

Privacy Notice (General Information)

Under the EU Regulation¹ and the Personal Data Protection Act², VÚRUP, a.s., located at Vlčie hrdlo, P.O.BOX 50, Bratislava 820 03, ID: 35 691 310 (herein the **Company**), processes your personal data in accordance with specific legal regulations.

This Privacy Notice provides you with basic information about your rights regarding the processing of your personal data by the Company and details about how you can access your personal data.

PURPOSE, LEGAL BASIS, AND RETENTION PERIOD OF PERSONAL DATA

Supplier-Customer Relationships

Based on pre-contractual and contractual relationships in which you are one of the parties pursuant to Article 6(1)(b) of the GDPR, and also based on the legitimate interest of the Company pursuant to Article 6(1)(f) of the GDPR, we process your personal data, especially within the framework of supplier and customer contracts, as needed for the creation and performance of these contractual relationships.

The Company may process your personal data under the legitimate grounds of Article 6(1)(f) of the GDPR in the context of contract creation and execution. This includes purposes such as insuring claims or provided services, assessing credit risk, and sending general marketing communications. These communications may include informational emails about the Company's updates, events, products, and services, as well as event invitations.

We collect your personal data directly from you if you're authorized to act on behalf of your company. We also might collect your information from your employer to ensure seamless communication for contract execution. Furthermore, we occasionally source your personal data from publicly available records like trade registers, business registers, and land registries. If personal data is not provided, the Company cannot form a contractual relationship with you when the processing of such data is required for the contract's creation and execution.

Your personal data will be retained for the duration of the contractual relationship and subsequently for archival purposes for 10 years after the contract's termination.

¹Regulation (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, herein the GDPR).

² Act 18/2018 Coll. on Personal Data Protection and on Amendments and Supplements to Certain Acts as amended (herein the PDPA).

Compliance

The Company processes your personal data to fulfil a range of duties, including:

- a) **Compliance with Legal Requirements:** The Company processes your personal data to comply with legally binding requirements, including regulations in the areas of occupational health and safety³ (which involve conducting preliminary breath alcohol tests by designated personnel), fire protection, environmental protection, the prevention of major industrial accidents, and waste management. This requirement extends to any individual who is present at the employer's workplace or premises with the employer's knowledge, in accordance with Article 6(1)(c) of the GDPR.
- b) **Supplier Contractual Compliance:** Ensuring that suppliers (the Company's contractual partners) comply with operational processes, duties, and tasks arising from contractual relationships and the Company's guidelines and policies. This processing is based on the Company's legitimate interest in protecting its assets, financial interests, and ensuring proper contract performance, in line with Article 6(1)(f) of the GDPR.
- c) **Adherence to Ethical Standards:** Following the rules established by the Ethical Code for Business Partners of the MOL Group, which is available on the Company's website www.slovnaft.sk under About Us and Ethical Principles. This processing is driven by the Company's legitimate interest in ensuring ethical behavior among business partners, detecting unethical conduct, and safeguarding the Company's assets and financial interests, in accordance with Article 6(1)(f) of the GDPR.

In the event of an incident, the documentation, investigation, or assessment of circumstances will be recorded and archived until all necessary actions are completed to achieve the intended objectives of personal data processing.

Handling Inquiries, Complaints, Claims, and Incidents

Based on our pre-contractual and contractual relationship under Article 6(1)(b) of the GDPR, and the Company's legitimate interest under Article 6(1)(f) of the GDPR, we process your personal data to address and resolve your inquiries, complaints, customer claims, and incidents (including insurance claims). This applies if you are or have been our customer, or if you have submitted an inquiry or complaint to the Company. We process your personal data for the duration necessary to address your inquiry, complaint, customer claim, or incident. After resolution, your data is archived for a period of 5 years from the end of the calendar year in which the issue was resolved.

