

1. IDENTIFICATION OF THE OPERATOR AND GENERAL INFORMATION

This notice on the processing of personal data (hereinafter referred to as the "**Policy**") contains information about the processing of your personal data by **ProfiDeCon Slovakia s.r.o.** 100/B, 831 04 Bratislava - Nové Mesto, ID No.: 52 447 316, registered in the Commercial Register of the District Court Bratislava I, Section: Sro, Insert No.: 137688/B (hereinafter referred to as the "**Controller**" or as "**we**" in the corresponding grammatical form), which occurs in the course of the performance of advocacy and commercial and entrepreneurial activities of the Controller in relation to its business partners, customers or other persons who contact the Controller. In addition, your personal data is also processed in accordance with the Code of Conduct for the processing of personal data by attorneys, which has been adopted by the Slovak Bar Association and which is binding on every attorney. The text of this Code can be found on the website of the Slovak Bar Association here: www.sak.sk/gdpr.

Through this Policy, the Controller provides you with information on why your personal data is processed, how it is processed, how long the Controller stores it, what your rights are in relation to the processing of your personal data and other relevant information on the processing of your personal data in the above cases. Through this Policy, the Controller fulfils its information obligation towards all data subjects both in the case where the Controller has obtained personal data directly from you as a data subject and in the case where the Controller has obtained your personal data from another source.

The Controller processes your personal data in accordance with Regulation 2016/679 of the European Parliament and of the Council of the European Union on the protection of natural persons 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) (hereinafter referred to as the "**Regulation**"), the relevant Slovak legislation, in particular Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments and Additions to Certain Acts (hereinafter referred to as the "**Act**") and other regulations on the protection of personal data (the *Regulation*, the *Act* and other regulations on the protection of personal data are hereinafter collectively referred to as the "**Personal Data Protection Regulations**").

You can contact the Controller in matters relating to the processing and protection of personal data at **ProfiDeCon Slovakia s.r.o.**, Vajnorská 100/B, 831 04 Bratislava - Nové Mesto district or by e-mail to the following email address: info@profidecon.com. In relation to the purpose of processing: **responding to messages and handling inquiries/ requests from messages received via E-mail communication, contact form or via messages on social networks**, we are a joint Controller with **ProfiDeCon s.r.o.** 51 895 986, registered in the Commercial Register of the District Court Bratislava I, Section Sro, Insert No.: 132571/B. **ProfiDeCon s.r.o.**, Vajnorská 100/B, 831 04 Bratislava - Nové Mesto district.

You can contact the Controller at the above contact addresses in case of any questions regarding the processing of your personal data.

2. THE CATEGORIES OF PERSONAL DATA PROCESSED, THE PURPOSES, THE LEGAL BASES FOR PROCESSING AND THE RETENTION PERIOD OF YOUR PERSONAL DATA

The Controller processes your personal data **in accordance with the principle of minimisation** so that it can fulfil the concluded contracts, legal obligations, process personal data for which it has a legitimate interest or process your personal data for which you have given your consent. **The Controller shall only ever request from you personal data which is necessary for the specific purpose of processing.**

The Controller shall only process your personal data for justified purposes, for a limited period of time and using the maximum possible level of security. **The Controller shall only process personal data if there is a legal basis for the processing (in accordance with the principle of lawfulness).** The Controller shall only ever retain personal data for the period of time for which it is necessary to retain the personal data, which is either determined by the Controller in accordance with the principle of minimisation or is based on the provisions of the relevant legislation). After the expiry of this period, the Controller shall delete the personal data, unless otherwise provided for in the relevant legislation (e.g. in the area of archiving).

The Controller only processes your personal data if:

- ❖ **necessary for the performance of a contract concluded with the Controller or for the implementation of measures prior to its conclusion (so-called pre-contractual relations) (the legal basis is Article 6(1)(b) of the Regulation).** In the performance of the contract, your personal data may be processed for the following purposes:
 - **Performance of contractual obligations (based on contracts with customers, suppliers of goods and services, other business partners in the capacity of natural persons) and implementation of pre-contractual relations.** For this purpose, we process your personal data in the following scope: first name, surname, business name, address of residence / place of business, ID number, VAT number, VAT number, registration in the register, contact details (phone number, e-mail), bank connection. Your personal data will be processed for this purpose for the duration of the contractual relationship and after its termination until the full settlement of contractual and other claims arising from the contractual relationship.

