

Privacy policy

The company GOLEMTECH MA s. r. o., located Trnavská 524/20, 919 34 Cífer, 56 263 902, registered in the Commercial Register of the District Court Trnava , section: Sro , insert no. 56839/T (hereinafter referred to as the "Operator") in the provision of services under its business license, ensures the protection of personal data of individuals in accordance with the requirements of Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46 / EC (the General Data Protection Regulation) (hereinafter referred to as the "Regulation") and the Law no. 18/2018 Coll. on the Protection of Personal Data and on Amendments and Supplements to Certain Acts (hereinafter referred to as the "Act").

Information obligation on data subjects in the processing of personal data

• Information to be provided when obtaining personal data from the data subject

Where personal data related to data subject are obtained from the data subject, the operator shall, in obtaining personal data from the data subject or intending to process personal data for a purpose other than that obtained, provide all such information:

- operator identity and contact details;
- contact details of any responsible person; the purposes of the processing for which the personal data are intended, as well as the legal basis of the processing;
- where the processing is based on a legal basis of legitimate interest, the legitimate interests pursued by the controller or by a third party;
- recipients or categories of recipients of personal data, if any;
- where relevant, information that the operator intends to transfer personal data to a third country or international organization and information on the existence or non-existence of a Commission decision on adequacy or in the case of transfers referred to in Art. 46 or 47 or in the second subparagraph of Article 49 (1) of the Regulation, a reference to appropriate safeguards and means of obtaining a copy thereof or where they have been provided;
- the retention period of personal data or, if this is not possible, the criteria for determining it;
- the existence of the right to require the operator to have access to personal data relating to the data subject and the right to rectify or erase or restrict the processing, or to object to the processing, as well as the right to portability;
- if the processing is based on a legal basis, which is the consent of the data subject, the existence of the right to withdraw its consent at any time without prejudice to the lawfulness of the processing based on consent granted prior to its withdrawal;
- the right to lodge a complaint with the supervisory authority (Slovak Data Protection Authority);
- information on whether the provision of personal data is a legal or contractual requirement or a requirement necessary to conclude a contract, whether the data subject

is required to provide personal data as well as the possible consequences of not providing such data;

- the existence of automated decision making, including profiling and meaningful information on the procedure used, as well as the significance and anticipated consequences of such processing for the data subject.

The information obligation does not apply to the extent that the person concerned already has the information.

- **Information to be provided if personal data have not been obtained from the data subject**

Where personal data have not been obtained from the data subject or intend to process personal data for any purpose other than those obtained, the operator shall provide the data subject with the following information:

- operator identity and contact details;
- contact details of any responsible person;
- the purposes of the processing for which the personal data are intended, as well as the legal basis of the processing;
- the categories of personal data concerned;
- recipients or categories of recipients of personal data, if any;
- where relevant, information that the operator intends to transfer personal data to a third country or international organization and information on the existence or non-existence of a Commission decision on adequacy or in the case of transfers referred to in Art. 46 or 47 or in the second subparagraph of Article 49 (1) of the Regulation, a reference to appropriate safeguards and means of obtaining a copy thereof or where they have been provided;
- the retention period of personal data or, if this is not possible, the criteria for determining it;
- where processing is based on Article 6 (1) (f), the legitimate interests pursued by the controller or by a third party;
- the existence of the right to require the operator to have access to personal data relating to the data subject and the right to rectify or erase or restrict the processing, and the right to object to the processing, as well as the right to transfer data;
- if the processing is based on a legal basis, which is the consent of the data subject, the existence of the right to withdraw its consent at any time without prejudice to the lawfulness of the processing based on consent granted prior to its withdrawal;
- Obligation to inform the persons concerned of the right to lodge a complaint with the supervisory authority (Slovak Data Protection Authority);
- the source of personal data, or whether the data originate from publicly available sources;
- the existence of automated decision making, including profiling and meaningful information on the procedure used, as well as the significance and anticipated consequences of such processing for the data subject.

