

## **PRINCIPLES OF PRIVACY AND PERSONAL DATA PROTECTION IN COMPANIES OF TMR GROUP**

(hereinafter referred to as „Conditions“)

Division:

Part 1. General: Who we are

Part 2. General part: Legal basis of personal data processing

Part 3. General part: Principles of personal data processing

Part 4. Individual information obligations.

- A. PRIVACY STATEMENT - Jobseekers
- B. PRIVACY STATEMENT TMR Group employees (including temporary employees, contractors, temporary workers and persons working on an employment basis, leasing employees or persons working on a similar basis)
- C. PRIVACY STATEMENT TMR Group - customers
- D. PRINCIPLES OF PERSONAL DATA PROTECTION (SUPPLIERS AND OTHERS)
- E. STATEMENT ON THE PROCESSING OF DATA FROM THE WEB ENVIRONMENT AND COOKIES TMR Group
- F. PRIVACY STATEMENT (Shareholders, partners, statutory bodies)
- G. RIGHTS OF THE PERSONS CONCERNED

### **Part 1**

Tatry mountain resorts plc, Demänovská dolina 72, 031 01 Liptovský Mikuláš, Company Registration Number: 31 560 636, registered with Commercial Registry of County Council Žilina File: Sa insert No 62/L is, together with other in terms of property, personnel and otherwise associated companies, a joint data controller at personal data processing within TMR Group.

**TMR Group members are:**

**Joint Operators under the Joint Operators Agreement entered into on 25. May 2018:**

#### **Tatry mountain resorts, a.s.**

Demänovská Dolina 72, 031 01 Liptovský Mikuláš

ID: 31 560 636

VAT ID: SK2020428036

Registered in the Commercial Register maintained by the Žilina District Court, section: Sa, Insert no.: 62/L

#### **EUROCOM Investment, s.r.o.**

136, 034 83 Bešeňová

ID: 35 756 985

VAT ID: SK2021394969

Registered in the Commercial Register maintained by the Žilina District Court, section: s.r.o., Insert no.: 14558/L

#### **MELIDA, a.s.**

Špindlerův Mlýn 281, 543 51 Špindlerův Mlýn, Česká republika

ID: 241 66 511

VAT ID: CZ24166511

Registered in the Commercial Register maintained by the Court Hradci Králové, section: B, Insert no.: 3175

#### **SZCZYRKOWSKI OŚRODEK NARCIARSKI S.A**

Narciarska 10, 43-370 Szczyrk Polsko

IČO/Regon: 072818322

Zápísaná v Krajowy rejester sadowy, Sad Rejonowy Bielsku-Białe

Registered in the Krajowy rejester sadowy, Sad Rejonowy Bielsku-Białe no. KRS: 0000140818

#### **SLASKIE WESOŁE MIASTECZKO SPÓŁKA Z OGRANICZONA ODPOWIEDZIALNOSCIA**

ul. PLAC ATRAKCJI, nr.1 , 41 501 Chorzow, Poland

ID/Region: 243516267

Registered in the Katowice-Wschod Regional Court in Katowice no. KRS: 0000499958

#### **MÖLLTALER GLETSCHERBAHNEN GMBH & CO KG & HOCHGEBIRGSBAHNEN ANKOGEL**

Talstation, Innerfragrant 46, 9831 Flattach

Firmenbuchnummer 19797p

Company reg. No.: FN 19797 p

VAT reg. No.: AT U33329902

#### **TATRY MOUNTAIN RESORTS CR, A.S.**

Pobřežní 18/16, Karlín, 186 00 Praha 8, Česká republika  
ID/Region: 06871917  
Registered in: Spisová značka: B 23258 vedená u Městského soudu v Praze  
VAT reg. No.: CZ06871917

#### **TMR JEŠTĚD, A.S.**

Průmyslová 1472/11, Hostivař, 102 00 Praha 10, Česká republika  
ID/Region: 06080413  
Registered in: Spisová značka: B 2685 vedená u Krajského soudu v Ústí nad Labem  
VAT reg. No.: CZ06080413

In addition to the aforementioned joint operators, these terms also apply to other subsidiaries or other affiliated and managed companies:

- WORLD EXCO Ltd
- KORONA ZIEMI SP. Z O.O.
- Tatry mountain resorts PL- plc
- CAREPAR plc
- Hotel ALPINA Ltd
- HAMBRAND plc

