

Purpose of your personal data processing

Dealing with notifications about breaches of personal data protection and communication with the supervisory authority

Who are data subjects for this processing purpose (whose personal data do we process)?

Data subjects are:

- data subjects affected by the processing of personal data by the Company (i.e. particularly employees and incumbents of the Company, Company's shareholders, and other persons in the shareholder or control structure of the Company, contractors and other entities cooperating with the Company, any persons entering the Company premises etc.),
- persons notifying about a personal data breach to the Company,
- employees of the supervisory authority, who communicate with the Company,
- Company's employees, who communicate with the data subjects and with the supervisory authority.

What categories of personal data do we collect and process for this purpose?

For this purpose, we collect and process the following personal data categories:

- identification data,
- contact details,
- data, which are subject to a personal data breach,
- data, that the Company processes for due processing of personal data breach notifications,
- data, that the Company processes for due providing of cooperation to the supervisory authority in performance of its tasks.

What authorizes us for such processing of your personal data (so called legal basis)?

The legal basis for processing your personal data consists in a legal obligation of the Company.

The legal obligation of the Company to process your personal data results from the following legal regulations:

- Articles 5, 31, 33, 34, 36, and 37 of the Regulation of the European Parliament and EU Council 2016/679 (GDPR),
- Articles 12, 40, 41, 43, 44, 94, and 109 of Act No. 18/2018 Coll. On Personal Data Protection as later amended.

Special categories of personal data are only processed in cases, when a personal data breach, or communication with the supervisory authority, concerns the processing of such



data. In such case, the special categories of personal data are processed based on Art. 9 (2) (g) of the General Data Protection Regulation.

Data related to criminal convictions and offences are only processed in cases, when the personal data breach or communication with the supervisory authority concerns the processing of such data. In such case, we process data related to criminal convictions and offences based on art. 31, 33, 34, 36 of the General Data Protection Regulation, art. 94 or art. 109 of Act No. 18/2018 Coll. on Personal Data Protection as later amended.

To whom do we provide personal data (so-called data recipient)?

Data recipients are external legal and other expert consultants and the supervisory authority.

Does the processing of your personal data involve a transfer of your personal data to a third country or international organisation?

No

How long do we process personal data (so-called storage period)?

We process your personal data for the period of 5 years since receiving a personal data breach notification or, since terminating communication with the supervisory authority.

What are your rights as a data subject?

As a data subject, you have the following rights:

- the right to access,
- the right to rectification,
- the right to erasure ('right to be forgotten'),
- the right to restriction of personal data processing,
- the right to lodge a complaint with a supervisory authority,

Current contact details of the Office for Personal Data Protection of the Slovak Republic and further instructions for lodging such a complaint are provided on the website of the office www.dataprotection.gov.sk.

Further information on the scope of the above rights is provided on the Company's website: www.seas.sk/gdpr.

How to exercise your rights in the Company:

You can exercise your rights in our Company at any time in the following ways:

- in person, in the Company [headquarters](#);
- in writing, by sending the request in question to the [Company's address](#);

- Electronically – by email, by sending the request in question to the email address of the data protection officer to dpo@seas.sk.

Is provision of your personal data a statutory or contractual requirement or a requirement necessary to enter into a contract?

Provision of your personal data is a legal requirement. In case of not providing the data, the Company is not able to perform its obligations related to processing the data breach notifications and to providing cooperation with the supervisory authority.

Does the processing of your personal data involve automated individual decision-making, including profiling?

No