The operator shall provide the above information: within a reasonable time after receiving the personal data, but not later than one month, taking into account the particular circumstances under which the personal data are processed; if personal data are to be used for communication with the data subject, at the latest at the time of first communication with the data subject; or, if the provision of personal data to another recipient is foreseen, at the latest when personal data are first provided.

The information obligation does not apply to the extent that:

- the person concerned already has the information; the provision of such information proves impossible or would require disproportionate efforts, in particular in the case of processing for purposes of archiving in the public interest, for scientific or historical research or for statistical purposes covered by the conditions and guarantees under Article 89 (1) of the Regulation, or where the information obligation is likely to make it impossible or seriously difficult to achieve the objectives of such processing.

In such cases, the operator shall take appropriate measures to protect the rights and freedoms and legitimate interests of the data subject, including making the information available to the public;

- the acquisition or provision is expressly provided for in European Union law or in the law of the Slovak Republic, providing for appropriate measures to protect the legitimate interests of the data subject; or
- when personal data must remain confidential under the obligation of professional secrecy governed by European Union law or the law of the Slovak Republic, including confidentiality obligations arising from the statute.

- **Information about processing personal data for marketing purposes**

Operator and his contact details

GOLEMTECH MA s. r. o.

Trnavská 524/20, 919 34 Cífer

Company ID: 56 263 902

registered in Commercial Register of the Trnava District Court, Section: Sro, Insert no. 56839/T

Phone number: 033 321 0000

E-mail : helpdesk@hotspotzavar.sk

Purpose of processing

GOLEMTECH MA s. r. o. processes personal data on the basis of the following legal titles established by regulation and law:

- Contract performance

GOLEMTECH MA s. r. o. processes personal data of the persons concerned for purposes related to the fulfillment of contractual obligations of both parties, in particular the conclusion, modification and termination of the contract. The provision of personal data by the company concerned to the extent necessary is a condition for the conclusion of the contract. Failure to provide personal data may render the conclusion of the contract impossible. GOLEMTECH MA s. r. o. provide the person concerned with information which personal data is necessary for the conclusion of the contract and which may be provided, for example, for the purpose of improving communication efficiency. GOLEMTECH MA s. r. o. stores personal data for the purpose of performance of the contract during the term of the contractual relationship between the company and the person concerned and the necessary time after its termination.

- Fulfillment of the legal obligation

GOLEMTECH MA s. r. o. it may process personal data, including the provision of personal data, to public authorities and other persons if such an obligation arises by law. GOLEMTECH MA s. r. o. may, for example, by reason of a statutory obligation, provide personal data to the Slovak Trade Inspection, law enforcement authorities or other state authorities or relevant persons in accordance with the law. GOLEMTECH MA s. r. o. stores personal data for the purpose of fulfilling the legal obligation for no longer than is necessary for the performance of the relevant legal obligation stipulated by generally binding legal regulations.

- Consent granted by the person concerned

GOLEMTECH MA s. r. o. processes personal data of data subjects to the agreement expressly granted by the person concerned.

GOLEMTECH MA s. r. o. stores personal data processed by the data subject's consent for the duration of such consent or until it is withdrawn, whichever comes first.

The person concerned has the right to revoke his consent to the processing of personal data at any time. The withdrawal of consent does not affect the legality of the processing based on consent prior to its withdrawal .

Legal basis of processing

The data subject has expressed his / her consent to the processing of his / her personal data under Art. 6 para . 1 (a) of Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46 / EC (General Data Protection Regulation) § 13 par. 1 (a) of Act no. 18/2018 Coll. on the protection of personal data and on amendments to certain acts.

Beneficiaries

GOLEMTECH MA s. r. o. may entrust the processing of personal data to third parties, so called intermediaries. Intermediaries of GOLEMTECH MA s. r. o. are, for example, persons who for GOLEMTECH MA s. r. o. ensure the preparation of contractual documents such as external law firms or cooperating lawyers, server or IT services companies. Intermediaries process personal data for GOLEMTECH MA s. r. o. solely on the basis of a personal data processing contract, which must comply with the requirements set out in the Regulation and the Data Protection Act and GOLEMTECH MA s. r. o. in such cases, he / she strictly takes care of the protection of personal data that he / she will provide to intermediaries.