Accounting

We also process your personal data to fulfill the Company's obligations in maintaining accurate accounting records, in accordance with Article 6(1)(c) of the GDPR. This includes compliance with laws such as the Accounting Act⁴, the Value Added Tax Act⁵, and other relevant regulations. Your personal data that appears on accounting

³ For instance, Act 124/2006 Coll on Safety and Health at Work and on amendments and supplements to certain acts, as amended.

⁴ Act 431/2002 Coll. on Accounting, as amended.

⁵ Act 222/2004 Coll. on Value Added Tax, as amended.

documents or invoices is retained for a period of 10 years following the year to which these documents pertain.

Registry and Mail Management

We may also process your personal data for the purpose of managing our registry and keeping track of mail, as part of fulfilling the Company's legal obligations under Article 6(1)(c) of the GDPR. This includes compliance with specific legal requirements arising from the Archives and Registries Act⁶, the e-Government Act⁷, and other pertinent laws. The retention periods for these records are determined by the respective legal provisions.

Litigation and Out-of-Court Debt Recovery

We may process your personal data for handling out-of-court debt collection, managing the Company's legal matters (including both ongoing and concluded litigations), and for the purpose of establishing, exercising, or defending the Company's legal rights. The basis for processing personal data for these purposes is the Company's legitimate interest, as outlined in Article 6(1)(f) of the GDPR. Your personal data will be retained for 10 years from the final resolution of the relevant legal matters or out-of-court debt collection. The retention period starts on the first day of the year following the year in which the legal matter or debt collection was resolved.

Court Enforcement

We may also process your personal data to carry out enforcement actions and related proving, asserting, and/or defending the Company's legal claims. The legal basis for processing personal data for this purpose is the Company's legitimate interest if the Company acts as the entitled party in the enforcement proceedings under Article 6(1)(f) of the GDPR. If the Company is involved in enforcement proceedings as a debtor or a third party required to assist in the process, the legal basis for processing personal data is the fulfillment of the Company's legal obligations under the Enforcement Code⁸ (Article 6(1)(c) of the GDPR).

Your personal data is retained for 10 years from the final conclusion of the enforcement proceedings. The retention period begins on the first day of the year following the year in which the enforcement proceedings were concluded.

Protection of Personal Data

We process your personal data solely based on lawful conditions specified in the GDPR or the PDPA.

⁶ Act 395/2002 Coll. on Archives and Registries and on Amendments and Supplements to Certain Acts, as amended.

⁷ Act 305/2013 Coll. on the Electronic Form of Exercise of Public Authority Powers and on Amendments and Supplements to Certain Acts (e-Government Act)

⁸ Act 233/1995 Coll. of the National Council of the Slovak Republic on Court Bailiffs and Enforcement (Enforcement Code) and on Amendments and Supplements to Certain Acts, as amended.

As a data controller, the Company has a legal obligation to provide your personal data during inspections, oversight activities, or upon request by authorized state authorities or institutions, if required by specific regulations⁹.

The Company may also share your personal data with recipients, such as data processors. The Company represents and warrants that it has duly executed agreements with its data processors, ensuring an adequate level of personal data protection, in accordance with applicable data protection laws.

The Company may also provide your personal data to other recipients, such as legal representatives (attorneys), notaries, bailiffs, auditors, insurance companies (where the Company insures its risks), banks, shipment carriers (e.g., Slovenská pošta, a.s., and others), and intermediaries if they are tasked with processing personal data on behalf of the data controller (this includes service providers in the area of occupational health and safety, fire protection, security services, members of the Slovnaft Group providing various services to the Company), and other authorized entities as per applicable legal regulations.

Additionally, your personal data may be shared with MOL Nyrt., located at Dombóvári út 28, Budapest, Hungary, based on legitimate interest for internal administrative purposes within the MOL Group.

Your personal data will be stored securely, in accordance with the security policies of the data controller and data processors, and only for the necessary duration to fulfill the purpose of the data processing. Once the retention periods for individual processing purposes have expired, the personal data will be destroyed (deleted), unless another legal basis exists for further processing (such as asserting legal claims, conducting legal disputes, administrative proceedings, etc.). Access to your personal data will be granted exclusively to individuals authorized by the data controller to process personal data based on the controller's instructions, in compliance with the controller's security policies.

