

PRIVACY NOTICE

1. Who are we?

The controller of your personal data is PDCS, o.z., with its registered office at Štúrova 24/13, 811 02 Bratislava-Staré Mesto, Slovak Republic, Company ID (IČO): 31782451, Registration No.: VVS/1-900/90-12629, registered with the District Office Bratislava (hereinafter referred to as the "Controller" or "we").

When processing your personal data, we comply 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 the "GDPR") and with the applicable provisions of Act No. 18/2018 Coll. on Personal Data Protection and on Amendments to Certain Acts (hereinafter the "Personal Data Protection Act").

2. How can you contact us?

You may exercise your rights by email or by post through our contact person¹:

- E-mail: pdcsc@pdcsc.sk
- Postal address: Štúrova 24/13, 811 02 Bratislava-Staré Mesto, Slovak Republic

If you have any questions, you may also contact us by telephone:

+421 2 5292 5016

¹ The contact person is not the Data Protection Officer.

3. Why do we process personal data (for what purposes) and on what legal basis?

Purpose of processing	Legal basis	Relevant legislation ²
Publication of photographs of the Controller's officers on the Controller's website (to introduce the Controller's team to the public)	Article 6(1)(a) GDPR	—
Preparation of minutes of meetings of the Controller's governing bodies	Article 6(1)(f) GDPR	—
Registration of data and any changes thereto in the Register of Non-Governmental Non-Profit Organisations	Article 6(1)(c) GDPR	Act on the Register of Non-Governmental Non-Profit Organisations; Act on the Association of Citizens
Preparation and publication of annual reports	Article 6(1)(f) GDPR	—
Performance of pre-contractual and contractual obligations (other than employment relationships)	Article 6(1)(b) GDPR	Civil Code; Commercial Code

Purpose of processing	Legal basis	Relevant legislation ²
Recruitment and pre-employment procedures	Article 6(1)(b) GDPR	Labour Code
Fulfilment of employer's legal obligations	Article 6(1)(c) GDPR; Article 9(2)(b) GDPR	Labour Code; Social Insurance Act; Health Insurance Act; Income Compensation Act; Old-Age Pension Savings Act; Supplementary Pension Savings Act; Occupational Health and Safety Act
Compliance with occupational health and safety obligations (including maintaining records of accidents involving persons who are not employees of the Controller)	Article 6(1)(c) GDPR; Article 9(2)(f) GDPR	Occupational Health and Safety Act
Ensuring the performance of contractual obligations, provision of our services and cooperation with contractual partners (including the exchange and, where appropriate, publication of contact details)	Article 6(1)(f) GDPR	—
Publication of photographs of external collaborators on the Controller's website (to introduce the Controller's team to the public)	Article 6(1)(a) GDPR	—
Protection of legal rights and legally protected interests	Article 6(1)(f) GDPR; Article 9(2)(f) GDPR	Civil Code; Commercial Code; Criminal Code; Code of Criminal Procedure; Civil Litigation Code; Civil Non-Contentious Procedure Code; Administrative Judicial Code; Administrative Procedure Code; Minor Offences Act; Enforcement Code
Maintaining records of volunteers	Article 6(1)(f) GDPR	Act on Volunteering
Attendance records	Article 6(1)(f) GDPR	Labour Code
Informing the public about the Controller's activities by sending electronic newsletters	Article 6(1)(a) GDPR	Electronic Communications Act
Promotion and presentation of the Controller's activities through photographs and video recordings and their publication	Article 6(1)(f) GDPR	—

Purpose of processing	Legal basis	Relevant legislation ²
on the Controller's website, in printed materials and on social media (Facebook, Instagram, YouTube and LinkedIn)		
Preparation of statistics (for the purpose of improving our services and increasing demand for the services we provide)	Article 6(1)(f) GDPR	–
Accounting and tax purposes	Article 6(1)(c) GDPR	Accounting and tax legislation
Demonstrating the implementation of events and other activities organised or co-organised by the Controller	Article 6(1)(f) GDPR	–
Handling requests submitted by data subjects under the GDPR	Article 6(1)(c) GDPR; Article 9(2)(f) GDPR	GDPR
Records management	Article 6(1)(c) GDPR; Article 9(2)(f) GDPR	Act on Archives and Records Management

² The list of relevant legislation is illustrative only.

Explanation of the legal bases

Article 6(1) GDPR

- (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- (b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- (c) processing is necessary for compliance with a legal obligation to which the Controller is subject;
- (f) processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.