GOLEMTECH MA s. r. o. does not provide personal data outside the EU and EEA .

List of intermediaries:

PAYMENT GATEWAY

Requirement to provide personal data and possible consequences of not providing it

The provision of personal data is neither a legal requirement nor a contractual requirement, nor a requirement to enter into a contract, the data subject is not obliged to provide personal data.

Automated decision making including profiling

Not performed.

Rights of the person concerned

Irrespective of the legal basis for the processing of personal data, the data subject has the right of access to personal data, the right to rectify them, the right to delete them, the right to restrict processing, the right to transfer data, the right to object to the processing of personal data, the right not to be subject to a decision based solely on automated processing, including profiling, the right to lodge a complaint with the supervisory authority (the Slovak Data Protection Authority) and the right to withdraw the consent to the processing of personal data if personal data are processed by consent. Detailed information on the rights of the persons concerned and how they are exercised is available on the operator's website at <http://www.golemtech.sk/> .

Rights of data subjects in the processing of personal data

Irrespective of the legal basis for the processing of personal data, the data subject has the right of access to personal data, the right to rectify them, the right to delete them, the right to restrict processing, the right to transfer data, the right to object to the processing of personal data, the right not to be subject to a decision based solely on automated processing, including profiling, the right to lodge a complaint with the supervisory authority (the Slovak Data Protection Authority) and the right to withdraw the consent to the processing of personal data if personal data are processed by consent.

- **The right of the data subject to access data provided (Article 15 of the Regulation; § 21 of the Act)**

The data subject has the right to obtain confirmation from the operator, that he / she processes personal data concerning him / her and, if so, has the right to access such personal data and the following information: processing purposes; categories of personal data; recipients or categories of recipients to whom personal data have been or will be provided, in particular recipients in third countries or international organizations; if possible, the expected retention period of personal data, if this is not possible, the criteria for determining it; the existence of the right to request the correction of personal data relating to the data subject or their deletion or limitation of processing or the right to object to such processing; the right to lodge a complaint with the supervisory authority (Slovak Data Protection Authority); if personal data have not been obtained from the data subject, any available information as to their source; the existence of automated decision making, including profiling and information on the procedure used, as well as the significance and implied consequences of such processing for the data subject; when transferring personal data to a third country or international organization, information on reasonable assurances regarding transmission. The operator shall provide a copy of the personal data being processed. For any additional copies requested by the data subject, the operator may charge a reasonable fee corresponding to the administrative costs. Where the person concerned has made an application by electronic means, the information shall be provided in a commonly used electronic form, unless the person concerned has requested a different method. The right to obtain a copy of the personal data that is being processed must not have adverse effects on the rights and freedoms of others.

- **Right to rectification (Art. 16 of the Regulation; § 22 of the Act)**

The data subject has the right to have the operator rectify, without undue delay, incorrect personal data relating to him. With regard to processing purposes, the data subject shall have the right to supplement incomplete personal data, including through the provision of a supplementary declaration.

- **Right to delete (right to "forget", Article 17 of the Regulation; § 23 of the Act)**

The data subject has the right to delete personal data relating to him or her without undue delay if any of the following are fulfilled: personal data are no longer necessary for the purposes for which they were obtained or otherwise processed; the person concerned shall withdraw the consent under which it is processed if there is no other legal basis for processing; the person concerned objects to the processing which is carried out on a legal basis of public interest or of a legitimate interest and does not outweigh any legitimate reasons for the processing or the person concerned objects to the processing for the purposes of direct marketing; personal data have been processed illegally; personal data must be deleted in order to comply with legal obligations under European Union law or Slovak law; personal data was collected in connection with the offer of information society services (based on the consent of

a child under the age of 16). Rights of data subjects: If the operator has disclosed personal data and is obliged to delete it, taking into account the technology available and the cost of implementing the measures, take appropriate measures, including technological measures, to inform the operators processing the personal data that the data subject requests them to delete all links to this personal information, copies or replicas. The right to erase does not apply if processing is necessary: to obey a legal obligation that requires processing under European Union law or the law of the Slovak Republic, or to perform a task performed in the public interest or in the exercise of public authority entrusted to the operator; for reasons of public interest in public health; for the purposes of archiving in the public interest, for the purposes of scientific or historical research or for statistical purposes, as long as the right of erasure is likely to render impossible or seriously hamper the attainment of the objectives of such processing; to prove, enforce or defend legal claims.

