

## THE PRIVACY POLICY

STRICTI IURIS s.r.o.

This Privacy Policy (hereinafter as the "**Policy**") contains information about the processing of your personal data by the **STRICTI IURIS s.r.o** with registered seat Janka Kráľa 609/23, 922 42 Madunice, ID: 51 066 645, company registered in the Commercial Register of the City Court Bratislava III, section: Sro, insert No. 150851/B (hereinafter only as "**the Controller**").

**The Controller provides you via this Policy information on why your personal data are processed, how they are processed, how long they are stored, what are your rights in connection with the processing of your personal data and other relevant information about the processing of your personal data.**

The Controller processes your personal data in accordance with Regulation (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) (**hereinafter referred to as the "Regulation"**), relevant Slovak legislation, in particular Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments to Certain Acts (hereinafter referred to as the "**Act**") **and other regulations on the protection of personal data** (Regulation, *the Act* and other regulations on the protection of personal data, hereinafter collectively referred to as the "**Personal Data Protection Regulations**").

You can contact the Data Controller in matters related to the processing and protection of personal **STRICTI IURIS s.r.o** with registered seat Janka Kráľa 609/23, 922 42 Madunice or by e-mail to the e-mail address [gdpr@naturagiganto.eu](mailto:gdpr@naturagiganto.eu).

### INFORMATION ON PROCESSING OPERATIONS (categories of personal data, purposes of processing, legal bases and retention periods) – GENERAL PURPOSES

The Controller processes your personal data **exclusively in accordance with the principle of minimization**, which means that the Controller does not require from you personal data that are not necessary for a specific and justified purpose of processing. **The controller processes personal data only if there is a legal basis for their processing and thus they are processed in accordance with the principle of legality.** The specific purposes, including the specified legal basis and the retention period for which the Controller processes your personal data, can be found in the table below.

<b>The processing purpose</b>	<b>Processing of accounting documents</b>
<b>The legal base</b>	Article 6(1)(c) of the Regulation ( <i>processing of personal data is necessary for compliance with a legal obligation to which the Controller is subject</i> )
<b>Categories of personal data</b>	Common personal data necessary for the fulfilment of legal obligations (name, surname, address of residence / place of business, service delivery address, contact details, phone number, email address, bank details), other personal data necessary for the processing of accounting agenda
<b>Retention period</b>	the 10 years following the year to which they relate
<b>The processing purpose</b>	<b>Registry administration, registration and handling of received and outgoing mail (including electronic communication with relevant institutions)</b>
<b>The legal base</b>	Article 6(1)(c) of the Regulation ( <i>processing of personal data is necessary for compliance with a legal obligation to which the Controller is subject</i> )
<b>Categories of personal data</b>	Common personal data
<b>Retention period</b>	Mail - 5 years following the year to which they relate, other records forming the registry within the meaning of the relevant provisions of Act No. 395/2002 Coll. on archives and registries and on the amendment of certain acts, as amended
<b>The processing purpose</b>	<b>Conduct of judicial and administrative proceedings</b>
<b>The legal base</b>	Article 6(1)(c) of the Regulation ( <i>processing of personal data is necessary for compliance with a legal obligation to which the Controller is subject</i> )
<b>Categories of personal data</b>	Common personal data necessary to comply with legal obligations

<b>Retention period</b>	For the duration of the relevant proceedings and until the expiry of limitation periods (unless otherwise provided by applicable law)
<b>The processing purpose</b>	
<b>The legal base</b>	Article 6(1)(c) of the Regulation ( <i>processing of personal data is necessary for compliance with a legal obligation to which the Controller is subject</i> )
<b>Categories of personal data</b>	Common personal data as a part of the data subject's request and are necessary to comply with legal obligations
<b>Retention period</b>	Unit the processing of the exercised rights in accordance with the relevant provisions of the Regulation (maximum 120 days)
<b>The processing purpose</b>	
<b>The legal base</b>	Art. 6(1)(f) of the Regulation ( <i>processing is necessary for the purposes of the legitimate interests pursued by the controller</i> )
<b>Categories of personal data</b>	Common personal data as a part of the data subject's request and are necessary to comply with legal obligations
<b>Retention period</b>	5 years following the date on which the right exercised or the request made by the data subject was dealt with
<b>The processing purpose</b>	
<b>The legal base</b>	Article 6(1)(b) of the Regulation ( <i>processing is necessary for the performance of a contract to which the data subject is party</i> )
<b>Categories of personal data</b>	Common personal data
<b>Retention period</b>	10 years after the termination of the contractual relationship due to registration within the accounting agenda
<b>The processing purpose</b>	
<b>The legal base</b>	Article 6(1)(f) of the Regulation - <i>the processing of personal data is carried out on the basis of the legitimate interest of the Controller, which consists in the necessity of records of contact persons of employees, representatives and contact persons of business partners in the position of legal entities for the needs of bookkeeping, ensuring internal control activities, fulfilment of contractual obligations towards legal entities and for the enforcement of legal and other claims arising from concluded contracts</i>
<b>Categories of personal data</b>	Name, surname, title, legal entity identifier (function or job position), contact details (phone number, e-mail address)
<b>Retention period</b>	During the duration of the contractual relationship with the legal entity and after its termination until the expiry of the relevant limitation periods and until the full settlement of contractual and other claims arising from the contractual relationship or until the termination of the position of a natural person as a representative or contact person of the partner - legal entity, if further processing of personal data after the termination of such status is not necessary for the specified purpose
<b>The processing purpose</b>	
<b>The legal base</b>	Article 6(1)(b) of the Regulation ( <i>processing is necessary for the performance of a contract to which the data subject is party</i> )