#### **With what data does TMR Group work and why?**

1. Companies of TMR Group process identification data, contact data, the data of activities of their individual customers and the data of customers of loyalty card GOPASS and Smart season pass. TMR Group do not process any personal data of a special category except those which are necessary at settlement and adjustment of insured event, that is the data which relate to visitors' health.
2. Identification data and contact data are necessary for TMR because we need to ensure the conclusion and performance of contracts on provision of respective products and services with our customers. The data are also used when providing professional assistance and customer support and services.
3. For further information see respective parts of information obligations (part 4).
4. The legal definition of personal data is stated in 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) and national privacy regulation (hereinafter law). It is possible to identify a particular person using personal data. Personal data include in particular identification data and contact data.

#### **Identification data**

- name
- surname
- the date of birth
- birth certificate number
- identity card number
- passport number or the number of another identity document

For further information see the part on information obligations.

#### **Contact data**

- home address
- telephone numbers
- e-mail address
- the address on Facebook/google; in case that you have given your consent

For further information see the part on information obligations.

#### **Descriptive data**

- e-mail address
- behaviour in our facilities
- activities in our facilities
- attempts to misuse our services

For further information see the part on information obligations.

### **Data relating to health**

- the date and time when an accident happened
- the first name and surname of an injured person
- the resort where the accident happened

For further information see the part on information obligations.

### **Special categories of data**

Besides the above-mentioned data about health this category includes some specific data as of racial and ethnic origin, political opinions, the membership in a political party or in a movement, religious belief, world view, the membership in a trade union, the data relating to health, the data relating to sexual life, biometric data, the data about psychological identity, the data about psychological work capacity, the data about the breach of the regulations of penal law, offence law or civil law. But TMR does not process such data about you, for sure, except the data about your health in legitimate circumstances.

### **Marketing**

If the consent of the data subject (customer) for the processing of personal data on marketing purposes is necessary pursuant to legislation, the processing is under way only with those customers who have given their consent for this purpose.

If the customer does not want to obtain information about marketing activities, he/she can withdraw the consent anytime. Equally, the customer is entitled to object to the processing of personal data in an automated decision-making or to using profiling.

### **Newsletter**

Our latest news in Newsletter form are delivered to you if you have not objected to it. Newsletters are sent to customers who are members of the Gopass loyalty program, the Smart Season Pass program, or have used our services in, for instance, of accommodation.

If you are a member of our loyalty programme, we do not need your consent, because it is our legitimate interest. If you have not used our services and you are not our customer, we can only send you a Newsletter with your consent.

## **Part 2**

### **Legal basis for the processing of personal data**

TMR processes personal data of data subjects on some legal bases.

- a) the data subject has given the consent with the processing of his/her personal data at least for one particular purpose,
- b) the processing of personal data is necessary for the performance of the contract whose contractual party is the data subject, or, on the basis of the requirement of the data subject, for the performance of an action prior the conclusion of the contract,
- c) the processing of personal data is necessary in accordance with a special regulation or an international contract by which the Slovak Republic is bound,
- d) the processing of personal data is necessary for the purpose of legitimate interests of the data controller or a third party, except those cases in which interests or rights of the data subject requiring the personal data protection prevail the above-mentioned interests, in particular if the data subject is a child; this legal basis does not apply to the processing of personal data by public authorities when they are executing their tasks.

In case the processing of personal data is based on the consent of the data subject, the data subject is entitled to withdraw it anytime after an appropriate identification, for instance, via [privacy@tmr.sk](mailto:privacy@tmr.sk).

## **Part 3**

### **Principles of the personal data processing**

The principle of lawfulness

Personal data can be processed only in a legal way and the way so that the breach of the basic rights of the data subject does not come to pass.

The principle of the restriction of purpose

Personal data can be obtained only for a particularly determined, explicitly stated and legitimate purpose and they must not be further processed in a way which is not compatible with this purpose; further processing for the purpose of archiving, for a scientific purpose, for the purpose of a historical research or for a statistical purpose, if it is in accordance with special regulation 8), and if appropriate guarantees of the protection of data subject's rights according to law, is not considered to be incompatible with the original purpose.

The principle of the minimising of personal data

Data which are being processed must be appropriate, adequate and restricted to a necessary scope which is given by the purpose of the processing.

The principle of accuracy

Personal data which are being processed must be accurate and as necessary also updated. Appropriate and effective measures must be approved without delay for the ensuring of the condition of erasure and remedy of those data which are inaccurate with respect to the purposes of the processing.