- **Right to restrict processing (Art. 18 of the Regulation; § 24 of the Act)**

The data subject shall have the right to have the operator limit the processing in respect of one of the following cases: the data subject shall challenge the accuracy of the personal data during the period allowing the operator to verify the accuracy of the personal data; processing is illegal and the person concerned objects to the deletion of personal data and asks instead to limit their use; the operator no longer needs personal data for processing purposes or needs the data subject to prove, enforce or defend legal claims; the person concerned objected to the processing on a legal basis of public interest or legitimate interest, until verification that the legitimate reasons on the part of the operator prevail over the legitimate reasons of the data subject. If the processing has been limited, such personal data, with the exception of retention, are processed only with the consent of the data subject or to prove, exercise or defend legal claims, or to protect the rights of another natural or legal person, or for reasons of important belief in the European Union or the Slovak Republic. The operator informs the data subject who has reached the processing limit before the processing restriction is canceled.

- **Reporting obligation in relation to the repair or deletion of personal data or the limitation of processing (Art. 19 of the Regulation; § 25 of the Act)**

The operator shall notify any recipient to whom personal data have been provided, any rectification or erasure of personal data or restriction of processing, unless this proves impossible or involves a disproportionate effort. The operator shall inform the data subject of the beneficiary concerned if the person concerned so requests.

- **Right to portability of data (Art. 20 of the Regulation; § 26 of the Act)**

The data subject has the right to obtain personal data relating to him which he has provided to the operator, in a structured, commonly used and machine-readable format and has the right to transfer this data to another operator without prevention from the operator to whom the personal data was provided, if: the processing is based on the consent of the person concerned or under the contract; if the processing is carried out by automated means. The data subject shall have the right to transfer personal data directly from one operator to another, when technically possible, when exercising the right of data portability. That right shall not apply to the processing necessary for the performance of a task carried out in the public interest or in the exercise of public authority entrusted to the operator. The right to portability of data must not adversely affect the rights and freedoms of others.

- **Right to dispute (Art. 21 of the Regulation; § 27 of the Act)**

If the legal interest of personal data processing is the performance of a task in the public interest or in the exercise of public power entrusted to the operator or a legitimate interest, the data subject has the right to object to the processing of personal data relating to him, including opposition to profiling. The operator may not further process personal data unless it proves the necessary legitimate reasons for processing that outweigh the interests, rights and freedoms of the person concerned, or the reasons for proving, exercising or defending legal claims. If personal data are processed for direct marketing purposes, the data subject has the right to object to the processing of personal data relating to him, the purpose of such marketing, including profiling to the extent that it relates to such direct marketing. If the person concerned objects to the processing for the purposes of direct marketing, personal data may no longer be processed for such purposes. If personal data are processed for the purposes of scientific or historical research or statistical purposes, the data subject has the right to object to the processing of personal data relating to him except where the processing is necessary to perform a task in the public interest.

- **Automated individual decision making including profiling (Art. 22 of the Regulation; § 28 of the Act)**

The person concerned has the right to not be subject to a decision which is based solely on automated processing, including profiling, which produces legal effects concerning him or similarly significantly affects it. This right shall not apply if the decision is: necessary for the conclusion or performance of the contract between the person concerned and the operator; authorized by European Union law or by the law of the Slovak Republic and also law which provides for appropriate measures guaranteeing the protection of the rights and freedoms and legitimate interests of the data subject; based on the person's explicit consent.

- **Right to withdraw consent (Article 7 of the Regulation; Section 14 (3) of the Act)**

Where the processing of personal data is based on the consent of the data subject, the data subject shall have the right to withdraw his consent at any time. Consent may be withdrawn in the same way as consent was granted. At the same time, the person concerned may also withdraw his / her consent in the following ways:

- by e-mail to: helpdesk@hotspotzavar.sk
- by sending a written request to the address of the operator's registered office.

