on the fact that the controller is part of a group of undertakings linked to the leading undertaking. The legitimate interests are aimed at, for example, streamlining processes in the group, cost savings and improving mutual information and cooperation within the group of BLOCK companies. Personal data will be provided to the following recipients: companies forming the BLOCK group, companies providing management and support of information technologies, and entities to which the provision of personal data results from the controller is compatible with the law. The storage period for personal data is determined by the duration of the controller's membership in the BLOCK group.

e) **Business Agenda Management**

The purpose of processing personal data in the area of business communication (contact personal data of employees and co-workers of contractual partners) is the preparation and implementation of business activities of the controller. The legal ground for the processing of personal data is a legitimate interest monitored by the controller in accordance with Art. 6 (1) point (f) of the Regulations. The controller has a legitimate interest in processing the personal data of data subjects acting on behalf of its contractual partners (in practice, in particular suppliers and customers of goods and services and their contractual partners), to ensure the valid conclusion of contracts (i.e. concluding a contract with persons authorized to act on behalf of a company which is a contractual partner), its proper and effective implementation (in practice, in particular, communication with the relevant staff on the part of the controller's contractual partner). The data are stated directly in orders, contracts or obtained in connection with the performance of business contracts. The storage period for personal data is determined by the preparation and duration of the business relationship, as well as the period of 5 years from the end of the business communication. The recipients of the personal data are the business partners of the

controller, suppliers, customers, entities to which the controller provides personal data ex lege, clients. FOR Clean, a.s., processes personal data also on the basis of a legitimate interest. In this case, FOR Clean, a.s., takes steps to ensure that the impact on your privacy is kept to a minimum and that the processing does not upset the balance between the legitimate interests of the FOR Clean, a.s. company and your privacy.

7) AUTOMATED INDIVIDUAL DECISION-MAKING, INCLUDING PROFILING

The controller also processes the personal data of the data subject by automated means of processing, but the result is not decisions which would have legal effects on the data subject or which would similarly significantly affect him/her. Personal data will not be used for automated individual decision-making, including profiling in accordance with Art. 22 of the General Data Protection Regulation.

8) PRIVACY POLICY

Your personal data are processed by automated and non-automated means of processing within information systems, which are protected and secured in accordance with the relevant security standards and legislation dealing with the protection of personal data.

Within the personnel structure of FOR Clean, a.s., only persons authorized by the controller who have been duly acquainted with the controller's instructions and instructed in the possible consequences of non-compliance with these instructions, are authorized to handle personal data.

FOR Clean, a.s., declares that it respects the principle of minimizing personal data and processes only such personal data as are needed to achieve the purpose of the processing. Personal data are processed for pre-defined purposes and are not processed for any other purpose.

When processing personal data, FOR Clean, a.s., proceeds in accordance with the internal privacy policy and security of information systems. FOR Clean, a.s., assesses and continuously evaluates whether the processing of personal data would pose a high risk to the data subjects and interfere with their privacy in a disproportionate manner. Based on this observation, a detailed assessment of the risks and the impact on the privacy of the data subjects is carried out, the outcome of which is taken into account when setting up and implementing the controller's procedures.

In order to secure personal data against unauthorized or accidental disclosure to a third party, we use adequate and appropriate technical and organizational measures. Technical measures consist in the application of technologies that prevent unauthorized access by third parties to personal data. For the purpose of maximum protection, the encryption of personal data and passwords to gain access to the internal systems of FOR Clean, a.s., is used, resp. access to personal data stored on servers of FOR Clean, a.s. Organizational measures form a set of rules of conduct for our employees, which are incorporated into the internal regulations of the controller. The internal regulations of FOR Clean, a.s., are considered confidential.

9) RECIPIENTS OF PERSONAL DATA

In exceptional cases, your personal data may be provided to third parties, especially if such a procedure is permitted by the applicable law.

Suppliers and Business Partners

Some processing activities are also performed through our suppliers. When selecting suppliers, we pay particular attention to their professional, technical, organizational and personnel competence so as to guarantee the security of the personal data processed.

Our suppliers and business partners include, but are not limited to:

- server service providers,
- accounting and legal service providers,
- BLOCK Group companies.

Supervisory Authorities

In connection with the performance of control or supervision, your personal data may be provided to bodies that legally control the performance of our activities, e.g. the Office for Personal Data Protection of the Slovak Republic, the Slovak Trade Inspection, and others.

