CONTROLLER'S INFORMATION OBLIGATION

Pursuant to Art. 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 (hereinafter also referred to as the "Regulation"), in accordance with Section 19 of Act No. 18/2018 Coll. on the Protection of Personal Data (the "Personal Data Protection Act")

Dear data subject,

the protection of your personal data is important to us. In this document you will find information on how we obtain, use, store and protect your personal data, as well as on the rights to which you are entitled in connection with the processing of personal data under the Regulation and the relevant legislation of the Slovak Republic.

The purpose of this personal data protection policy is to provide you with clear, transparent and complete information about the processing of your personal data by the controller. In particular, you will learn: what personal data we process, for what purposes and on what legal grounds we process it, to whom personal data may be disclosed, how long we retain personal data, what rights you have as a data subject and how you can exercise them.

When processing personal data, we observe the principles of lawfulness, fairness, transparency, data minimisation and security, so as to ensure adequate protection of your rights and privacy.

We recommend that you carefully familiarise yourself with the content of this document. Should you have any questions regarding the processing of your personal data, you may contact us at any time using the contact details provided below.

I. IDENTIFICATION OF THE CONTROLLER

Controller's name: *Revalto s.r.o.*
Company ID (IČO): *57 369 542*
Registered office: *Nová Ľubovňa 751, 065 11 Nová Ľubovňa*
Legal form: *limited liability company*
Statutory body: *Mgr. Igor Bakaľár, PhD., PhDr. Peter Vresilovič*
Contact details: *revaltosro@gmail.com*

II. INFORMATION ON THE PROCESSING OF PERSONAL DATA

IS Name	**ECONOMIC AND ACCOUNTING AGENDA**
Purpose of processing personal data	The purpose of processing personal data is the processing of orders, incoming invoices and invoicing to customers, communication with the bank, inventory management, records of fixed assets (including automatic depreciation) and low-value assets, keeping the controller's double-entry bookkeeping; records of receivables and liabilities, financial statements and fulfilment of obligations towards the relevant public authorities.
Legal basis	Art. 6(1)(c) of the Regulation: processing is necessary for compliance with a legal obligation of the controller arising from the following legislation: Act No. 431/2002 Coll. on Accounting, as amended, Act No. 222/2004 Coll. on Value Added Tax, as amended, Act No. 595/2003 Coll. on Income Tax Act No. 145/1995 Coll. on Administrative Fees, as amended,

Categories of recipients	processor – processing of the economic and accounting agenda The relevant tax offices, the Financial Directorate and other public authorities under the relevant legislation, Statutory representatives of the controller as authorised persons.
Retention periods for deletion of personal data	Annual reports, invoices, internal documents, cash register records, bank statements, financial statements – 10 years Debt recovery – 5 years
Information on the existence of automated decision-making, including profiling ***- Not carried out***	
Cross-border transfer of personal data ***- Not carried out***	

IS Name	**LEGAL AGENDA**
Purpose of processing personal data	The purpose of processing personal data within this agenda is to ensure the management of legal matters (e.g. first-instance proceedings, handling of appeals, handling of court disputes, legal representation, enforcement of decisions on damages, recovery of damages, enforcement of contractual obligations, proposing measures with organisational and legal implications, etc.). The purpose of processing personal data within this agenda is also to secure its claims arising from unpaid obligations of debtors – i.e. the recovery of receivables from debtors as well as the enforcement of liability for damages. This agenda includes the processing of personal data for the purpose of satisfying the creditor (i.e. the controller) in full, ranging from sending reminders and demands, filing a petition with the relevant court of the Slovak Republic or an arbitration court, enforcing a final and binding decision by filing a petition for enforcement with a bailiff, registering a claim in bankruptcy or restructuring proceedings, and other steps associated with enforcing the claim for payment of the outstanding amount.
Legal basis	**Art. 6(1)(c) of the Regulation: processing is necessary for compliance with a legal obligation of the controller arising from the following legislation:** Act No. 40/1964 Coll., the Civil Code Act No. 513/1991 Coll., the Commercial Code Act No. 160/2015 Coll., the Civil Dispute Resolution Code, as amended, Act No. 161/2015 Coll., the Civil Non-Dispute Resolution Code, as amended, Act No. 162/2015 Coll., the Administrative Court Procedure Code, as amended, Act No. 301/2005 Coll., the Code of Criminal Procedure, Act No. 71/1967 Coll., the Administrative Procedure Code, Act No. 233/1995 Coll. on Court Bailiffs and Enforcement Activities (the Enforcement Code) and on the amendment of certain acts, as amended, Act No. 7/2005 Coll. on Bankruptcy and Restructuring and on the amendment of certain acts, as amended, Act No. 153/2001 Coll. on the Prosecution Service, as amended, Act No. 372/1990 Coll. on Minor Offences, as amended, Act No. 586/2003 Coll. on the Legal Profession and on the amendment of Act No. 455/1991 Coll. on Trade Licensing (the Trade Licensing Act), as amended, and other related legislation as amended. **Art. 6(1)(f) of the Regulation: processing is necessary for the purposes of the legitimate interests pursued by the controller,** the controller's main interest being the protection, enforcement and defence of the controller's legal claims,