- **Right to initiate proceedings on protection of personal data (Articles 77 and 79 of the Regulation; Section 100 of the Act)**

If the person concerned considers that the processing of his / her personal data is in the contradiction with Regulation and Act, it has the right to file with the Office for the Protection of Personal Data, with its registered office at Hraničná 12, 820 07 Bratislava, Slovak Republic, IČO: 36 064 220 (hereinafter referred to as the 'Office') or any other competent authority, in particular in the Member State of its habitual residence, the place of employment or the place of the alleged infringement; protection of personal data. The petition to initiate proceedings (hereinafter referred to as "*petition*") must include: name, surname, correspondence address and signature of the petitioner, indication of the person against whom the petition is directed, indicating the name, surname, permanent address or name, registered office and identification number, if assigned, the subject-matter of the designation of the rights to be infringed in the processing of personal data, the evidence in support of the claims made in the application, a copy of the document or other evidence proving the exercise of the right under second part of Title II of this law or regulation, if such a right has been exercised by the person concerned or indication of the reasons worthy of special consideration of the non-exercise of the right in question, if the claim was made by the person concerned. A model proposal for initiation of proceedings before the Office is published on the Office's website.

- **Notification of personal data breach to the data subject (Art. 34 of the Regulation; § 40 of the Act)**

In the case of a personal data breach which is likely to result in a high risk to the rights and freedoms of natural persons, the operator shall notify the data subject of the personal data breach without undue delay. The notification to the data subject shall contain a clear and simple description of the nature of the personal data breach, the name and contact details of the responsible person or other contact point where more information can be obtained, a description of the likely consequences of the personal data breach, a description of the actions taken or proposed by the operator to remedy the infringement protection of personal data, including, where appropriate, measures to mitigate its potential adverse consequences. Notification to the data subject is not required if any of the following conditions is met: the operator has taken appropriate technical and organizational safeguards and has applied those measures to the personal data concerned by the personal data breach, in particular those under which personal data are unreadable to all persons who are not authorized to access them, such as encryption; the operator has taken follow-up measures

to ensure that the high risk to the rights and freedoms of the persons concerned is unlikely to have consequences; this would require disproportionate efforts. In such a case, instead of that the public is informed or a similar measure is taken, thereby ensuring that the persons concerned are informed in an equally effective way.

The way to exercise the right of the person concerned

The person concerned may assert his rights under Art. 15-22 of the Regulation and § 21-28 of the Act by submitting an application:

- by e-mail to: helpdesk@hotspotzavar.sk
- by sending a written request to the address of the operator's registered office.

The operator shall facilitate the exercise of the data subject's rights. If the operator has reasonable doubts as to the identity of the natural person making such a request, he may request the provision of additional information necessary to confirm the identity of the data subject. If the data subject's requests are manifestly unfounded or disproportionate, in particular because of their recurring nature, the operator may request a reasonable fee, taking into account the administrative costs of providing the information or notifying or taking action, or refusing to act upon the request. Otherwise information, according to Art. 13 and 14 of the Regulation (§ 19 and § 20 of the Act) and notices and measures adopted pursuant to Art. 15 to 22 and Art. 34 Regulations (§ 21 to § 28 and § 40 of the Act), will be provided free of charge. The operator shall provide the data subject with information on the measures adopted following a request under Art. 15 to 22 of the Regulation (Articles 21 to 28 of the Act), without undue delay and in any case within one month of receipt of the request. That period may be extended, if necessary, for a further two months, taking into account the complexity of the application and the number of applications. The operator shall inform the person concerned of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the person concerned has made the request by electronic means, the information shall, where possible, be provided by electronic means, unless the person concerned has requested a different method. If the operator fails to take action at the request of the data subject, he shall promptly and within one month of receipt of the request inform the data subject of the reasons for the non-action and of the possibility of making a complaint to the supervisory authority and enforcing the judicial remedy.