- **Fulfilling contractual obligations under relocation and immigration consultancy service contracts according to the needs of the client, providing relocation services, providing destination services and implementing pre-contractual relationships.** For this purpose, we process your personal data in the following scope: name and surname, maiden name, status, marital status, gender, place and date of birth, nationality, contact details: residence address, temporary residence address, or address where the person is temporarily staying/stayed, and correspondence address, e-mail and telephone number. , details of education and academic degree, work experience, job title, salary, social security number (birth number), bank account number, date of birth, identity card or passport number, residence permit number (including date of issue and period of validity of the identity card or passport and residence permit), personal data mentioned in the residence certificate, in the proof of receipt of benefits, tax class, religion, place of work, sector in which you work, tax number assigned, identification number, address of the office and warehouse in the home and host country, - categories of personal data are based on the relevant legislation governing the particulars of the documents which are the subject of the provision of services (in particular Law No. 404/2011 Coll. on the residence of foreigners and on amending and supplementing certain laws, as amended). Your personal data will be processed for this purpose during the duration of the contractual relationship and after its termination until the expiry of the statutory limitation periods or until the full settlement of contractual and other claims arising from the contractual relationship, whichever is earlier.
- **Performance of contractual obligations under service contracts with internal suppliers (contractors).** For this purpose, we process your personal data in the following scope: first name, surname, business name, address of residence / place of business, ID number, VAT number, VAT number, registration in the register, contact details (phone number, e-mail), bank connection. Your personal data will be processed for this purpose for the duration of the contractual relationship and after its termination until the full settlement of contractual and other claims arising from the contractual relationship.
- ❖ **necessary for compliance with the legal obligations of the Controller (the legal basis is Article 6(1)(c) of the Regulation).** In the performance of their legal obligations, your personal data may be processed for the following purposes:
 - **Processing of accounting documents.** For this purpose, we process your personal data in the following scope: name, surname, address, place of residence/place of business, contact details, bank account details, details of purchases made and other data on accounting documents. Your personal data will be processed for this purpose for a period of 10 years following the year to which it relates;
 - **Handling complaints and keeping records of complaints filed.** For this purpose, we process your personal data within the scope of normal personal data. Your personal data will be processed for this purpose for 3 years from the date of the claim if the claim is made by a natural person and for 4 years from the date of the claim if the claim is made by a legal entity;
 - **Handling of exercised rights and requests of data subjects under the Regulation (e.g. request for access, withdrawal of consent, etc.).** For this purpose, we process your personal data in the following scope: *ordinary personal data*. Your personal data will be processed for this purpose until the rights exercised have been fulfilled within the time limits laid down by the Regulation.
 - **Verification of whistleblowers' complaints.** For this purpose, we process your personal data in the following scope: *routine personal data necessary for the performance of legal obligations*. Your personal data will be processed for this purpose for a period of 120 days from the receipt of the complaint or until the complaint is resolved.
 - **Recording of whistleblowers' complaints.** For this purpose, we process your personal data in the following scope: *routine personal data necessary for the performance of legal obligations*. Your personal data will be processed for this purpose for 3 years from the date of termination of whistleblower protection pursuant to Section 8 of Act No. 54/2019 Coll. on the Protection of Whistleblowers of Anti-Social Activity and on Amendments and Additions to Certain Acts.
 - **Conduct of judicial and administrative proceedings.** For this purpose, we process your personal data to the following extent: *routine personal data necessary for the performance of legal obligations*. Your personal data will be processed for this purpose for the duration of the relevant proceedings and until the expiry of limitation periods (unless otherwise provided for in the relevant legislation).
 - **Screening of the terms and conditions of employment of service and work contractors to assess whether the service and work contractor is in breach of the prohibition on illegal employment.** For this purpose, we process your personal data in the following scope: *personal data necessary for the Controller to check whether the service or work supplier does not violate the prohibition of illegal employment pursuant to Section 7b(6) of Act No. 82/2005 Coll. on illegal work and illegal employment and on amendment and supplementation of certain acts, as amended*. Your personal data will be processed for this purpose for 5 years following the year to which it relates.
 - **Registry management, registration and handling of incoming and outgoing mail (including electronic communication with the relevant institutions).** For this purpose, we process your personal data within the following scope: *the usual personal data provided in the application*. Your personal data will be processed

