

INFORMATION ON THE PROCESSING OF PERSONAL DATA

[under which the controller informs data subjects about the processing of their personal data]

CONTROLLER:

detect s. r. o.

with registered office at: Wolkrova 19, 851 01 Bratislava

Company ID No.: 43 869 319

company registered in the Business Register of the Bratislava III City Court, Section: Sro, Insert No.: 49633/B

(hereinafter referred to as “**Controller**”)

Relevant contact details of data protection officers:

The processing of personal data can be a complicated matter for the layperson. However, the Controller prides itself on transparency and the desire to inform you in a straightforward way about the processing of your personal data.

If:

- (i) you need further explanation or clarification of any of the information contained herein;
- (ii) you have any questions about the processing of personal data; or
- (iii) you would like to exercise any of your rights related to the processing of personal data by the Controller, you can contact the following data protection officer with your request:

e-mail: gdpr@detect.sk

(hereinafter referred to as the “**Data Protection Officer**”)

The request does not have a prescribed form and can be submitted to the Controller by e-mail, post, or telephone.

1. Purpose

- 1.1 The Controller hereby fulfils its information obligation towards registered applicants for its services and other natural persons (hereinafter referred to as “**Data Subjects**”) regarding the processing of their personal data (pursuant to Article 13 of Regulation

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 [referred to as the **GDPR**]).

- 1.2 As a Data Subject, you have the option to be informed about the processing of your personal data before the Controller starts processing it.
- 1.3 All current contact details of the Controller are published on its website: <https://detect.sk/>. Before entering into any relationship with the Controller, please use the option to inform yourself about the processing of your personal data.
- 1.4 The Controller's aim and commitment is to ensure that you, as Data Subjects, are informed in a straightforward way about the processing of your personal data by the Controller and that you are aware of your rights in relation to the processing of your personal data. If you, as a Data Subject, have any questions regarding the processing of your personal data, you may contact the above-mentioned Data Protection Officer, who will provide you with an answer in a concise and comprehensible manner.

2. Information about the personal data of Data Subjects processed by the Controller

- 2.1 The Controller processes the following personal data about you as Data Subjects for the following purposes and on the legal basis indicated:

Purpose	Legal basis	Categories of Data Subjects	Categories of personal data
<i>for what reason do we process your personal data?</i>	<i>on what basis do we process your personal data?</i>	<i>whose personal data do we process?</i>	<i>what personal data do we process?</i>

<p>(A) receipt and dispatch of post, record-keeping of post (including communication with public authorities)</p>	<p>compliance with the legal obligation under Article 6 (1) (c)</p> <p>fulfilment of the contract pursuant to Article 6 (1) (b) of the GDPR</p> <p>Act No. 305/2013 Coll. on E-Government, as amended, Act No. 395/2002 Coll. on Archives and Registers, as amended</p>	<p>- recipients and senders of correspondence</p>	<p>- name, surname, address;</p> <p>- correspondence address or the position or function of the recipient and sender of the correspondence;</p> <p>- or other necessary personal data required for this purpose.</p>
<p>Note (explanation):</p> <p>For the purposes of communicating with you, we process your personal data necessary to send you correspondence by letter or electronic mail. To fulfil our obligations towards public authorities, we also communicate with natural persons who are representatives of these authorities.</p>			

<p>(B) communication with business partners and contact persons of business partners</p>	<p>legitimate interest pursuant to Article 6 (1) (f) of the GDPR</p> <p>fulfilment of the contract</p>	<p>- business partners</p> <p>- employees or associates of business partners (e.g. sales representatives)</p>	<p>- name, surname;</p> <p>- position, function, or role within contractual relationships with business partners;</p>
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pursuant to Article 6 (1) (b) of the GDPR	<ul style="list-style-type: none"> - natural persons who enter into the relevant contract - persons responsible for individual parts of the contract - natural persons acting on behalf of legal entities - contact persons of business partners 	<ul style="list-style-type: none"> - contact details (e-mail, phone number, etc.); - or other necessary personal data required for this purpose.
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Note (explanation):

Our business partners are natural persons as well as legal entities, with whom we communicate through their employees or representatives – referred to as contact persons. We also communicate with our business partners through their other representatives or agents (e.g. statutory or sales representatives, etc.). When entering into contracts, we negotiate and communicate with the persons or entities entering into these contracts or process personal data of persons responsible for a certain part of the contractual relationship.

(C) Sending newsletters	legitimate interest pursuant to Article 6 (1) (f) of the GDPR	<ul style="list-style-type: none"> - current and former customers 	<ul style="list-style-type: none"> - identifying information such as name and surname and e-mail address.
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Note (explanation):

To provide information about our services, we send our current and former customers or business partners a newsletter in which we inform them about news from our areas of expertise.