<b>Categories of personal data</b>	Name, surname, business name, address of the place of business, ID, VAT ID, VAT number, contact details (tel. no., e-mail), bank details
<b>Retention period</b>	During the contractual relationship and after its termination, until the full settlement of contractual and other claims arising from the contractual relationship or until the expiry of the relevant limitation periods, whichever occurs first
<b>The processing purpose</b>	<b>Processing of personal data within the scope of the contact form on the Controller's website</b>
<b>The legal base</b>	Article 6(1)(a) of the Regulation ( <i>the data subject has given consent to the processing of his or her personal data</i> )
<b>Categories of personal data</b>	Common personal data in the scope: name, surname, contact details (e-mail, telephone), including other additional data in the scope of the form
<b>Retention period</b>	No longer than 1 year from the date of consent or until its withdrawal, whichever occurs first
<b>The processing purpose</b>	<b>Handling of complaints</b>
<b>The legal base</b>	Article 6(1)(c) Regulations - <i>the processing of personal data is carried out in compliance with legal obligations</i>
<b>Categories of personal data</b>	Common personal data necessary to comply with legal obligations
<b>Retention period</b>	4 years following the date of the complaint, in the case of natural persons - non-entrepreneurs 3 years following the date of the complaint
<b>The processing purpose</b>	<b>Responding to messages and handling queries / requests from messages delivered to the Controller through the published contact on the website, e-mail communication or by phone</b>
<b>The legal base</b>	Article 6(1)(f) Regulations - <i>the processing of personal data is carried out on the basis of the legitimate interest of the Controller, which is to respond to received messages for the proper conduct of business communication, improving the quality of services provided and attracting new clientele</i>
<b>Categories of personal data</b>	Name, surname, e-mail, phone number, other data contained in the report
<b>Retention period</b>	60 days from the date of receipt of the request or until the request is processed (fulfilment of the purpose), whichever occurs first
<b>The processing purpose</b>	<b>Measuring website traffic and targeting the Controller's advertising through the use of cookies</b>
<b>The legal base</b>	Article 6(1)(a) of the Regulation ( <i>the data subject has given consent to the processing of his or her personal data</i> )
<b>Categories of personal data</b>	Common personal data - data about website activity and preferences in the online environment
<b>Retention period</b>	Maximum 2 years from the date of consent or until its withdrawal, whichever occurs first
<b>The processing purpose</b>	<b>Sublease of non-residential premises</b>
<b>The legal base</b>	Article 6(1)(b) Regulation - <i>the processing of personal data is carried out in the performance of the contract and the implementation of pre-contractual relations</i>
<b>Categories of personal data</b>	Name, surname, business name, address of the place of business, IČO, VAT ID, VAT number, contact details (tel. no., e-mail), bank details

<b>Retention period</b>	During the duration of the contractual relationship with the legal entity and after its termination until the expiry of the relevant limitation periods and until the full settlement of contractual and other claims arising from the contractual relationship or until the termination of the position of a natural person as a representative or contact person of the partner - legal entity, if further processing of personal data after the termination of such status is not necessary for the specified purpose

In order to ensure the protection of your personal data, the Controller has taken appropriate security measures, which it has documented, both at the organizational and technical level.

#### **TO WHOM THE CONTROLLER PROVIDES YOUR PERSONAL DATA?**

In certain cases, the Controller is obliged to provide your personal data to public authorities authorized to process your personal data, e. g. courts, law enforcement authorities as well as supervisory and supervisory authorities (e. g. the Office for Personal Data Protection in case of inspection) (third parties), owner of non-residential premises **Incheba, a.s.**, with registered seat Viedenská cesta 3-7, 851 01 Bratislava, ID: 00 211 097, registered in Business Register of the City Court Bratislava III, section. Sa, insert No. 10/B – for the purpose of access to the premises, access to the fairgrounds and for the purpose of registering tenants and subtenants.