Article 9(2) GDPR

- (b) processing is necessary for carrying out the obligations and exercising specific rights of the Controller or the data subject in the field of employment and social security and social protection law;
- (f) processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

Overview of processing purposes

The processing purposes relate primarily to the following categories of data subjects:

	• the Controller's officers;
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	the Controller's employees, contractual partners, their employees or subcontractors, and persons having another legal relationship with the Controller (e.g. liability for damages);
	natural persons in connection with the Controller's promotional (marketing) activities and activities aimed at improving and presenting the Controller's work;
	other specific purposes of processing personal data.

Note: The categories of data subjects relating to each processing purpose are specified in greater detail in the Record of Processing Activities (see Section 11).

List of abbreviations

GDPR – 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)

Personal Data Protection Act – Act No. 18/2018 Coll. on Personal Data Protection and on Amendments to Certain Acts

Civil Litigation Code – Act No. 160/2015 Coll.

Civil Non-Contentious Procedure Code – Act No. 161/2015 Coll.

Civil Code – Act No. 40/1964 Coll.

Commercial Code – Act No. 513/1991 Coll.

Criminal Code – Act No. 300/2005 Coll.

Code of Criminal Procedure – Act No. 301/2005 Coll.

Labour Code – Act No. 311/2001 Coll.

Act on Archives and Records Management – Act No. 395/2002 Coll.

Administrative Judicial Code – Act No. 162/2015 Coll.

Administrative Procedure Code – Act No. 71/1967 Coll.

Minor Offences Act – Act No. 372/1990 Coll.

Enforcement Code – Act No. 233/1995 Coll.

Foundations Act – Act No. 34/2002 Coll.

Occupational Health and Safety Act – Act No. 124/2006 Coll.

Act on Volunteering – Act No. 406/2011 Coll.

Act on the Register of Non-Governmental Non-Profit Organisations – Act No. 346/2018 Coll.

Act on the Association of Citizens – Act No. 83/1990 Coll.

Social Insurance Act – Act No. 461/2003 Coll.

Health Insurance Act – Act No. 580/2004 Coll.

Income Compensation Act – Act No. 462/2003 Coll.

Old-Age Pension Savings Act – Act No. 43/2004 Coll.

Supplementary Pension Savings Act – Act No. 650/2004 Coll.

Electronic Communications Act – Act No. 452/2021 Coll.

4. What legitimate interests do we pursue when processing personal data?

Where we process personal data on the basis of our legitimate interests, these interests include:

- protecting and defending our legal claims, or the legal claims of others (for the purpose of protecting legal rights and legally protected interests);
- ensuring the proper performance of contractual relationships (for the purpose of ensuring the performance of contractual obligations, provision of our services and cooperation with contractual partners, including the exchange or publication of contact details);
- promoting and presenting our activities (for the purpose of promoting and presenting the Controller's activities through photographs and video recordings published on our website, in printed materials and on social media (Facebook, Instagram, YouTube and LinkedIn));
- documenting the fulfilment of our contractual obligations and the implementation of activities and events that have received financial or other support (for the purpose of demonstrating the implementation of events and other activities organised or co-organised by the Controller);
- maintaining accurate records of volunteers (for the purpose of maintaining records of volunteers);
- keeping records of the proceedings and outcomes of meetings of the Controller's governing bodies (for the purpose of preparing minutes of meetings of the Controller's governing bodies);
- recording employees' attendance at the workplace (for the purpose of attendance records);
- ensuring transparency of the Controller's activities and informing the public about our work, results and financial management (for the purpose of preparing and publishing annual reports);
- improving the quality of our services and increasing demand for the services we provide (for the purpose of preparing statistics).

5. What categories of personal data do we process?

Depending on the purpose of processing, we process different categories of personal data, including:

Standard personal data

For example:

- identification data;
- personal data contained in photographs and video recordings;

- contact details;
- national identification number (where required by law);
- date of birth;
- residential address;
- information contained in a curriculum vitae (CV);
- information relating to retirement benefits;
- bank account details;
- salary information.

Special categories of personal data

For example:

- information concerning employees' health, including temporary incapacity for work, pregnancy, occupational accidents and similar information.

We process health-related personal data only where necessary to fulfil our obligations under employment and social security legislation or where processing is necessary for the establishment, exercise or defence of legal claims.

6. From whom do we obtain personal data?

Most of the personal data we process is obtained directly from you, for example:

- when you contact us;
- when you act on behalf of another natural or legal person (for example, your employer);
- through registration forms relating to our activities and events; or
- when you subscribe to our newsletter.

We may also obtain personal data from other sources, for example:

- documentation provided to us by our contractual partners;
- recording devices;
- personal questionnaires completed by employees (for example, information relating to family members);
- publicly available sources; and
- public authorities.