for this purpose in the case of mail - for 5 years following the year to which it relates, other records constituting the register in accordance with the relevant provisions of Act No 395/2002 Coll. on archives and registers and on the amendment of certain acts, as amended.

- **Practice of advocacy, registration of court and administrative proceedings.** For this purpose, we process your personal data in the following scope: *routine personal data necessary for the performance of legal obligations*. Your personal data will be processed for this purpose for the duration of the relevant proceedings and until the expiration of limitation periods (unless otherwise provided for in the relevant legislation). The pursued legitimate interest of the Controller consists in particular in the preparation of an offer of legal services at the request of the client, the representation of clients in proceedings before courts, public authorities and other entities, the defence in criminal proceedings, the provision of legal advice to clients, the drafting of legal opinions and analyses, the drafting of deeds of legal transactions, communicating with clients and other individuals regarding the practice of law or the contractual relationship with the client, seeking evidence in favour of the client, establishing the identity of the persons concerned by means of witnesses, statements or other documentary evidence, authorising contracts, including seeking information about persons who may be harmed by the conclusion of the contract, carrying out conversion and guaranteed conversion, keeping records of the time, acts and advice given to the client, keeping the lawyer's files, including administrative activities related to the provision of legal and other services, fulfilling obligations to protect against money laundering (identification of suspicious transactions), dealing with the rights of data subjects, making entries in the commercial register, the trade register and other relevant registers and maintaining the list of end-users of benefits, fulfilling obligations in relation to the Controller's shareholders and managing directors (payment of profit shares, notification of the general meeting, etc.). For this purpose, we also process records of the time, acts and legal services provided, the maintenance of the lawyer's file, including administrative activities related to the provision of legal and other services, the fulfilment of obligations in the registration of legal trainees, the fulfilment of obligations to process personal data for statistical purposes, archival purposes in the public interest and for historical and scientific research purposes, the fulfilment of obligations in the protection against the laundering of the proceeds of crime.
- ❖ **Necessary for the purposes of the legitimate interests of our company as a Controller (legal basis is Article 6(1)(f) of the Regulation).** On the basis of this legal basis, your personal data is processed for the following purposes:
 - **Registration of representatives (contact persons) of suppliers, customers and other business partners as legal persons, business communication with representatives of business partners and fulfilment of other contractual obligations in contracts concluded with legal persons.** The pursued legitimate interest of the Controller consists in the necessity of registering representatives and contact persons of business partners in the capacity of legal persons for the purposes of accounting, ensuring internal control activities, fulfilling contractual obligations towards legal persons and for the enforcement of legal and other claims arising from concluded contracts. For this purpose, we process your personal data in the following scope: *common personal data (first name, surname, business name, address of residence / place of business, ID number or other unmistakable identification data, contact data - telephone number, email address, bank connection, affiliation to the company of the business partner), data on the contractual relationship - the scope of services provided, etc.* For this purpose, we process your personal data for the duration of the contractual relationship with the legal entity and after its termination until the expiry of the relevant limitation periods (for the purpose of enforcing legal claims arising from concluded contracts) or until the termination of the status of the natural person as a representative or contact person of the partner - legal entity, if further processing of personal data after the termination of this status is not necessary for the stated purpose.
 - **Records of exercised rights of data subjects.** The pursued legitimate interest of the Controller consists in the recording of the exercised rights of data subjects for the purpose of demonstrating compliance with the obligations arising from the legislation. For this purpose, we process your personal data for a period of 5 years from the date of processing of the exercised rights and the personal data processed are the personal data that are the subject of your request.
 - **Business communication with representatives of business partners and fulfilment of other contractual obligations in contracts concluded with legal entities.** The pursued legitimate interest of the Controller lies in the need to ensure and agree on the conditions and details of the fulfilment of the contractual obligations of the Controller in contractual relations with legal entities. For this purpose, we process your personal data for the duration of 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 limitation periods specified in the relevant legislation (as a rule, 5 years following the year of termination of the contractual relationship), and in the case of data subjects - representatives of legal entities for the duration of the contractual relationship with the legal entity or until the termination of the status of the data subject as a representative of the legal entity - business partner.
 - **Responding to messages and handling queries/requests from messages received via Email communication, contact form, via social media messages or by phone.** For this processing purpose, we are the Controller together with the company: **ProfiDeCon Ltd. 51 895 986**, registered in the Commercial

