

as the controller of the information system published this statement in order to uphold justice and transparency towards data subjects regarding the protection of personal information under the name

### **PERSONAL DATA PROTECTION POLICY**

under art. 13 and respective recitals of the Directive of the European Parliament and of the Council (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and rules relating to the free movement of personal data (hereinafter referred to as “Directive”) and act of the National Council of the Slovak Republic no. 18/2018 Coll. on personal data protection, as amended (hereinafter referred to as “Personal Data Protection”)

The purposes of processing personal data are reasons, for which personal data of data subjects (employees, clients) are processed in our information systems under exactly defined legal bases. The purposes are specifically defined, explicitly listed and justified, whereas we act in accordance with the legality stipulation under art. 6 and 9 of the Directive when processing personal data of data subjects (individual purposes and legal bases are listed in the appendix of this Personal Data Protection Policy).

Data subjects, whose personal data are processed in our information systems for specific and delineated purposes, may exercise the following rules in written or electronic form:

- a) Right to access personal data – this is the right to obtain confirmation whether or not your personal data are processed, as well as the right to gain access to such data, to the extent of the purposes and time periods of the processing, categories of all personal data in question, circle of recipients, processing steps in every automatic processing,

potentially consequences of such processing. As a processor we have the right to use all such appropriate measures to verify the identity of the data subject, which is asking to access the data, especially in connection with online services and identification (art. 15, recital 63, 64 of the Directive).

- b) Right to correction of incorrect data and completion of incomplete personal data (art. 16, recital 65 of the Directive).
- c) Right to deletion – the “forgetting” of those personal data, which are not needed for the purposes, for which they were obtained and processed; when rescinding the consent, based on which the processing is performed; during unlawful processing; if the personal data were obtained in connection with an offer from an information company (concerning children), while meeting conditions specified in art. 17, recital 65, 66 of the Directive.
- d) Right to limit processing may be exercised, if, as a data subject, you dispute the correctness of the personal data and other requirements pursuant to art. 18, recital 67 of the Directive, in form of temporary transfer of specified personal data into a different system of processing, preventing users from accessing selected personal data or temporary removal of processing.
- e) Right to transfer personal data is the right bestowed by you that allows us to transfer personal data in our information systems to another controller based on consent or performance of a contract in a structured, commonly used and machine-readable format, if technically possible then also while adhering to the conditions of article 20, recital 68 of the Directive in cases where the processing is performed using automatized means. Article 17 of the Directive is not infringed by exercising such right. The right to transfer personal data does not apply to processing necessary for the

completion of a task performed in public interest or when exercising public authority bestowed unto us as a controller.

- f) Without any other regulatory or court means of restoration being impacted, as a data subject, you have the right to file a complaint under article 77 of the Directive with the Office for Personal Data Protection of the Slovak Republic, if you suspect, that the processing of personal data, which concerns you, is in violation of the Directive or the Personal Data Protection.

As a data subject, you also have the right at any time to object due to reasons concerning a specific situation against the processing of your personal data, as well if the processing is necessary for the purposes on the justified interests, which we observe as the controller or third party (with the exception of the processing performed by bodies of public authority during the fulfilment of their tasks), with the exception of cases, where your interests or basic rights and freedoms as a data subject supersede such interests, which require personal data protection (especially if the data subject is a child).

SANOMED s.r.o., Grösslingova 4, 811 09 Bratislava – district Staré Mesto took as a controller of an information system all necessary personal, organizational and technical measures in order to maximize protection of your personal data with the goal of preventing their abuse, disclosure etc. to the maximum extent possible. Following our obligation stemming from article 34 of the Directive we are informing you, the data subject, that if a situation occurs, in which we as the controller violate the protection of your personal data in a way, which will likely lead to a high risk to the rights and freedoms of natural persons, we shall inform you of such a situation without undue delay.

**CAUTION:** in order to comply with the policies for minimizing, all of personal data provided by you are a necessary legal or contractual requirement in order to fulfil the purpose of their

processing. Not providing such mandatory data necessary for entering into an agreement can result in not entering into a contractual relationship.