(D) Organising contests	consent of the Data Subject pursuant to Article 6 (1) (a) of the GDPR	<ul style="list-style-type: none"> - natural persons who learn about the contest 	<ul style="list-style-type: none"> - identifying information such as name and surname or e-mail address, or address or other details for handing over the prize; - communication with the contestant.
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Note (explanation):

To promote our company, we may organise contests from time to time that you can enter and compete for prizes.

(E) marketing of the Controller on social networks	legitimate interest pursuant to Article 6 (1) (f) of the GDPR (marketing)	<ul style="list-style-type: none"> - social network users and the public (followers of the Controller on social networks, or persons who view the Controller’s accounts or profiles on social networks or interact with the Controller) 	<ul style="list-style-type: none"> - name and surname, nickname; - photo posted by a user in their profile; - the fact that you are a follower of ours on the relevant social network; - content added by you, including expressions of a personal nature, such as your social network activities on the Controller’s website, such as “likes” or comments on our posts, the content of private messages addressed to the Controller, etc.
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Note (explanation):

(promotion of the Controller and its activities on social networks, communication, private communication with users of social networks, provision of information about the Controller’s services)

We promote our business on social media by providing information about our services, but also by reaching out to potential customers through our posts. If you contact us with a question about our services, we may process the content of our mutual communication.

In this regard, please note that you can partially modify, restrict, or exclude the processing of your personal data in the settings of the respective social network by, for example, restricting the data about you that is public. Please also note that, despite our shared responsibility with social networking companies, we do not have full control over the terms and conditions and data processing practices of social networking companies, such as the functional settings of our profile as well as your profile, the privacy settings of your profile or the content you create. To this end, we recommend that you consider the use of each social networking site and read its terms of use before using it.

(F) analysis of the behaviour of the Data Subjects on the website of the Controller using cookies	consent of the Data Subject pursuant to Article 6 (1) (a) of the GDPR	- natural persons browsing our website	- Depending on the type of cookies you agree to save.
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Note (explanation):

We use cookies to improve the functionality of our website and the presentation of our services by analysing the traffic of visitors. For more information about cookies, please refer to Article 6 hereof and our website.

(G) compliance with statutory tax and accounting obligations	compliance with the statutory obligation under Article 6 (1) (c) of the GDPR special laws (in particular the Income Tax Act, the VAT Act, the Accounting Act, etc.)	- current and former contractual partners, - employees, - external collaborators	- identifying information (in particular name, surname or business name, address of residence or place of business, or Company ID No., Tax ID No., VAT ID No.); - information on goods and services provided - data necessary for payroll processing and the fulfilment of legal obligations towards employees
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Note (explanation):

To fulfil our legal obligations in the areas of taxes and accounting (invoicing, bookkeeping, payroll, etc.), we process the personal data of our current and former business partners, employees, and external collaborators.

(H) entering into contracts with business partners and fulfilment thereof	contract between the Controller and business partner and pre-contractual relations pursuant to Article 6 (1) (b) of the GDPR	- contractual partners and clients	- identifying information (in particular name, surname, or business name, address of residence or place of business, or Company ID No., Tax ID No., VAT ID No.); - information on the services provided; - address for the delivery of goods/services; - contact information
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Note (explanation):

If you are a person to whom we provide services or we have ordered goods or services from you, we process your personal data on the basis of a contract entered into with you (or on the basis of pre-contractual negotiations).

(I) storing and sharing internal documents (e.g. contracts) and project management via cloud services and selected applications	fulfilment of contract with customers pursuant to Article 6 (1) (b) of the GDPR	- contractual partners of the Controller and their contact persons - employees and external collaborators	- identifying and contact information - internal documents such as contracts with Data Subjects - data on completed contracts - data on organisation and management
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legitimate interest pursuant to Article 6 (1) (f) of the GDPR	-	or other necessary personal data required for this purpose
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Note (explanation):

We may store documents containing your personal data or information about the fulfilment of contracts with you internally, which facilitates the provision of our services, day-to-day operations, project management, and document organisation.

(J) collecting customer satisfaction data (satisfaction questionnaire)	consent of the Data Subject pursuant to Article 6 (1) (a) of the GDPR	-	current or former customers	-	identifying information (in particular the name, surname of the customer's contact person, e-mail); - information on the services provided and their parameters; - data on satisfaction or dissatisfaction.
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Note (explanation):

From time to time, we may send our existing customers satisfaction questionnaires about the services delivered. We may send a satisfaction questionnaire to former customers after the service has been provided. For this purpose, we need to process your personal data, in particular your contact information and how satisfied you were with our services.