Register of the District Court Bratislava I, Section: Sro, Insert No.: 132571/B. The pursued legitimate interest of the Controller consists in responding to received messages and inquiries for the proper conduct of business communication and providing information about the activities of the Controller. For this purpose, we process your personal data for a period of 60 days from the date of receipt of the request or until the request is processed (fulfilment of the purpose), whichever is earlier.

- **Sending information about the Controller's activities and its own services (direct marketing to existing and former customers).** The pursued legitimate interest of the Controller consists in keeping the existing clientele and informing them about the Controller's current services. For this purpose, we process your personal data for 3 years from the date of service provision or until you unsubscribe, whichever comes first.
- ❖ **On the basis of your consent** (the legal basis is Article 6(1)(a) of the Regulation). On the basis of this legal basis, your personal data is processed for the following purposes:
 - **Processing of special categories of personal data for the purpose of providing the service (health data, data on the nationality of the data subject and data relating to guilty pleas for criminal offences and misdemeanours in the provision of relocation and immigration services).** For this purpose, we process your personal data in the following scope: *data on health, nationality and data relating to the recognition of guilt for crimes and offences (special categories of personal data) required by the relevant legislation necessary for the proper provision of the service (in particular Act No. 404/2011 Coll. on the residence of foreigners and on amending and supplementing certain laws, as amended).* Your personal data will be processed for this purpose during the duration of the contractual relationship and after its termination until the expiry of the statutory limitation periods or until the full settlement of contractual and other claims arising from the contractual relationship, whichever is earlier.

In connection with the security of personal data, the Controller has adopted the relevant internal documentation specifying the appropriate security measures adopted by the Controller for the purpose of securing your personal data.

3. SOURCE OF PERSONAL DATA

The Controller obtains your personal data directly from you as the data subject, if you provide it to the Controller yourself (when sending a message to the e-mail address provided on the website, when visiting the Controller's website or when entering into a contractual relationship with the Controller). **In some cases**, in particular if a **commercial company or other entity of which you are an agent or contact person** orders a service from the Controller, it is this entity that is the source of your personal data.

❖ If you are a client of the Controller

If you are a client of the Controller, the Controller collects your personal data primarily from you. The provision of your personal data is entirely voluntary, but in some cases it is necessary in order for the Controller to provide you with legal services in accordance with Act No. 586/2003 Coll. on Advocacy, as amended (hereinafter referred to as the "*Advocacy Act*"). In exceptional cases, failure to provide your personal data may result in the refusal to provide legal services.

In some cases, the Controller obtains your personal data from sources other than you, for example from public authorities, publicly available sources or other persons.

❖ If you are not a client of the Controller

If you are not a client of the Controller, the Controller obtains your personal data mostly directly from its clients, from public sources or from public authorities (e.g. if you are a counterparty in proceedings). In this case, the Controller may also obtain your personal data against your will (and on the basis of the legal authorisation and obligation to practise law and provide legal services in accordance with the Law on Advocacy).

In some cases, if you do not provide your personal data to the Controller, the Controller would not be able to deliver the service to you, enter into a contract with you and fulfil its other legal and contractual obligations.

4. TO WHOM DOES THE CONTROLLER PROVIDE YOUR PERSONAL DATA?

In certain cases, the Controller is obliged to provide your personal data to public authorities that are authorised under the relevant legislation to process your personal data, e.g. courts, law enforcement authorities, the competent tax authorities when keeping prescribed accounting records or to experts and entities providing expert examination of defects of goods in the event of your complaint, as well as to professional entities such as lawyers, notaries or tax advisors (who are bound by the obligation of confidentiality).