	including debt recovery, claims for damages, enforcement of contractual claims, out-of-court debt recovery, court and arbitration proceedings, enforcement proceedings, as well as the enforcement of claims in proceedings.
Categories of recipients	courts bailiffs' offices public administration authorities, public authorities and public administration bodies under the relevant legislation, attorney the debtor and their legal representative intervener and other persons participating in the proceedings Authorised persons of the controller
Retention periods for deletion of personal data	3 to 5 years from the termination of the contractual relationship
Information on the existence of automated decision-making, including profiling ***- Not carried out***	
Cross-border transfer of personal data ***- Not carried out***	

IS Name	**REGISTER OF MEMBERS OF A LIMITED LIABILITY COMPANY**
Purpose of processing personal data	The purpose of processing personal data within this agenda is to fulfil the statutory obligation to maintain a list of members and to manage data related to the status of the company's members.
Legal basis	Art. 6(1)(c) of the Regulation: processing is necessary for compliance with a legal obligation of the controller arising from the following legislation: Section 118 of Act No. 513/1991 Coll., the Commercial Code, as amended *"The company shall keep a list of members, in which the name, residence and birth number of a natural person who is a member, or the business name or name, registered office and identification number of a legal entity that is a member, are entered, together with the amount of their contribution and the extent to which it has been paid up. In the case of a foreign legal entity, the identification number is stated if assigned; in the case of a foreign natural person, their date of birth is stated if no birth number has been assigned. Each member has the right to inspect the list of members; the company is obliged to issue an extract from the list of members to a member upon request."*
Categories of recipients	the relevant registry court notary, to the extent laid down by the relevant legislation, public authorities and public administration bodies, to the extent laid down by the relevant legislation, attorneys, if authorised to represent the controller, the company's members, to the extent laid down by the relevant legislation, other persons or entities to whom the controller is obliged or authorised to provide personal data under the relevant legislation.
Retention periods for deletion of personal data	For the duration of the member's participation in the company and thereafter for the period necessary to fulfil statutory obligations and to assert, exercise or defend the controller's legal claims. After the expiry of the stated period, the personal data will be deleted or anonymised without undue delay, provided
Information on the existence of automated decision-making, including profiling ***- Not carried out***	
Cross-border transfer of personal data ***- Not carried out***	

IS Name	REGISTER OF EXECUTIVES (MANAGING DIRECTORS) OF A LIMITED LIABILITY COMPANY
Purpose of processing personal data	The purpose of processing personal data is to ensure the register of the company's executives, to fulfil the statutory obligations related to their appointment to office, performance of office and termination of office, and to ensure compliance with the obligations related to the registration and amendment of data on executives in the Commercial Register (ORSR). The purpose of processing is also to ensure the exercise of the rights and obligations of the company in relation to its statutory bodies and to maintain the related documentation.
Legal basis	Art. 6(1)(c) of the Regulation: processing is necessary for compliance with a legal obligation of the controller arising from the following legislation: Act No. 513/1991 Coll., the Commercial Code, as amended
Categories of recipients	the relevant registry court notary, to the extent laid down by the relevant legislation, public authorities and public administration bodies, to the extent laid down by the relevant legislation, attorneys, if authorised to represent the controller, other persons or entities to whom the controller is obliged or authorised to provide personal data under the relevant legislation.
Retention periods for deletion of personal data	For the duration of the term of office and thereafter for the period necessary to fulfil statutory obligations and to assert, exercise or defend the controller's legal claims. After the expiry of this period, the personal data will be deleted or anonymised without undue delay, unless their further retention is required by the relevant legislation.
Information on the existence of automated decision-making, including profiling ***- Not carried out***	
Cross-border transfer of personal data ***- Not carried out***	

III. RIGHTS OF DATA SUBJECTS

A data subject is a natural person whose personal data we process. Such data subjects, about whom personal data is processed in our information systems for specifically defined purposes, have rights which they may exercise in writing or electronically with the controller's contact person. You are the data subject – **YOU**.

Right of access to personal data

means the right of the data subject to obtain confirmation from the controller as to whether or not personal data concerning them is being processed, and, if so, to obtain access to that data and related information pursuant to Art. 15 of the Regulation.

The data subject has the right to obtain, in particular, information on the purposes of processing personal data, the categories of personal data processed, the recipients or categories of recipients of personal data, the retention period of personal data, the existence of automated decision-

making including profiling and the procedure used, as well as the significance and envisaged consequences of such processing, and other rights arising from the Regulation.

The controller is entitled to take reasonable measures to verify the identity of a data subject requesting access to their personal data.

If the controller processes the personal data of the data subject, it will, upon request, provide the data subject with a copy of the personal data being processed. The first copy is provided free of charge. The controller may charge a reasonable fee reflecting the administrative costs for any further copies requested. If the data subject submits the request by electronic means, the information will be provided in a commonly used electronic form, unless the data subject requests otherwise.