(K) recovery of legitimate claims	legitimate interest pursuant to Article 6 (1) (f) of the GDPR	-	current or former contractual partners; - contact persons of contractual partners	-	identifying information (in particular name, surname, or business name, address of residence or place of business, or Company ID No., Tax ID No., VAT ID No.); - identifying information of contact persons; - information on the services provided and their parameters.
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Note (explanation):

In the event of non-fulfilment of your contractual obligations, we are obliged to enforce our legitimate claims. For this purpose, it is necessary to process your personal data to the extent necessary.

(L) presentation of photographs and audiovisual recordings of events, conferences, or educational activities	- legitimate interest (direct marketing) pursuant to Article 6 (1) (f) of the GDPR	-	persons who have attended events of the Controller - persons who have attended events, which the Controller has attended	-	the likeness or vocal expression of the Data Subject.
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Note (explanation):

As part of the public presentation of the Controller, we publish photographs or videos of our events or events we have attended. We do the above for the purpose of marketing and providing information about our services.

(M) selection of new employees from applicants	fulfilment of the contract, pre-contractual relations pursuant to Article 6 (1) (b) of the GDPR;	-	job applicants	-	identifying information; - contact information; - information from the sent CV and covering letter on relevant work experience of the applicant.
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consent of the Data Subject pursuant to Article 6 (1) (a) of the GDPR

Note (explanation):

When recruiting employees, we process the personal data of job applicants to the extent necessary for the purpose of conducting the recruitment procedure. If the applicant gives us consent, we will continue to process his/her personal data after the end of the recruitment process (in case a vacancy arises).

(N) provision of help desk services fulfilment of the contract pursuant to Article 6 (1) (b) of the GDPR - customers using the help desk - data stored during the calls made.

Note (explanation):

When we provide help desk services in fulfilment of our contractual obligations, we record the calls made so that we can properly fulfil your requests.

(O) protection of the Controller's property by means of a CCTV system legitimate interest pursuant to Article 6 (1) (f) of the GDPR - employees and other persons entering the monitored premises - likeness of the Data Subject; movement of the Data Subject in certain monitored areas (corridors).

Note (explanation):

To protect our property, we monitor our premises and therefore also you if you enter them.

(P) marketing of the Controller by means of targeted campaigns on the Internet and on social networks (direct marketing) consent of the Data Subject pursuant to Article 6 (1) (a) of the GDPR by agreeing to the relevant terms and conditions and to the use of cookies of the relevant social networks or search engines (or other similar services) or in the browser of the Data Subject - social network users and the public (Internet users), - followers of the Controller on social networks, - persons interacting with the profiles of the Controller on social networks, even if they are not followers of the Controller or do not have an account on the social network - persons who, based on their profile or their behaviour on the Internet, are the target audience of the Controller's campaigns - according to the type of cookie (see the document "Information on the Processing of Personal Data"); - other data needed for the targeted campaigns.

Note (explanation):

As part of the presentation and improvement of the Controller's services, the Controller aims to ensure that its services are offered to persons who may be interested in its services. For this purpose, the Controller conducts targeted advertising campaigns on social networks or on the Internet. The Controller may use external services or have access to the functionality of social networks that analyse your behaviour as a

user. To this end, the Controller informs you that you can consent to, exclude, or restrict this processing of your data via your devices and browsers.

(R) records of meetings of the management bodies of the Controller's company	compliance with the legal obligation under Article 6 (1) (c) – Act No. 513/1991 Coll. (Commercial Code)	- shareholders	- statutory bodies	- identifying information;
		- other persons attending meetings of the management bodies	- data on the conduct of meetings.	

Note (explanation):

The Controller, pursuant to the relevant legal provisions, keeps records of the meetings of its management bodies.

2.2 If you, as a Data Subject, are interested in obtaining further details about the personal data we process about you, you may contact the Data Protection Officer with your request.

3. Categories of recipients of personal data

3.1 The Controller provides your personal data to the following categories of recipients:

- operator of postal and delivery services (purpose A);
- operator of the electronic mailbox of the Central Government Portal;
- provider of the e-mail communication service if this service is provided by a third party (purpose A, B);
- bulk e-mail service provider (C);
- social network service providers (purpose D, E, L, P);
- accounting services provider (purpose D, G, H, K, M);
- ticketing system service provider (purpose H, N);
- barrister (purpose H, K, M, O, R);
- court, bailiff (purpose K);
- third-party call storage provider (purpose H, N);
- third-party provider of personnel recruitment services (purpose M)
- external storage providers (I)
- other public authorities, if required by specific legislation.