The principle of the minimising of storage

Personal data must be stored in the form which enables an identification of the data subject not later than it is necessary for the purpose of the processing of personal data. Personal data can be stored for a longer time if they are supposed to be processed for the purpose of archiving, for a scientific purpose, for the purpose of a historical research or for a statistical purpose on the basis of a special regulation, and if appropriate guarantees of the protection of the data subject's rights are observed pursuant to law.

The principle of integrity and confidentiality

Personal data must be processed in the way which, by means of appropriate technical and organisational measures, ensures appropriate safety of personal data including the protection against unauthorised processing of personal data, the illegal processing of personal data, the accidental loss of personal data, the erasure of personal data and the damage of personal data.

The principle of responsibility

The data controller is responsible for the observance of the basic principles of the personal data processing, for the accordance of the personal data processing with the principles of the personal data processing and he/she is obliged to prove the accordance on inquiry of the authority.

## **Part 4**

### **Individual information obligations**

#### **A. PRIVACY STATEMENT – job applicants**

You are applying for a job in one of TMR Group companies and so this privacy statement relates to you and your personal data after submitting your application form. TMR is an international group of companies with various entities making business in various EU countries. For the purposes of this privacy statement, the entity of TMR Group in which you have submitted the application (data controller) is responsible for the protection of your personal data. This statement explains how we will use your personal data which we will obtain from you or third parties during the process of selecting an employee.

#### **1 Types of personal data**

If you apply for a job in TMR Group, we obtain the following information from you:

- Contact data. For instance, your first name, surname, address, e-mail address, telephone number.
- Information from your CV. For instance, your previous employment, education, skills, language knowledge, photography and any other further information which you decide to put in your CV
- Letter of motivation. Any information you have decided to put in your letter of motivation.
- Fitness for the job. You might have to prove that you are qualified, legally competent to be employed.

- Declaration of clear record. Depending on the nature of a work position and an individual country, we can ask you to submit the declaration from the government that you have not been convicted of any crime which would disqualify you for the given position.
- Test for the eligibility of your personality profile. Depending on the nature of a work position and an individual country we are allowed to ask you for the performance of the test.

Besides this, depending on the work position you are applying for, we can obtain information from third parties:

- In-house position application forms. If you are working for the company Tatry Mountain Resorts plc or for TMR Group and you are applying for an in-house work position, we can use the information from your personal file to complete the information which you provide us when applying for the job, or when applying for the change of your current work position.
- Assessment. We can ask you to undergo the assessment of your abilities, personality or your cognitive eligibility. Such assessments are usually performed by means of software or directly by a third party or through a company of the third party, which shares the results with us. We will provide you with further information relating to your individual situation before the performance of such assessment.
- References. We can decide to obtain the references from people who worked with you in the past. Generally speaking, we will contact those people only if you provide us with their names and contact data. If you are already an employee in one of TMR Group companies, we can ask your manager and/or your colleagues for the references, even without your knowledge.

## **2 Purposes for the processing of personal data**

The data controller will process your personal data for the following purposes:

- Recruitment of new employees. We process your personal data to find out if you are a qualified candidate for the position you are applying for. A pre-contractual relation whose contractual party you can be or a legitimate interest of the data controller or your consent can all be the legal basis in that case.
- Settlement of disputes. We can process personal data for the purpose of settlement of disputes, complaints or legal cases. The legitimate interest of the data controller is the legal basis in that case.
- Observance of the law. We might have to process your personal data to observe the law or to comply with a court order. The performance of the legal obligation of the data controller is the legal basis in that case.

## **3 Parties which can access your data**

The data controller can share your personal data with third parties under the following circumstances:

- If we obtain the information from third parties (as mentioned above), we will provide the parties with your name and any further data which are needed for them to provide us with relevant information about you.
- We can share your personal data with other third parties which act on our behalf, for instance, with providers of services. In such cases the third parties can use your personal data only for the above-described purposes and in accordance with our instructions.
- Your personal data will be accessible by our employees. In that case, the access will be given only if it is necessary for the above-mentioned purposes, and only if the employee is bound by confidentiality obligation.
- If it is required by law or a court order, we can share your personal data, for instance, with law enforcement authorities or other governmental bodies.

## **4 Location of your personal data**

Your personal data will be located exclusively within EU and EEA countries.