Your personal data is backed up in accordance with the controller's archival rules. Data will be completely erased from backup storage as soon as possible in accordance with the backup policies. Personal data stored on backup media serves to prevent security incidents, particularly data availability disruptions due to security incidents. The Company is required to ensure data backups in line with the security requirements of the GDPR and the PDPA.

Your personal data processed for the purposes stated in this privacy notice does not undergo automated decision-making, including profiling. We do not disclose your personal data or transfer it to third countries or international organizations.

As a **data subject**, i.e., a person whose personal data is being processed, you have certain rights regarding the processing of your personal data.

⁹ For instance, Act 171/1993 Coll. on the Police Force, as amended.

Data Protection Officer

The Data Protection Officer (DPO) oversees the secure processing of your personal data and ensures compliance with the GDPR and the Data Protection Act. You can contact the DPO if you wish to exercise your rights.

Contact details for the Data Protection Officer:

Email: zodpovednaosobagdpr@vurup.sk

Postal Address: Data Protection Officer GDPR, VÚRUP, a.s., Vlčie hrdlo, P.O.BOX 50, 820 03 Bratislava

Your Rights under the GDPR and the PDPA

The GDPR and the PDPA provide detailed information about your rights as a data subject, the available means of redress, and any limitations on these rights (notably Articles 15-22, 77, 79, and 82 of the GDPR, Sections 21-28, and 38 of the PDPA). At any time, you can request information about the processing of your personal data, request corrections or deletions of your personal data, or request restrictions on their processing. You can also object to the processing of your personal data on the basis of legitimate interest and to the sending of direct marketing messages. Additionally, you have the right to data portability. Below is a summary of the most important provision.

Right to Information

If the controller processes your personal data, they must provide you with information about the data concerning you, even without your explicit request. This includes the main characteristics of the data processing, such as its purpose, legal basis, and retention period. It also includes the identity and contact details of the controller and, where applicable, their representative, the recipients of the personal data (and, in the case of transfers to third countries, information about appropriate safeguards), the legitimate interests of the controller and/or third parties when data is processed on the basis of legitimate interest, your data protection rights, and means of redress (including the right to lodge a complaint with a supervisory authority). If automated decision making, including profiling, is involved, you should be clearly informed about the methods used, along with the significance and potential impact of this processing on you. The controller will make this information available by ensuring the privacy notice is accessible. The above does not apply if you already have the information as a data subject.

Right of Access

You have the right to obtain confirmation from the controller as to whether your personal data is being processed and, if so, to gain access to that data. This includes information on the purposes of processing, categories of personal data, recipients or categories of recipients to whom the personal data has been or will be disclosed, especially recipients in third countries or international organizations, the expected retention period of the personal data, or if that is not possible, the criteria used to determine that period, your rights regarding the protection of your personal data and means of redress (including the right to lodge a complaint with a supervisory

authority), as well as information about the source of the personal data if it was not obtained directly from you. Upon your request, the controller will provide a copy of your personal data that is being processed. For any additional copies requested, the controller may charge a reasonable fee based on administrative costs. The right to obtain a copy must not adversely affect the rights and freedoms of others. The controller will provide details on how to make a request, the process, any associated costs, and other pertinent information upon receipt of your request.

If you submitted your request electronically, the information will be provided in a commonly used electronic format unless you request otherwise.

If automated decision-making, including profiling, is involved, you should have access to information about the process used, as well as the significance and expected consequences of such processing for you.

Right to Rectification

You have the right to have the controller correct any inaccurate personal data concerning you without undue delay. Considering the purposes of the processing, you also have the right to have incomplete personal data completed, including by providing a supplementary statement.