3.2 Personal data will only be provided to the recipients to the extent necessary for the fulfilment of the given purpose.

3.3 For the sake of completeness, the Controller notes that in the case of the provision of cloud services, it acts in relation to its customers as a processor (pursuant to Article 28 of the GDPR). The legal relations with the customer are in such a case regulated in a separate processing contract, while the information obligation in relation to the Data Subjects in such a case must be fulfilled by the customer, who is the *controller* pursuant to the GDPR.

- 3.4 If you, as a Data Subject, are interested in finding out about a particular recipient and the scope of personal data provided to that recipient, you may contact the Data Protection Officer with your request.

4. Transfer of personal data to a third country

- 4.1 In general, the Controller will not transfer your personal data to a third country (outside the European Union).
- 4.2 Exceptions are providers of social networking services, search engine services and web applications and storage used by the Controller for its day-to-day business – if these are based in the USA, the transfer of personal data to the USA only takes place if the terms of use of the services are set in such a way that such providers can transfer your personal data to the USA (in particular, on the basis of the so-called standard contractual clauses). For specific information, please refer to the terms of use of the specific social network.

5. Retention period of personal data

- 5.1 Personal data that we process on the basis of a special law will be retained for the period required by the relevant special law.
- 5.2 If the processing of personal data is based on a contract, we process your personal data for the duration of the contract and, additionally, for the duration of the limitation period relating to the exercise of our last valid claim against you as the Data Subject.
- 5.3 Personal data for the purpose of communication with a business partner through a contact person is processed for the period for which the processing is necessary for this purpose (i.e. at the latest for the limitation period of claims against the business partner).
- 5.4 We process data for purposes of *public relations* on social networks as long as you allow us to do so in the social network in question. For a specific social network, you can use the settings to specify what data can be processed and for what purposes.
- 5.5 Personal data for the purpose of enforcing our legitimate claims is processed for as long as the processing is necessary for that purpose (at most for as long as these claims are time-limited).
- 5.6 We process the personal data of job applicants until the end of the recruitment procedure. If the applicant gives us consent, we will continue to process their data after the end of the recruitment procedure for an agreed period of time. If the applicant is successful and becomes our employee, we process their data subsequently on the basis of a contractual relationship or in accordance with a special law.
- 5.7 We process personal data for marketing purposes until a request to terminate processing of personal data for this purpose is sent. You are entitled to request the termination of the

processing of personal data for marketing purposes at any time by sending an e-mail to the Data Protection Officer. We also process the above personal data for a maximum period of 5 years from the last contact with you.

- 5.8 We process personal data relating to the sending of newsletters for a period of 5 years from the end of the contractual relationship with you. You are entitled to request the termination of the processing of personal data for this purpose at any time by sending an e-mail to the Data Protection Officer.
- 5.9 We process personal data for the purposes of organising contests for a maximum period of 1 year from the end of the contest. In the case of winners, we process this data for the duration of the limitation period for our claims.
- 5.10 CCTV footage is retained for 14 days, and the footage is only consulted if there is an “incident” that needs to be investigated.
- 5.11 The data from the help desk is stored for 3 months.
- 5.12 Personal data processed on the basis of consent is processed until the consent is withdrawn, or until an earlier point in time if the reason for its processing ceases to exist.
- 5.13 We store the personal data we process for the purposes of managing our services, organising our work, or managing documents for the duration of our contractual relationship with you and for a maximum time of the limitation period for our claims against you or for the period provided for by law.
- 5.14 Upon your request, we will provide you, through the Data Protection Officer, with any further information about the period for which we retain your personal data.

6. Information regarding *cookies*

- 6.1 *Cookies* are small text files that a website stores on your computer or mobile device when you browse it. Thanks to this file, the website stores information about your actions and preferences for a certain period of time, so that it does not have to re-enter them the next time you visit the site or browse its individual pages.
- 6.2 The website uses cookies for the purposes specified in the “pop-up window” displayed on the website of the Controller. Every visitor of the Controller’s website has the option to set which cookies will be saved for them.
- 6.3 You can check or delete cookies at your discretion. Details can be found at aboutcookies.org. You can delete all cookies saved on your computer or mobile device and you can set most browsers to prevent them from being saved. The steps for deleting cookies depend on the browser you are using. Below are links to the steps from the providers of the most widely used web browsers:

- a) [Google Chrome](#)
- b) [Mozilla Firefox](#)
- c) [Microsoft Internet Explorer](#)

7. Rights of the Data Subject in relation to the processing of personal data

7.1 Personal data protection regulations (in particular the GDPR) provide you as a Data Subject with a large number of rights towards the Controller. If you meet the condition for exercising a specific right, we, as the Controller, are obliged to act in such a way as to exercise your right. The conditions for exercising individual rights are not always straightforward – we aimed to describe your individual rights in a concise and easy-to-understand way in the following text. However, should you have any questions in this regard, please do not hesitate to contact the Data Protection Officer.