Claims Enforcement and Application of Rights:

In connection with the enforcement of our rights and legally protected interests in justified cases, we provide your personal data to the relevant courts, executors, notaries, law firms, certified experts, or other external entities that deal with claims enforcement or the application of rights.

Public Authorities:

Based on special legal regulations, we provide personal data to certain entities to which we are obliged to provide such data on the basis of their request for cooperation, e.g. state administration authorities, courts, prosecutor's offices, law enforcement authorities or the Financial Administration of the Slovak Republic.

Other Authorities, Institutions and Entities:

Social insurance and health insurance institutions, audit companies, and others.

10) STORAGE PERIOD OF PERSONAL DATA

We store and protect your personal data for the period specified by the applicable law. If we store your personal data on the basis of your consent, we do so for the period for which you have given us your consent. Storage periods for personal data vary depending on the specific purpose for which the personal data are processed. The set storage period for personal data is based on the principle of minimizing the storage of personal data.

11) RIGHTS OF DATA SUBJECTS

As the data subject, you have the following rights:

The Right of Access to Data Pursuant to Art. 15 of the General Data Protection Regulation

You have the right to obtain information from us on whether we process your personal data. If we process your personal data, you have the right to access such personal data to the following extent: purpose of the processing, category of personal data, recipients of the personal data, duration of processing the personal data and information on the source from which we obtained your personal data. You also have the right to provide a copy of your personal data, but you must explicitly state this in your request. Should you request additional copies, we have the right to charge a reasonable fee for that service for making additional copies. However, the rights of third parties, including other persons who have provided personal data to FOR Clean, a.s., cannot be restricted by this and FOR Clean, a.s., cannot make foreign personal data available to you in this way.

The Right to Rectification or Completion Pursuant to Art. 16 of the General Data Protection Regulation

You have the right to request the rectification of incorrect personal data or the completion of incomplete personal data that we process about you. By using this right, you will help to keep your personal data correct and up-to-date.

The Right to Erasure (the right to be "forgotten") under Art. 17 of the General Data Protection Regulation

You have the right to request that your personal data be erased without undue delay if one of the following reasons is fulfilled:

- a) The personal data are no longer needed for the purposes for which they were obtained or otherwise processed,
- b) The data subject shall withdraw their consent pursuant to Article 6 (1) point (a) or revoke their express consent pursuant to Article 9 (2) point (a) of the General Data Protection Regulation, and there is no other legal basis for processing,
- c) The data subject objects to the processing under Article 21 (1) of the General Data Protection Regulation (objection to a legitimate or public interest), if there are no legitimate grounds for processing, or if the data subject objects to the processing under Article 21 (2) of the General Data Protection Regulation (objection to direct marketing),
- d) The personal data were processed illegally,
- e) The personal data must be erased in order to comply with a legal obligation under Union law or the law of the Member State to which FOR Clean, a.s., is subject,
- f) The personal data were obtained in connection with the offer of information society services pursuant to Article 8 (1) of the General Data Protection Regulation (child's consent).

FOR Clean, a.s., has no obligation to erase your personal data in the case of processing:

- a) to exercise the right to freedom of expression and information,
- b) to fulfil a legal obligation requiring processing under Union law or the law of the Member State to which FOR Clean, a.s., is subject, or to fulfil a task carried out in the public interest or in the exercise of public authority conferred on FOR Clean, a.s.,
- c) for reasons of public interest in the field of public health in accordance with Article 9 (2) points (h) and (i), as well as Article 9 (3) of the General Data Protection Regulation,
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89 (1) of the General Data Protection Regulation, in so far as the law referred to in paragraph 1 is likely to make it impossible or very difficult to achieve the objectives of such processing, or
- e) to prove, apply or defend legal claims.

The Right to Restriction of Processing under Art. 18 of the General Data Protection Regulation

You have the right to request the blocking of your personal data (restriction of the processing of your personal data to their storage; other processing operations during the blocking are not allowed) in these cases:

- a) Restriction on the processing of your personal data at the time of verifying its accuracy,
- b) If your personal data are processed illegally and at the same time you require, instead of erasure of your personal data, only a restriction of their processing (storage only),
- c) You need your personal data to prove, apply or defend legal claims,
- d) You object to the processing under Article 21 (1) of the General Data Protection Regulation (legitimate interest or public interest), until it is verified that the legitimate reasons on the part of FOR Clean, a.s., override your legitimate interests.