The Controller also provides your personal data to its processors, i. e. external entities that process your personal data on behalf of the Controller. Intermediaries process personal data on the basis of a contract concluded with the Controller, in which they undertake to take appropriate technical and security measures in order to safely process your personal data. The Controller's processors include:

- **company providing services in field of security at work and fire protection,**
- **company providing accounting services,**
- **company providing hosting services (including mail hosting services),**
- **company providing marketing services,**
- **company Google Inc., 1600 Amphitheatre Parkway Mountain View, California 94043 USA (Google formular).**

#### **TRANSFER TO THIRD COUNTRIES AND INTERNATIONAL ORGANISATIONS AND AUTOMATED INDIVIDUALISED DECISION-MAKING, INCLUDING PROFILING?**

The transfer of your personal data to the USA to Google Inc., 1600 Amphitheatre Parkway Mountain View, California 94043 USA is secured on the basis of an adequacy decision of the European Commission regarding the EU-US data protection framework based on Art. 45 GDPR.

The Controller does not transfer your personal data to any other third countries and/or international organizations.

The Controller does not use profiling when processing your personal data and does not process personal data in any form of automated individual decision-making that would evaluate your personal aspects.

## WHAT ARE YOUR RIGHTS IN RELATION TO THE PROCESSING OF PERSONAL DATA?

In connection with the processing of your personal data, you as the data subject have the following rights:

<p><b>Right of access - as the data subject, you have the right to</b> obtain from the Controller confirmation as to whether it processes your personal data and, if so, you have the right to access such personal data and information pursuant to Article 15 of the Regulation. The Controller will provide you with a copy of the personal data being processed. If you submit a request by electronic means, the Controller will provide you with the information in a commonly used electronic form, unless you request another method.</p>	<p><b>Right to rectification</b> - the Controller has taken appropriate measures to ensure the accuracy, completeness and timeliness of your personal data. As the data subject, you have the right to have the Controller correct your incorrect personal data or complete your incomplete personal data without undue delay.</p>
<p style="text-align: center;"><b>RIGHT TO OBJECT</b></p> <p>You have the right to object to the processing of personal data, for example if the Controller processes <b>your personal data on the basis of a legitimate interest or in processing in which profiling takes place</b>. If you object to such processing of personal data, the Controller will no longer process your personal data unless it demonstrates compelling legitimate reasons for further processing of your personal data.</p>	
<p><b>Right to erasure ("right to be forgotten")</b> - You also have the right to obtain from the Controller the deletion of your personal data without undue delay if certain conditions are met, for example if personal data are no longer necessary for the purposes for which the Controller obtained or processed them. However, this right of yours must be assessed individually, as there may be a situation where other circumstances prevent the Controller from deleting personal data (for example, a legal obligation of the Controller). This means that in such a case, the Controller will not be able to comply with your request for deletion of personal data.</p>	<p><b>Right to data portability</b> - under certain circumstances, you have the right to transfer personal data to another Controller you designate. However, the right to portability applies only to personal data that the Controller processes on the basis of the consent you have given to the Controller on the basis of a contract to which you are one of the parties or if the Controller processes personal data by automated means.</p>
<p style="text-align: center;"><b>RIGHT TO WITHDRAW CONSENT</b></p> <p>If the Controller processes your personal data on the basis of your consent, you have the right to withdraw your consent at any time in the same form as you gave it. The withdrawal of consent does not affect the lawfulness of processing carried out prior to the withdrawal of consent.</p>	
<p><b>Right to restriction of processing</b> - You also have the right to have the Controller restrict the processing of your personal data. This will be the case, for example, if you contest the accuracy of the personal data or if the processing is unlawful and you request the restriction of processing, or if the Controller no longer needs your personal data for processing purposes, but you need them for the establishment, exercise or defence of legal claims. The Controller will restrict the processing of your personal data if you request it.</p>	<p><b>Right to file a complaint or suggestion</b> - If you feel that your personal data are processed in violation of applicable law, you may contact the supervisory authority, which is the <b>Office for Personal Data Protection of the Slovak Republic</b>, with its registered office Hraničná 12, 820 07 Bratislava 27; Website: <a href="http://dataprotection.gov.sk">dataprotection.gov.sk</a>, Phone number: 02 3231 3214; e-mail: <a href="mailto:statny.dozor@pdp.gov.sk">statny.dozor@pdp.gov.sk</a></p>

You can exercise your rights listed in the table above at the contact addresses of the Controller listed at the beginning of this document.

The Controller will provide you with an answer to exercising your rights free of charge. In case of repeated, unjustified or excessive request to exercise your rights, the Controller is entitled to charge a reasonable fee for providing information. The Controller will provide you with an answer within 1 month from the day on which you exercised your rights. In certain cases, the Controller is entitled to extend this period, in case of a high number and complexity of requests from data subjects, but not more than 2 months. The Controller will always inform you about the extension of the period.

## **VALIDITY**

This Policy is valid and effective from the date of first adoption of this Policy by acceptance by e-mail. Due to the fact that an update of information on the processing of personal data contained in this Policy may be required in the future, the Controller is entitled to update this Policy at any time. In such a case, however, the Controller will inform you accordingly in advance.