7. Are you required to provide us with your personal data?

If you wish to participate in one of our activities or events, or if you are (or wish to become) one of our contractual partners, the provision of most personal data is a contractual requirement or a requirement necessary for entering into a contract.

Providing such personal data is not mandatory. However, if you choose not to provide it, we may be unable to conclude a contract with you or enable you to participate in our activities or events.

If you wish to subscribe to our newsletter, providing your personal data is voluntary. However, without your personal data we will not be able to send you information about our activities.

If you are our employee or an applicant for employment, providing personal data is a contractual requirement and a prerequisite for entering into an employment relationship. Although providing such data is not voluntary in practice, failure to provide it may prevent us from concluding an employment contract or other work agreement with you and from fulfilling our legal obligations towards public authorities (such as health insurance companies, the Social Insurance Agency or tax authorities).

The provision of certain personal data before or during an employment relationship is also required by law, for example where information is necessary to report an occupational accident. Failure to provide such data may prevent us from complying with our legal obligations and may adversely affect your rights (for example, you may not become entitled to social insurance benefits to which you would otherwise be entitled if an occupational accident is not properly reported).

Where we process personal data in order to comply with our legal obligations, the provision of such personal data is a statutory requirement, and you are required to provide it.

Where we process your personal data on the basis of our legitimate interests, you have the right to object to such processing. In that case, we will assess whether we are entitled to continue processing your personal data in accordance with the GDPR.

8. With whom do we share your personal data?

We disclose your personal data only to the extent necessary for the relevant purpose.

Your personal data may be disclosed to our officers and to our processors, such as providers of occupational health and safety services or external accounting service providers.

If you are one of our suppliers or an employee of one of our suppliers, we may share your contact details with other persons (for example, our other contractual partners) where necessary to ensure the proper performance of contractual obligations.

In certain cases, we are required by law to disclose personal data to public authorities or other recipients, including, for example:

- the Office for Personal Data Protection of the Slovak Republic;
- tax authorities;
- the District Office Bratislava;
- the Social Insurance Agency; and
- health insurance companies.

If you are our employee, certain personal data may be disclosed or published where this is necessary for the performance of your work duties. In accordance with Section 78(3) of the Personal Data Protection Act, we may disclose your personal data, to the extent necessary, to our contractual partners or other third parties, for example:

- to register you for training courses or professional seminars; or
- to arrange accommodation in connection with a business trip.

We follow the same approach when processing the personal data of our officers in connection with the performance of their duties.

Accordingly, we may disclose your personal data, to the extent necessary, to our contractual partners for the purpose of ensuring the proper provision of our services and cooperation with contractual partners or, for example, for arranging accommodation in connection with your business travel.

We may also disclose your personal data to other recipients where necessary for the protection of legal rights and legally protected interests, such as lawyers, courts or judicial enforcement officers.

Where we process your personal data on the basis of our legitimate interests, you have the right to object to such processing. We will then assess whether we are entitled to continue processing your personal data in accordance with the GDPR.

9. Do we transfer personal data to a third country or an international organisation?

If you subscribe to our newsletter, the email address used for sending the newsletter may constitute personal data. In such cases, your personal data is provided to The Rocket Science Group LLC d/b/a Mailchimp, with its registered office at 675 Ponce De Leon Avenue, Northeast Suite 5000, Atlanta, GA 30308, USA (hereinafter referred to as "Mailchimp").

Mailchimp processes personal data in compliance with the GDPR. It has incorporated the EU Standard Contractual Clauses (SCCs) into its Data Processing Addendum, which forms part of its standard contractual terms with customers, including PDCS.

Further information about Mailchimp's processing and protection of personal data is available in its GDPR documentation.

Mailchimp's headquarters and servers are located in the United States. Consequently, personal data processed by Mailchimp may be transferred to, stored in or otherwise processed in the United States. In addition, Mailchimp uses third-party sub-processors whose servers may also be located outside the European Union or the European Economic Area.

More information about transfers of personal data outside the EU/EEA, including a complete list of Mailchimp's sub-processors, is available at:

<https://mailchimp.com/help/mailchimp-european-data-transfers/>

We also use Salesforce for preparing statistics aimed at improving our services and increasing demand for the services we provide.

For this purpose, personal data is provided to Salesforce, Inc., 415 Mission Street, 3rd Floor, San Francisco, CA 94105, USA.

Transfers of personal data to third countries are carried out on the basis of appropriate safeguards in accordance with Article 46 GDPR, in particular through the EU Standard Contractual Clauses, which form part of Salesforce's contractual documentation.

Further information about Salesforce's processing and protection of personal data is available in Salesforce's Privacy Information documentation ([Salesforce Privacy Information | Salesforce](#)).

10. Cookies

Our website uses Plausible Analytics.