In the event that the processing of personal data is restricted, FOR Clean, a.s., may only store or process personal data:

- a) for the purpose of proving, applying or defending legal claims,
- b) to protect the rights of another natural or legal person,
- c) for reasons of important public interest of the Union or a Member State,
- d) with the consent of the data subject.

Should a situation arise which would lead to the lifting of the restriction on the processing of personal data, FOR Clean, a.s., shall inform the data subject in advance.

The Right to Data Portability According to Art. 20 of the General Data Protection Regulation

You have the right to obtain personal data that you have provided to us in a structured, commonly used

and machine-readable format. You have the right to ask us to transmit your personal data from FOR Clean, a.s., to another controller that you specify in your request, provided that this is technically feasible.

The right to personal data portability shall apply in cases where:

- a) the processing is based on the legal ground of a consent or a contract,
- b) the processing is performed by automated means.

The Right to Object Pursuant to Art. 21 of the General Data Protection Regulation

You have the right to object at any time to the processing of your personal data if the legal ground for the processing of personal data is a legitimate interest within the meaning of Article 6 (1) point (f) of the General Data Protection Regulation, by sending a written request to the e-mail address: zodpovednaosoba@forclean.sk, by post or by handing in a written request at the FOR Clean, a.s., head office.

Upon receipt of the objection, we will delete your personal data, except in the following cases:

- a) If FOR Clean, a.s., proves the necessary legitimate reasons for the processing which override your interests, rights and freedoms or
- b) If it is proven that FOR Clean, a.s., needs your personal data to prove, apply or defend legal claims;

Your objections do not affect the processing of your personal data before the delivery of your objections.

Automated Individual Decision-making, Including Profiling According to Art. 22 of the General Data Protection Regulation

You have the right not to be subject to a decision which is based solely on automated processing, including profiling, and which produces legal effects concerning you or similarly significantly affecting you.

That right shall not apply if the decision is:

- a) Necessary for the conclusion or performance of a contract between the person concerned and FOR Clean, a.s.,
- b) Permitted by Union law or by the law of the Member State to which FOR Clean, a.s., is subject and which also lays down appropriate measures guaranteeing the protection of the rights and freedoms and legitimate interests of the data subject,
- c) Based on the explicit consent of the data subject.

The provision of our services does not involve automated individual decision-making in accordance with the General Data Protection Regulation.

The Right to Lodge a Complaint with a Supervisory Authority Pursuant to Art. 77 of the General Data Protection Regulation

If you consider that your rights to personal data or the processing of your data have been infringed, you have the right to lodge a complaint with the supervisory authority, which is:

Office for Personal Data Protection of the Slovak Republic
Hraničná 4826/12
820 07 Bratislava 27

Tel.: +421 2 3231 3214

e-mail: statny.dozor@pdp.gov.sk

Exercising Your Rights According to Art. 12 of the General Data Protection Regulation

FOR Clean, a.s., provides information concerning the processing of personal data only at the request of the data subject in the exercise of his/her rights, provided that he or she is demonstrably able to identify the data subject. Without successful verification of your identity, FOR Clean, a.s., is not obliged to provide any information regarding the processing of personal data. FOR Clean, a.s., hereby prevents unauthorized access

to your personal data and infringement of your rights by an unauthorized person.

You can exercise your rights to personal data in the following ways:

- a) in person at the FOR Clean, a.s., head office,
- b) by post,
- c) by e-mail sent to: zodpovednaosoba@forclean.sk.

You can also submit a completed and signed request in person directly to our filing office at the FOR Clean, a.s., head office. The request shall contain all the necessary information and supplements necessary to process it and assess your claims regarding the processing of personal data. In the event that your request is incomplete, we will contact you to complete the request.

12) FINAL PROVISIONS

FOR Clean, a.s., reserves the right to update this information obligation in any way, in particular in connection with changes in legislative processes. The current version will always be available on the website: www.rukahore.sk and other websites operated by the controller. In the event of a substantial change in the privacy policy, in particular the method of personal data processing, FOR Clean, a.s., will fulfil its information obligation by visibly publishing a notice before implementing the changes.

With these principles of data protection we wish to assure you that we treat personal data with the utmost care and respect, in accordance with the applicable law and using the available level of technical protection. For any questions about the privacy policy that are not answered in this document, please write to: zodpovednaosoba@forclean.sk.

In Piešťany on 1 September 2019