## **5 Storage of personal data**

We store your personal data for a limited time period and when they are not needed for the above-mentioned purposes of the processing any more, the data will be erased. It means that we store your personal data for the time of the open competition and we will erase them after we select the suitable candidate. Some of the data about your presence in the open competition will be stored on the basis of our legitimate interest until the end of the year following that one in which we obtained your personal data for disposal. If we select you for the position, we will store your personal data in a personal file in accordance with our HR regulations about the protection of personal data.

We can process your personal data for a longer time period after the completion of the open competition, that is in case a legal dispute will come to pass or if you provide us with the consent to store your personal data in our records for a longer time.

## 6 Legal bases for the processing of your personal data

We process your personal data because it is necessary for the purpose of a legitimate interest which we pursue on the basis of your consent. In this case our legitimate interest is to select qualified candidates. In some other cases, we will process your personal data to meet our legal obligations.

### B. PRIVACY STATEMENT – TMR Group employees (including temporary employees, part-timers, employees who work under the contract for work, and employees who work within labour-law relations, leasing employees or persons working on a similar basis)

This statement applies to you and to your personal data because you are an employee in an entity within TMR Group. Our company acts as the data controller at the processing of your personal data. For the purposes of this privacy statement, the entity of TMR Group (the data controller) with which you have concluded your contract is responsible for the protection of your personal data. This statement explains how we will use your personal data, which we will obtain from you or from a third party during your contractual relation with the company within TMR Group. We point out that since this statement applies to all TMR Group, some minor local differences in the way of processing for individual purposes can occur. If you want to obtain detailed information, please contact our local person responsible for the protection of personal data (see below).

## 1 Types of personal data

We process the following data:

- **Personal contact data.** For instance, your name, address, e-mail address, telephone number.
- **Work contact data.** For instance, company address, work e-mail address, telephone number.
- **Personal data.** For instance, gender, marital status, the date of birth, nationality, birth certificate number (national identification number), photography.
- **Contract data.** For instance, the content of your work contract.
- **Information on your family members.** For instance, emergency contact, contact in case of tax payment and the exercise of tax concessions.
- **Payment information.** For instance, bank account number, applications for refunding of expenses and payments.
- **Details about your work position.** For instance, title of your work position, department, position in the job classification system, responsibilities.
- **Information relating to remuneration, pension security and other benefits.** For instance, your wages, arranged bonuses, company car, pension security scheme, attendance at work.
- **Details about your hours worked, holiday and medical leave.** For instance, your work schedule, holiday entitlement, absence due to your medical leave.
- **Information relating to your education, professional training and career advancement.** They include your highest level of education and professional background, any courses or trainings which you have undergone, more precisely issued certificates.
- **Performance and assessments.** For instance, the content of your assessments and numbers relating to your work performance.
- **Entrusted property.** Information on the company property which was provided to you for using, for instance, company mobile phone or laptop.
- **Data about correspondence and communication.** For instance, e-mail correspondence, internet data transfer, IP address.

- **Digital access rights.** Your access rights to various applications within IT infrastructure of TMR Group company.
- **Information relating to safety.** For instance, the number of your access card, information relating to whether or not you are present in the building, and CCTV recordings.
- **Monitoring of the camera system in our operations.** Your likeness and behavior or performance in our facilities. As part of the recording of a Mystery shopping activity, sound may also be recorded for this purpose. We will make an active approach to the record only after a security incident or in the case of Mystery Shopping for quality control has been recorded.

We will process your information relating to sensitive issues only for purposes strictly connected with proper performance of our obligations as your employer and within the scope enabled or required by applicable legal regulations. We will process the following types of sensitive information:

- Data about your state of health – the performance of our obligation following from the special regulation will be the purpose and the performance of our legal obligation will be the legal basis.
- Convictions or criminal acts. In this case it is one-time processing in the form of inspection in cases of those data subjects who enter into a contractual relation for selected work positions.
- Personality tests. In case of taking up selected work positions, on the basis of your consent we can put you to the personality test (managing positions in which we must consider personality traits or character of an individual at coping with stress or workload at demands relating to the selected work position).