Plausible is a privacy-friendly analytics service that does not process personal data and does not track individual users. Specifically, it does not use cookies, persistent identifiers or cross-site/cross-device tracking technologies.

11. How long do we retain personal data?

We retain personal data only for as long as is necessary for the purposes for which it is processed.

Personal data forms part of our records, which are retained for the retention periods specified under the Act on Archives and Records Management. These retention periods are established to ensure that records remain available for as long as they are required for our activities, including the time limits applicable to the enforcement of rights and fulfilment of legal obligations under applicable legislation.

The retention period begins on the first day of the calendar year following the year in which the file is closed (i.e. the file containing records relating to the same matter is completed).

If, at any time, you object to the processing of your personal data for direct marketing purposes (i.e. the sending of newsletters), we will cease processing your personal data for that purpose.

More detailed information about the retention periods applicable to particular categories of personal data is set out in our [Record of Processing Activities](#) and [Records Retention Schedule](#).

12. Do we carry out automated decision-making, including profiling?

No.

We do not carry out automated decision-making, including profiling.

13. What rights do you have in relation to the processing of your personal data?

You have a number of rights under the GDPR in relation to the processing of your personal data. The rights available to you depend on the purpose for which we process your personal data.

a) Right of access

You have the right to obtain confirmation as to whether we process your personal data. If we do, you have the right to access your personal data under the conditions laid down in the GDPR.

We will provide you with a copy of the personal data we process about you, provided that doing so does not adversely affect the rights and freedoms of others.

For any additional copies you request, we may charge a reasonable fee based on administrative costs.

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

b) Right to rectification

You have the right to have inaccurate personal data concerning you corrected without undue delay.

Taking into account the purposes of the processing, you also have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

c) Right to erasure ("right to be forgotten")

Under certain circumstances, you have the right to have your personal data erased without undue delay if:

- the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- you withdraw your consent where processing is based on consent and there is no other legal basis for the processing;
- you object to the processing of your personal data based on legitimate interests and there are no overriding legitimate grounds for the processing, or you object to processing for direct marketing purposes;
- the personal data has been processed unlawfully;
- the personal data must be erased to comply with a legal obligation under European Union law or the law of the Slovak Republic;
- the personal data was collected in relation to the offer of information society services to a child.

The right to erasure does not apply where processing is necessary, for example, for compliance with a legal obligation under European Union or Slovak law or for the establishment, exercise or defence of legal claims.

d) Right to restriction of processing

You have the right to obtain restriction of processing where one of the following applies:

- you contest the accuracy of your personal data, for a period enabling us to verify its accuracy;
- the processing is unlawful and you oppose the erasure of your personal data, requesting instead the restriction of its use;
- we no longer need the personal data for the purposes of processing, but you require it for the establishment, exercise or defence of legal claims;
- you have objected to processing based on legitimate interests, pending verification of whether our legitimate grounds override yours.

Where processing has been restricted, your personal data may, with the exception of storage, only be processed:

- with your consent;
- for the establishment, exercise or defence of legal claims;
- for the protection of the rights of another natural or legal person; or
- for reasons of important public interest of the European Union or the Slovak Republic.

e) Right to data portability

You have the right to receive your personal data in a structured, commonly used and machine-readable format and to transmit that data to another controller where:

- the processing is based on your consent or on a contract; and
- the processing is carried out by automated means.

The exercise of this right must not adversely affect the rights and freedoms of others.

f) Right to object

You have the right to object at any time to the processing of your personal data where such processing is based on our legitimate interests.

In such a case, we will no longer process your personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or unless the processing is necessary for the establishment, exercise or defence of legal claims.

Where 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 purposes, including profiling insofar as it is related to direct marketing.

If you object to processing for direct marketing purposes, your personal data will no longer be processed for those purposes.

In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, you may exercise your right to object by automated means using technical specifications.

g) Right to withdraw consent

Where processing is based on your consent, you have the right to withdraw your consent at any time.

Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal of consent.

h) Right to lodge a complaint

You have the right to lodge a complaint at any time with the Office for Personal Data Protection of the Slovak Republic.

14. Further information on the processing of personal data

More detailed information about the categories of personal data we process, the categories of data subjects and recipients, and other information relating to our processing activities is contained in our Record of Processing Activities (see Section 11).

15. Changes to this Privacy Notice

The protection of personal data is an ongoing responsibility.

The information that we are required to provide regarding our processing of personal data may change from time to time or become outdated. We therefore reserve the right to amend or update this Privacy Notice at any time.

Where we make significant changes to this Privacy Notice, we will draw your attention to those changes, for example by publishing a general notice on our website or, where appropriate, by notifying you by email.