7.2 As a Data Subject, you have the right to obtain confirmation from the Controller as to whether personal data relating to you is being processed and, if so, to obtain access to that personal data. The specific form of access depends on (i) the type of personal data, (ii) the technical capabilities of the Controller and (iii) your technical capabilities.

[As a Data Subject, you can obtain further details and information regarding the right to access from the Data Protection Officer.]

7.3 As a Data Subject, you have the right to have the Controller rectify incorrect personal data concerning you without undue delay. With regard to the purposes of the processing, you have the right to have incomplete personal data completed.

7.4 As a Data Subject, you also have the right to have personal data concerning you erased by the Controller without undue delay. However, the right to erasure of personal data is not absolute – the Controller is obliged to erase personal data without undue delay if one of the following grounds is met: (i) the personal data is no longer necessary for the purposes for which it was collected or otherwise processed; (ii) you, as a Data Subject, withdraw the consent on the basis of which the processing is carried out and if there is no other legal basis for the processing; (iii) the personal data was processed unlawfully; (iv) the personal data must be erased in order to comply with a legal obligation.

[As a Data Subject, you can obtain further details and information regarding the exercise of the right to erasure from the Data Protection Officer.]

7.5 As a Data Subject, you have the right to have the Controller restrict processing in one of the following cases: (i) as a Data Subject, you challenge the accuracy of the personal data during a period of time that allows the Controller to verify the accuracy of the Personal Data; (ii) the processing is unlawful and as a Data Subject you object to the erasure of the personal data and request instead that the use of the personal data be restricted; (iii) the Controller no longer needs the personal data for the purposes of the processing, but you as a Data Subject need it to establish, exercise or defend legal claims; (iv) you as a Data

Subject object to the processing, pending verification that the legitimate grounds on the part of the Controller outweigh the legitimate grounds of you as a Data Subject.

The restriction is labelling the personal data stored with the objective to limit its processing in the future. If the processing is restricted, such personal data shall, with the exception of storage, be processed only with your consent or for the establishment, exercise, or defence of legal claims, or for the protection of the rights of another natural person or legal entity, or for reasons of important public interest.

[As a Data Subject, you can obtain further details and information regarding the exercise of the right to restriction of processing from the Data Protection Officer.]

- 7.6 As a Data Subject, you have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you that is carried out on the basis of the legitimate interest of the Controller or a task carried out in the public interest, including an objection to profiling. The Controller may not further process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights, and freedoms of you as the Data Subject, or grounds for establishing, exercising, or defending legal claims.

If personal data is processed for the purposes of direct marketing, you have the right as a Data Subject to object at any time to the processing of personal data concerning you for the purposes of such marketing. In this case, your personal data will no longer be processed for marketing purposes after you have objected.

[As a Data Subject, you can obtain further details, conditions and exceptions regarding the exercise of the right to object from the Data Protection Officer.]

- 7.7 As a Data Subject, you have the right to obtain the personal data concerning you that you have provided to the Controller in a structured, commonly used, and machine-readable format, and you have the right to transfer this data to another controller if the processing is based on consent or a contract and if the processing is carried out by automated means.

In the case of a request for the transfer of personal data, the technical aspects of the transfer will be discussed with you and the other controller so that the data is sufficiently protected during the transfer.

[As a Data Subject, you can obtain further details and information regarding the exercise of the right to portability from the Data Protection Officer.]

- 7.8 As a Data Subject, you have the right to lodge a complaint with the Office for Personal Data Protection if you believe that the processing of personal data concerning you is in breach of the applicable regulations. The current contact information of the Office for Personal Data Protection is available on its website: <https://dataprotection.gov.sk/uoon/>.

[As a Data Subject, you can obtain further details and information regarding the exercise of the right to lodge a complaint from the Data Protection Officer.]

7.9 Further details and information on the exercise of your rights as a Data Subject regarding the processing of your personal data can be obtained from the Data Protection Officer.

8. Further information on personal data

8.1 In some cases, the provision of personal data is a statutory or contractual requirement, or a requirement that is necessary to enter into a contract. If you do not provide us with such data, we may not be able to enter into a contractual relationship with you, or the contractual relationship with you may be terminated if the relevant statutory/contractual conditions are met. We will always inform you in advance of the need to provide specific information (and the consequences of not doing so).