The Controller also provides your personal data to its **processors**, i.e. external entities that process your personal data on behalf of the Controller. The processors 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 process your personal data securely. The Controller's processors include:

- **a company providing website hosting services, including mail hosting services,**
- **a company providing bookkeeping services,**

- **company providing service and maintenance of the Controller's internal system,**
- **a company providing CRM software and a service for recording actions.**

5. TRANSFER TO THIRD COUNTRIES AND INTERNATIONAL ORGANISATIONS AND PROFILING

The processing of your personal data for the above purposes does not involve the transfer of your personal data to third countries or international organisations.

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 whereby your personal aspects are evaluated, with the exception of the creation of your online preference profiles via cookies if you have given your verifiable consent to their use.

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

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

- **Right of access** - As a data subject, you have the right to obtain confirmation from the Controller as to whether it is processing your personal data and, if so, to obtain access to that personal data and information pursuant to Article 15 of the Regulation. The Controller will provide you with a copy of the personal data that is being processed. If you make a request by electronic means, the information will be provided to you by the Controller in a commonly used electronic format, unless you request otherwise.
- **Right to rectification** - To ensure the accuracy, completeness and timeliness of your personal data, the Controller has taken reasonable measures. As a data subject, you have the right to have your inaccurate personal data corrected or your incomplete personal data completed by the Controller without undue delay.
- **Right to restriction of processing** - 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 challenge 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 the purposes of processing but you need it to prove, exercise or defend legal claims. The Controller will restrict the processing of your personal data if you request it.
- **Right to data portability** - In certain circumstances, you have the right to have your personal data transferred to another data controller that you designate. However, the right to portability only applies 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 where the Controller processes personal data by automated means.
- **Right to erasure ("right to be forgotten")** - You also have the right to obtain from the Controller the erasure of your personal data without undue delay if certain conditions are met, for example, if the personal data are no longer necessary for the purposes for which they were collected or processed by the Controller. However, this right of yours must be considered on a case-by-case basis, as there may be situations where the Controller is prevented from erasing your personal data by other circumstances (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 to erase your personal data.
- **Right to lodge a complaint or complaint** - **If you feel that** your personal data is being processed in violation of applicable law, you may lodge a complaint with the supervisory authority, which is the **Office for Personal Data Protection of the Slovak Republic**, located at Hraničná 12, 820 07 Bratislava 27; website: dataprotection.gov.sk, phone number: 02 3231 3214; e-mail: statny.dozor@pdp.gov.sk.

RIGHT TO OBJECT - You have the right to object to the processing of your personal data, for example, if the Controller processes your personal data on the basis of a legitimate interest or in the case of processing involving profiling. If you object to such processing of your personal data, the Controller will not further process your personal data unless it demonstrates the necessary legitimate grounds for further processing of your personal data.

RIGHT TO WITHDRAW CONSENT - If the Controller processes your personal data on the basis of your consent, you have the right to withdraw the consent at any time in the same way as you gave it. Withdrawal of consent does not affect the lawfulness of the processing carried out prior to the withdrawal of consent. Upon withdrawal of consent, the Controller will cease to process your personal data.

You can exercise your rights specified in the table above at the contact addresses of the Controller listed at the beginning of this document. The Controller will provide you with a response to the exercise of your rights free of charge. In the event of a repeated, unfounded or unreasonable request to exercise your rights, the Controller is entitled to charge a reasonable fee for the provision of the information. The Controller will provide you with a reply within 1 month from the date on which you exercised your rights. In certain cases, the Controller is

entitled to extend this period, in the event of a high number and complexity of requests from data subjects, but not more than 2 months. The Controller will always inform you of the extension of the time limit.

7. VALIDITY

This updated Policy is valid and effective as of 1.12.2022. As it may be required to update the personal data processing information contained in this Policy in the future, the Controller is entitled to update this Policy at any time. However, in such a case, the Controller will notify you in advance in an appropriate manner.