If you have any questions concerning the protection of your personal data including exercising your rights in accordance with the Directive and Personal Data Protection, please feel free to contact us or our responsible person (if specified):

Contact data:

Email address: [office@sanomed.sk](mailto:office@sanomed.sk) or phone +421 948 205 083.

Appendix to the Personal Data Protection Policy

<b>1. Personnel and remuneration agenda of employees</b>	
Purpose of processing personal data	fulfilling obligations of the employer connected with employment, civil service or similar relation (e.g. based on agreements of work performed outside of employment) including pre-contractual relations
Name of the information system	Personnel and remuneration agency of the employees
Legal basis	The Constitution of the Slovak Republic, act of the National Council of the Slovak Republic (NCSR) no. 311/2001 Coll. of the Labour Code as amended, act of the National Council of the Slovak Republic no. 552/2003 Coll. on performing work in public interest, as amended, act of the NCSR no. 321/2001 Coll. on civil service, as amended, NCSR act no. 553/2003 Coll. on remuneration of some employees when performing work in public interest, as amended, NCSR act no. 595/2003 Coll. on income tax, as amended, NCSR act no. 563/2009 Coll. on tax administration (tax policy), as amended, NCSR act no. 461/2003 Coll. on social insurance, as amended, NCSR act no. 600/2003 Coll. on child benefits, as amended, NCSR act no. 461/2003 Coll. on social insurance., as amended, NCSR act no. 462/2003 Coll. on reimbursement during temporary sick leave of the employee, as amended, NCSR

act no. 580/2004 Coll. on health insurance, as amended, NCSR act no. 650/2004 Coll. on additional retirement saving, as amended, NCSR act no. 448/2008 Coll. on social services, as amended, NCSR act no. 5/2004 Coll. on employment services, as amended, NCSR act no. 82/2005 Coll. on illegal labour and illegal employment, as amended, NCSR act no. 245/2008 Coll. on education and upbringing (School Law), as amended, NCSR act no. 18/2018 Coll. on personal data protection, as amending NCSR act no. 84/2014 Coll., NCSR act no. 317/2009 Coll. on pedagogical employees and expert employees, as amended, NCSR act no. 152/1994 Coll. on social fund and as amending NCSR act no. 286/1992 Coll. on income taxation as amended, NCSR act no. 43/2004 Coll. on elderly retirement saving, NCSR act no. 124/2006 Coll. on workplace safety, as amended. Processing of personal information is allowed under act no. 577/2004 Coll. on the scale of healthcare provision covered on the basis of public health insurance and on coverage of services connected with healthcare provision, as amended, act no. 578/2004 Coll. on provision of healthcare, healthcare workers, trade unions in healthcare, as amended, Ministry of Healthcare of the Slovak Republic bill no. 448/2007 Coll. on details concerning job factors and workplace in connection with categorization of jobs from the point of view of health risks

	<p>and on the requirements for the proposals of categorizing jobs, act no. 355/2007 Coll. on protection, support and development of public health, as amended, act no. 204/2014 Coll. amending act no. 355/2007 Coll. on protection, support and development of public health, as amended, act no. 124/2006 Coll. on workplace safety, act no. 470/2011 Coll. amending act no. 124/2006 Coll. on workplace safety amending act no. 355/2007 Coll. on protection, support and development of public health, as amended, Ministry of Health of the Slovak Republic bill on details, scope and content of performing employment healthcare service, on the composition of a team of experts performing it and on requirements on their expert qualifications.</p>
Categories of recipients	<p>Processor for processing personnel agenda, processor for processing wage agenda, processor – workplace safety technician, processor for processing workplace health service agenda, bodies of public authority pursuant to valid legal regulations, health insurance companies, additional retirement savings institutions, complementary administrative companies</p>
International data transfer	<p>Does not occur</p>
<p>Periods for deletion of personal data <i>(specified periods start after</i></p>	<ul style="list-style-type: none"> <li>- Personal employee file – includes employment letter, naming letter,... - 70 years (from birth),</li> <li>- Holiday – 3 years,</li> </ul>

