

## PERSONAL DATA PROCESSING INFORMATION

**1. 9. 2022**

Please read the following information regarding personal data processing which we formulated as questions so that the information is as transparent and practical for you as possible.

### **1. WHO IS THE CONTROLLER OF YOUR PERSONAL DATA?**

The personal data controller is SYNCHRONIX, a.s., with its registered office at Mlynské nivy 71, 821 05 Bratislava, ID: 31 605 052, registered in the Commercial Register at Bratislava I District Court, section: Sa, file no. 4696/B ("SYNCHRONIX").

Please direct all questions and requests related to the processing of your personal data by SYNCHRONIX, a.s. via email to [privacy@synchronix.sk](mailto:privacy@synchronix.sk) or by writing us a letter addressed to SYNCHRONIX, a.s., Mlynské nivy 71, 821 05 Bratislava.

### **2. WHAT IS PERSONAL DATA PROCESSING AND WHAT TERMS ARE USED IN RELATION TO PROCESSING?**

At the outset, we would like to familiarise you with the basic concepts that are mentioned in this document which will help you better understand it overall. These are terms that are defined in the relevant legislation, while we try to "translate" them into a more accessible and understandable form for you:

**personal data** - any information relating to an identified or identifiable natural person, for example first name, surname, date of birth, birth number, telephone number, email address, IP address etc.,

**data subject** – natural person to whom personal data relate,

**personal data processing** – activity that the controller or a processor performs with personal data,

**controller** – natural person or legal entity that determines the purpose and means of processing personal data; the controller can entrust the processing to a processor,

**processor** – a natural person or legal entity, public authority, agency or other entity that processes personal data for the controller on their behalf,

**purpose** – the reason why the operator processes personal data,

**special categories of personal data** – sensitive personal data, which has a specific nature, such as data on health status or biometric data enabling the identification of a person,

**legitimate interest** - the interest of the controller or another entity, which necessitates the processing of personal data, if it prevails over the interests of the data subject, for example when the person concerned is a client of the controller,

**profiling** - any automatic processing of personal data that is used to evaluate specific personal conditions, for example the need to cover individual risks,

**cookies** - are small data files that are stored in a special browser cache on the user's computer and are necessary for some functions of websites, such as logging in and are often used to track user behaviour on the Internet, and their usage can be prohibited in most web browsers.

### 3. WHAT PERSONAL DATA DO WE PROCESS?

We only process personal data to ensure the smooth operation of the company with the goal of providing quality services to customers, creating an acceptable working environment for employees, complying with our statutory obligations and protecting our legitimate interests.

We aggregate the personal data of our employees, job seekers, who give us their approval to process their personal data, our external partners and the like.

We mainly process data summarised in the following categories:

#### ■ Employee data

Basic identification data of employees are part of every employment agreement that an employee concludes with us. These include, for example, first name and surname, date of birth, birth number, place of residence, identification card number (ID card including photo), citizenship, nationality, signature, marital status, details related to the work performed, details related to work experience, obtained certificates and completed training activities etc. Legislation requires in specific agendas the processing of data about an employee's family members, the employee's spouse, children and parents of children in the scope of their first name, surname, date of birth, birth number and address.

#### ■ Data from job seekers

We process identification, contact and other relevant data to determine the suitability of job seekers including their first name and surname, date of birth, place of residence, identification card number, citizenship, nationality, details related to work experience, participation in projects and professional expertise and obtained certificates. The job seeker themselves determine the scope of such data provided in their CV.

#### ■ External partner data

We only process the basic data of cooperating partners, including first name, surname, email address, phone number, signature and their employer.

#### ■ Visual recordings of employees and persons visiting company premises

These are recordings from the CCTV system from selected and adequately marked areas of the company.

#### ■ Information on the use of IT devices by company employees

This information primarily includes information from log files, in particular data on a user account

in the domain, the assigned IP address, the date of time of login and other activities on IT devices, email and Internet usage etc.

#### ■ Data from employees of vendors and customers and mail senders and addressees

We process the data of employees of vendors provided on accounting records including first name and surname, or contact details for the vendor's employee who issued the invoice, data about mail senders and addressees.

#### ■ Data about job seekers sent to the company via the controller's website.

We process the contact details of job seekers requested from the data subject via the form on the company's website.