Right to restriction of processing

The right to restriction of processing allows the data subject to request that the controller temporarily restrict the processing of their personal data in the cases set out in Art. 18 of the Regulation.

The data subject may exercise this right in particular:

- if the accuracy of the personal data is contested, for a period enabling the controller to verify the accuracy of the data,
- if the processing is unlawful and the data subject opposes the erasure of the data and requests the restriction of their use instead,
- if the controller no longer needs the personal data for the purposes of processing, but the data subject requires them for the establishment, exercise or defence of legal claims,
- if the data subject has objected to processing pursuant to Art. 21 of the Regulation, pending verification whether the controller's legitimate grounds override those of the data subject.

The restriction of processing may in particular consist of the temporary transfer of the personal data to another processing system, preventing access to the personal data, temporarily suspending the processing operations, or marking the data with the aim of limiting its further processing.



Right to rectification

The data subject has the right to have the controller rectify, without undue delay, inaccurate personal data concerning them. The data subject shall also have the right to have incomplete personal data completed, including by means of providing a supplementary statement, in accordance with Art. 16 of the Regulation.

The controller will carry out the rectification or completion of personal data without undue delay after receiving the data subject's request and verifying the legitimacy of the requested change.



Right to erasure

The data subject has the right to request the controller to erase personal data concerning them, and the controller is obliged to erase such data without undue delay if one of the grounds set out in Art. 17 of the Regulation is fulfilled.

The right to erasure may be exercised in particular in cases where the personal data are no longer necessary for the purposes for which they were collected or otherwise processed, the data subject withdraws the consent on which the processing was based and there is no other legal ground for the processing, the data subject objects to the processing of personal data and there are no overriding legitimate grounds for the processing, the personal data have been processed unlawfully, or erasure is required for compliance with a legal obligation under the Regulation, a specific legal provision or an international treaty to which the Slovak Republic is bound.

However, the right to erasure is not absolute. The controller need not comply with the request in particular where the processing of personal data is necessary for compliance with a legal obligation, for the performance of a task carried out in the public interest, for the establishment, exercise or defence of legal claims, or for other purposes laid down by the Regulation or specific legislation.



Right to lodge a complaint

The data subject has the right to lodge a complaint with the Office for Personal Data Protection of the Slovak Republic if they consider that their rights in the area of personal data protection have been infringed.



Right to object

The data subject has the right to object at any time, on grounds relating to their particular situation, to the processing of their personal data. They may object to the processing of their personal data carried out a) on the legal basis of performance of a task carried out in the public interest or in the exercise of official authority, or on the legal basis of the controller's legitimate interest; b) for the purposes of direct marketing; c) for scientific or historical research purposes or statistical purposes. We will assess any objection received within a reasonable time. In such a case, we may not continue to process the personal data unless we demonstrate compelling legitimate grounds for the processing which override the rights or interests of the data subject, or grounds for the establishment, exercise or defence of a legal claim.



Right to data portability

The data subject has the right to have the personal data they have provided to the controller transmitted to another controller in a commonly used, machine-readable format, provided that the personal data was obtained on the basis of the data subject's consent or on the basis of a contract and its processing is carried out by automated means.

IV. EXPLANATORY NOTES AND ADDITIONAL INFORMATION:

PURPOSE of processing personal data represents the specifically determined reason for which the controller processes the personal data of data subjects in the individual information systems. Personal data may only be processed on the basis of the relevant legal ground and exclusively for a specific, explicitly stated and legitimate purpose in accordance with the Regulation.

The controller processes personal data only to the extent necessary to achieve the stated purpose and ensures that personal data is not further processed in a manner incompatible with that purpose.

In order to ensure the highest possible level of protection of personal data, the controller has adopted appropriate personnel, organisational and technical measures aimed at minimising the risk of unauthorised access, loss, misuse, disclosure or other unauthorised processing of personal data.

The measures adopted take into account, in particular, the nature, scope, context and purposes of the processing of personal data, as well as the risks to the rights and freedoms of natural persons, in accordance with the Regulation.

Should a personal data breach occur despite the measures adopted, and should it be likely to result in a high risk to the rights and freedoms of natural persons, the controller will notify the data subject of this fact without undue delay, in accordance with Art. 34 of the Regulation.

In accordance with the principles of personal data processing under the GDPR, in particular the principle of data minimisation, the controller processes only the personal data that is necessary to achieve the specific purpose of processing and the provision of which constitutes a statutory or contractual requirement.

The data subject is obliged to provide only the personal data that is necessary, in particular, for the conclusion and performance of the contractual relationship or for compliance with the controller's statutory obligations.

Failure to provide the requested personal data may result in the impossibility of concluding the contractual relationship, providing the service, or fulfilling the controller's obligations arising from the relevant legislation.

If you are interested in more detailed information regarding the processing of personal data, or in the case of requests or the exercise of the data subject's rights, please contact the contact person.