<p><i>termination of employment)</i></p>	<ul style="list-style-type: none"> <li>- Attendance – 3 years,</li> <li>- Pay slips – 50 years,</li> <li>- Employee care (anniversaries, recreational,...) – 5 years,</li> <li>- Agreements (employment, part-time work) – 5 years,</li> <li>- Light injuries – 5 years,</li> <li>- Severe injuries – 5 years,</li> <li>- Workplace injury documentation concerning damage to health and reimbursement – 5 years,</li> <li>- Injury records and investigation thereof, records from investigations of severe and lethal injuries – 5 years,</li> <li>- Seminar documentation, qualification on workplace safety seminars – 5 years</li> </ul>
<p>Information regarding the existence of automated decision including profiling</p>	<p>does not occur</p>



## 2. Economics-accounting agenda

Purpose of processing personal data	The purpose of processing personal data is the processing of orders, inbound invoices and invoicing buyers, bank interaction, register, ensuring cash income and expenses, warehouse management, investment fund management (including automatic depreciation) and minor assets, management of accounting organizations
Name of the information system	Economics-accounting
Legal basis	Act no. 431/2002 Coll. on accounting, as amended, act no. 222/2004 Coll. on income tax, as amended, act no. 18/2018 Coll. on personal data protection, as amended, act 145/1995 Coll. on regulatory fees, as amended, act no. 40/1964 Coll. of the Civil Code, as amended, act no. 152/1994 Coll. on social fund amending act no. 286/1992 Coll. on income tax, as amended, act no. 311/2001 Coll. of the Labour Code, as amended, act no. 400/2009 Coll. on civil service, as amended, act no. 513/1991 Coll. of the Commercial Code, as amended, act no. 583/2004 Coll. on budgetary regulations of local authorities, as amended.
Categories of recipients	Bodies of public authority under respective legal regulations.
International data transfer	Does not occur
Periods for deletion of personal data	<ul style="list-style-type: none"> <li>- Remuneration documents – 5 years,</li> <li>- Registrations (cancellations) for health and social</li> </ul>

<i>(specified periods are in accordance with filing policy)</i>	insurance – 5 years, - Tax statements 0 5 years
Information regarding the existence of automated decision including profiling	Does not occur

<b>3. Filing management</b>	
Purpose of processing personal data	The purpose of processing of public data as part of the subject agenda is managing filing as due records-keeping (keeping due and accurate records in the filing log, keeping registries and indexes of records), due document elimination (records), ensuring planned document (records) elimination, which are not necessary for further activity and their storage periods have expired, keeping inbound and outbound mail.
Name of the information system	IS Filing Management
Legal basis	NCSR act no. 395/2002 Coll. on archiving and filing, 305/2013 Coll. on electronic form of public authority performance, as amended (e-Government law).
Categories of recipients	Public authority bodies of the respective legal regulations
International data transfer	Does not occur
Periods for deletion of personal data	Regular correspondence – 3 years

Information regarding the existence of automated decision including profiling	Does not occur
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#### 4. Self-employed persons registry

Purpose of processing personal data	The purpose of processing of personal data as part of subject agenda is preparation and management of supplier-buyer relationships with self-employed persons. As part of the subject agenda, contractual relations, invoices and orders and supply registry and goods purchase, services etc. are filed.
Name of the information system	Self-employed persons registry
Legal basis	Contract between the controller and a self-employed person allowed under the Constitution of the Slovak Republic, Civil Code, Commercial Code, act no. 455/1991 Coll., act on self-employment business (self-employment act) and related legal regulations
Categories of recipients	public authority bodies, government, public management under valid legal regulations
International data transfer	Does not occur
Periods for deletion of personal data	10 years after the conclusion of contractual relations due to filing for accounting purposes
Information regarding the	Does not occur

existence of automated decision including profiling	
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### 5. Supplier and buyer representative registry