### 4. WHY DO WE PROCESS YOUR DATA AND FOR WHAT PURPOSES?

To better understand the purposes for which we use your personal data, we have divided processing into two parts:

#### Processing that does not require your approval

##### ■ Processing under Article 6 (1)(c) GDPR - fulfilment of the controller's statutory obligations

SYNCHRONIX processes the personal data of employees to fulfil its obligations as an employer within employment, in the scope as required by relevant legislation (e.g. the Labour Code, the Health Insurance Act, the Social Insurance Act, the Income Tax Act and others). Another set of processed personal data is the data we process in a smaller scope and for which processing is required under legislation (e.g. data about the employees of vendors provided on invoices, data about mail senders and addressees etc.). These data are stored in the accounting agenda and in the registry log. We process the personal data of suitable job seekers during the hiring process. In such case, the data is processed in the scope in which it is provided by the job seeker in their CV. Precontractual relationships as defined in Article 6 (1)(b) GDPR function as the legal basis for this processing

##### ■ Processing under Article 6 (1)(f) GDPR - the controller's legitimate interest

In addition to the data required by law, we process some data that is provided directly by a person or data that is obtained in an automated manner through the use of computing equipment (e.g. IP address, date and time of login and logout, recordings from the CCTV system, list of contacts in an email address book etc) and which we process due to the legitimate interest of SYNCHRONIX.

##### ■ Processing under Article 6 (1)(b) GDPR - contractual and precontractual relationships

We process the data of persons who have expressed an interest in becoming the controller's employee based on a hiring procedure organised by the controller as a potential employer for a specific position.

### **Processing based on data subject consent - Article 6 (1)(a) GDPR**

■ Processing for this purpose permits the company to participate in public tenders. Information about the professional qualifications of employees is often required in public tenders as they function as guarantors for the tendered project or service. For such purpose, we process and provide data about an employee's previous work experience, their professional know-how and certificates. The employee themselves determines the scope of data provided when preparing various materials (the same as in the case of data provided in a CV). With the consent of data subjects, obtained certificates are also displayed in company conference rooms.

#### **■ Processing to streamline communication between employees**

Employee photographs are used in the email system and on the intranet to improve communication between employees.

**You may revoke the consent you provided to process your personal data at any time, either over the phone, via email sent to [privacy@synchronix.sk](mailto:privacy@synchronix.sk) or by writing us a letter addressed to the mailing address of SYNCHRONIX a.s.**

### **5. WHAT ARE OUR LEGITIMATE INTERESTS FOR PROCESSING PERSONAL DATA?**

The legitimate interests SYNCHRONIX uses as the legal basis for processing a specific set of personal data include:

- ensuring the protection of the property as well as the health of the employees and visitors to office areas,
- ensuring the cybersecurity of information systems,
- ensuring external partners maintain confidentiality and
- maintaining the records of users of the parking lot

### **6. WHAT ENTITIES HAVE ACCESS TO YOUR PERSONAL DATA?**

When processing your personal data, we use the services of proven and contracted external vendors which help us process and protect your personal data. These are recipients and processors which provide services to our company (accounting services, OHS services, payroll processing) and which are necessary for a portion of the processing of your personal data for the reasons specified above.

We may provide your personal data to other entities in the scope necessary in the fulfilment of our statutory obligations under the relevant legislation in the necessary scope (e.g. Social Insurance, health insurance, tax authorities, the Office of Labour, Social Affairs and Family, labour inspectorates, the Slovak Trade Inspection and others).

### **7. HOW LONG DO WE RETAIN YOUR PERSONAL DATA?**

We retain the personal data of employees for the duration of employment. Once employment, or the obligations thereunder or related thereto, is terminated, we retain employee data as required by the legislation for the period defined by law.

We retain the personal data of job seekers for a period of 6 months after the completion of the hiring process. We retain the personal data of partners for a period of 10 years after the signature of the non-disclosure agreement. We retain the personal data of mail senders and addressees pursuant to the legislative requirements in the registry system.

Personal data obtained through automated means (e.g. monitoring the use of IT devices) are retained for a maximum of 1 year. We retain the personal data in the CCTV system for 1 week.

## 8. WHAT ARE YOUR PERSONAL DATA PROCESSING RIGHTS?

You have the right to contact SYNCHRONIX and the company's designated data protection officer as well as to request information and access to the processed personal data. You have the right to be forgotten (deletion), the right to correct inaccurate or incomplete personal data, the right to restrict processing, the right to object to profiling and automatization Personal Data Processing Information decision-making and on the portability of data. You may exercise these rights using the SYNCHRONIX contacts provided below. You may also lodge a complaint with the Office for Personal Data Protection.

## 9. CONTACT PERSONS

Please share this information with others whose personal data has also been provided to SYNCHRONIX (e.g. the data of family members).

If you have any questions, comments or suggestions related to this personal data processing information, please do not hesitate to contact SYNCHRONIX by calling us on: +421 2 536 301 51, via email at: [privacy@synchronix.sk](mailto:privacy@synchronix.sk) or by writing us a letter addressed to: SYNCHRONIX a.s., Mlynské nivy 71, 821 05 Bratislava.