Right to Erasure (Right to Be Forgotten)

You also have the right to have your personal data erased by the controller without undue delay, and the controller is obligated to erase your personal data without undue delay if certain conditions are met. The reasons for which the controller is obligated to erase your personal data upon your request include, but are not limited to:

- The personal data is no longer necessary for the purposes for which it was collected or otherwise processed.
- You withdraw your consent on which the processing is based, and there is no other legal ground for the processing.
- The personal data has been unlawfully processed.
- You object to the processing and there are no overriding legitimate grounds for the processing.
- The personal data must be erased to comply with a legal obligation in Union or Member State law to which the controller is subject.
- The personal data has been collected in relation to the offer of information society services.

There are cases where the controller may not be able to comply with your request for erasure. This includes situations where the processing is necessary:

- For exercising the right of freedom of expression and information.
- To comply with a legal obligation that requires processing under Union or Member State law to which the controller is subject, or for the performance of a task carried out in the public interest.
- For reasons of public interest in the area of public health.
- For archiving purposes in the public interest.

- For the establishment, exercise, or defense of legal claims

Right to Restriction of Processing

You have the right to have the controller restrict processing where one of the following applies:

- a) You contest the accuracy of the personal data, for a period enabling the controller to verify the accuracy of the personal data.
- b) The processing is unlawful, and you oppose the erasure of the personal data and request the restriction of their use instead.
- c) The controller no longer needs the personal data for the purposes of the processing, but you require them for the establishment, exercise, or defense of legal claims.
- d) You have objected to processing pending the verification of whether the legitimate grounds of the controller override your legitimate grounds

If processing has been restricted based on the above reasons, such personal data shall, with the exception of archival, only be processed with your consent or for the establishment, exercise, or defense of legal claims, for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or a Member State.

The controller will inform you before the restriction of processing is lifted.

Right to Data Portability

You have the right to receive the personal data concerning you, which you have provided to the controller, in a structured, commonly used, and machine-readable format, and you have the right to transmit those data to another controller without hindrance from the controller to which the data was provided, where:

- a) The processing is based on your consent or on a contract to which you are a party
AND
- b) The processing is carried out by automated means.

In exercising your right to data portability, you have the right to have your personal data transmitted directly from one controller to another, where technically feasible.

The exercise of the right to data portability shall not adversely affect the rights and freedoms of others, and it does not affect the right to erasure.

Right to Object

You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data that is based on the legitimate interests of the controller or when the controller processes personal data in the public interest, including objections to profiling based on those provisions. The controller shall no longer process your personal data unless they can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or for the establishment, exercise, or defense of legal claims.

If your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such marketing, including profiling to the extent that it is related to such direct marketing. If you object to the processing for direct marketing purposes, your personal data shall no longer be processed for such purposes.

Right to Withdraw Consent at Any Time

Where the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. The withdrawal of consent shall be as easy as giving the consent.

You can withdraw your consent by sending a letter to the registered office of the controller or via email to the Data Protection Officer, or as specified in the given consent form.

Right to Lodge a Complaint with a Supervisory Authority

If you believe that the processing of your personal data infringes the GDPR or the PDPA, you have the right to lodge a complaint with a supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27; telephone: +421 /2/ 3231 3214; Email: statny.dozor@pdp.gov.sk; Website: <https://dataprotection.gov.sk>.

Right to an Effective Judicial Remedy

You have the right to an effective judicial remedy if you consider that your rights have been infringed as a result of the processing of your personal data in violation of the GDPR/PDPA. You have the right to initiate legal proceedings in the courts of either the Member State where the controller is established or where you usually reside.

Right to Compensation and Liability

Any individual who has suffered material or non-material damage as a result of a violation of the GDPR or the PDPA is entitled to compensation for the damage incurred by the data controller.

The data controller is liable for any harm caused by the processing of personal data that they have participated in, and which was in breach of the GDPR or the PDPA (damages arising from unlawful data processing). The controller is exempt from liability for damage caused by unlawful processing if they prove that they are not responsible for the event giving rise to the damage (i.e., they did not cause the damage)

If you have any questions regarding the processing of your personal data, you can contact us through our Data Protection Officer

Changes regarding the conditions of processing and protecting personal data will be published on our website by updating this privacy notice. In this way, we ensure that you always have access to current information about the conditions under which we process your personal data