Purpose of processing personal data	The purpose of processing personal data as part of the subject agenda is the management of representative database and employees of the suppliers and buyers in order to perform employment, service and functional obligations and ensure fluid supplier and buyer relationships.
Name of the information system	Supplier and Buyer Representative Registry
Legal basis	§ 78 art. 3 of NCSR act no. 18/2018 Coll. on personal data protection, as amended
Categories of recipients	None
International data transfer	Does not occur
Periods for deletion of personal data	Within 30 days from the day of supplier-buyer relationships conclude
Information regarding the existence of automated decision including profiling	Does not occur

### 6. Supplier and buyer representative registry

Purpose of processing personal data	The purpose of processing personal data as part of the
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data	subject agenda is handling requests of natural persons directed towards exercising their rights as data subjects in accordance with the Directive of the European Parliament and Council (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and rules relating to the free movement of personal data
Name of the information system	IS Exercising Data Subject Rights
Legal basis	art. 6 sect. 1, letter c), in accordance with art. 15-22 and 34 of the Directive of the European Parliament and Council (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and rules relating to the free movement of personal data
Categories of recipients	- State governing bodies, public authority and public governance under the respective legal regulations
International data transfer	Does not occur
Periods for deletion of personal data	1 year from processing of the request
Information regarding the existence of automated decision including profiling	Does not occur

## 7. Legal relationships

Purpose of processing personal	The purpose of processing personal data as part of the
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data	subject agenda is ensuring the management of the legal agenda (e.g. first-stage proceeding, handling repair means, court disputes, representing in legal matters, applying decisions regarding damages, levying damages, applying contractual obligations, proposing measures carrying legal and organizational impact etc.)
Name of the information system	IS Legal relationships
Legal basis	The legal basis of personal data processing is represented by act no. 460/1992 Coll. of the Constitution of the Slovak Republic, as amended, act no. 40/1964 Coll. of the Civil Code, as amended, act no. 99/1963 Coll. of the Civil Court Rule, NCSR act no. 300/2005 Coll. Criminal Code, NCSR act no. 301/2005 Coll. Criminal Procedural Law, act no. 71/1967 Processing Policy, act no. 233/1995 Coll. on court distrainers and property seizure (repossession policy), as amended, NCSR act no. 7/2005 Coll. on restructuring and bankruptcy, as amended, NCSR act no. 153/2001 Coll. on prosecution, as amended, NCSR act no. 372/1990 Coll. on offenses as valid, act no. 586/2003 Coll. on advocacy, as amended, act no. 455/1991 Coll., act on self-employment business (self-employment act), act on personal data protection and related valid legal regulations
Categories of recipients	<ul style="list-style-type: none"> <li>- Controller</li> <li>- Court bodies</li> </ul>

	<ul style="list-style-type: none"> <li>- Repossession offices</li> <li>- state governance bodies, public authority and public governance</li> </ul>
International data transfer	Does not occur
Periods for deletion of personal data	5 years from the conclusion of contractual relations
Information regarding the existence of automated decision including profiling	Does not occur

<b>8. E-shop customers</b>	
Purpose of processing personal data	<p>The controller operates the e-shop in order to provide sales services of goods/services/products to the end-user (retail).</p> <p>The basic requirement for entering into a purchase agreement is, in accordance with the general terms and conditions, sending an order of the goods/products/services via the electronic form filled in in a correct and full form.</p> <p>By sending the order, the data subject confirms that they have read the general terms and conditions, and that they are understood in full and agree to be bound by them. The controller, after receiving the electronic form, shall supply the requested goods/services/products to the purchasing party.</p>
Name of the information	IS E-shop Customers

system	
Legal basis	The legal basis for processing personal data is represented by the purchase agreement entered into remotely between the data subject and controller, which is entered into automatically after the order is sent and the order is confirmed by the controller. The seller-buyer relationships and processes are governed by the general terms and conditions determined by the controller under act no. 513/1991 Coll. Trade Code, as amended, act no. 108/2000 on consumer protection during door-to-door and remote sale, act no. 250/2007 on consumer protection
Categories of recipients	state governance bodies, public authority and public governance under the valid legal regulations
International data transfer	Does not occur
Periods for deletion of personal data	5 years from the termination of the contractual relationship
Information regarding the existence of automated decision including profiling	Does not occur