## 2 Purposes of the processing of personal data

The data controller will process your personal data for the following purposes:

- **HR administration.** We perform personal records about all our employees. On the basis of analyses of our HR records we also make strategic decisions about our HR regulations. The contractual relation in which you are one of the parties is the legal basis.
- **HR management.** We occupy ourselves with everyday management of HR questions, for instance, ensuring of proper staffing. The contractual relation in which you are a contracting party is the legal basis.
- **Adaptation.** We process your personal data at your start in our company to find out if you are properly trained and equipped. The contractual relation in which you are a contracting party is the legal basis.
- **Payment of wages and pension and provision of other benefits.** We process your data to be able to pay out your wages, contribute to your pension and provide with other benefits (it depends on performance). The contractual relation in which you are a party is the legal basis.
- **Taxes and social insurance.** We are obliged to process certain personal data for the purpose of the performance of our obligations relating to the tax law and other regulations connected with social security and insurance. The legal obligation of your contracting party is the legal basis.
- **Insurance to cover the risks and responsibility.** We insure a lot of risks which can occur in our business, for instance, against any damage relating to injuries during work performance or travel insurance for our employees who travel on behalf of the employer. We can also provide a collective programme of health insurance. Depending on the type of insurance, we might have to process your personal data, for instance, at processing of your financial claim. The legal obligation of your contracting party and alternatively the legitimate interest of the data controller are the legal bases,
- **Ensuring of communication and information technologies.** We provide you with IT equipment and services which you need when performing your duties, for instance, a company mobile phone or an e-mail address account. We have to process your personal data to carry it out. The contractual relation in which you are a contracting party is the legal basis.
- **Communication/IT monitoring.** We will monitor communication and the use of network to ensure our IT environment and the network infrastructure and also to ensure that our employees use the devices in accordance with applicable law and the internet regulations. The contractual relation in which you are one of the contracting parties and the legitimate interest of the data controller are the legal bases.
- **Management of performance and trainings.** We perform the assessment of work performance to ensure your adequate performance. If you do not have an e-mail address for the employer, we will contact you when you first contact us with a call to attend the training provided by the e-mail address you provided us. Besides we try to support the development of our employees and so we provide or propose courses or trainings. The contractual relation in which you are one of the contracting parties and the legitimate interest of the data controller are the legal bases.
- **Building of healthy and safe workplace.** We want our employees to be healthy and feel safe. That is why we process personal data of our employees to be able to analyse how to improve the quality of their work and decrease any potentially unhealthy influences. We also apply safety measures, for instance CCTV cameras, to ensure safety of our

employees, visitors and property. The contractual relation in which you are one of the contracting parties and the legitimate interest of the data controller are the legal bases.

- **Recruitment of employees.** We already process your information when you apply for a position in our company. We can also go through records of our employees to find out if we have suitable candidates for the staffing. For further information see our Privacy statement – onboarding of new employees. The contractual relation in which you are one of the contracting parties and the legitimate interest of the data controller are the legal bases.
- **Settlement of disputes and investigation of offences.** We can process personal data for the purposes of settlement of disputes, complaints or legal procedures or if we have a suspicion of an offence which we would like to investigate further. The legitimate interest of the data controller is the legal basis.
- **Observance of the law.** We might have to process your personal data to observe the law (for instance, in case your name is identical with a name found in so called lists of designated parties and in case of observance of the act on money laundering) or to comply with the court order. The performance of the legal obligation is the legal basis.
- **Presenting our company to our customers.** We want to communicate transparently and access our customers in the most accessible way possible so that they know who cares about them, that they can rely on us and trust us. For example, by accessing your portrait with the name and surname of an employee who works for customers. The legal basis is our legitimate interest.
- **Mystery shopping.** It depends on the quality of our services and therefore we want to verify it. We will give feedback to you, so I want to achieve the prevention, quality and efficiency of your activities, or a warning of risks. The legal basis is our legitimate interest.
- **Monitoring of the camera system in our operations.** Control of compliance with security and protection of the rights and rights of the protected interests of the operator. All camera monitoring rooms are properly labeled with a pictogram, operator log, and address with all information about processing personal data. Unless we have a legal obligation to retain such data, we will delete it after 15 days.
- **Training and informing about news through the company magazine:** The development of knowledge in the area of information security will be carried out online, as well as informing about company news and sharing the corporate culture. Colleagues who have not created a domain email address will be contacted via the email address they provided us when concluding the contractual relationship. The legal basis is our legitimate interest.

### 3 Parties which might have access to your personal data

The data controller can share your personal data with third parties under the following circumstances:

- We can share your personal data with other third parties which act on our behalf, for instance, with a provider of services. In such cases the third parties can use your personal data only for above-mentioned purposes and only in accordance with our instructions.
- Your personal data will be accessible for our employees. In such case the access will be approved only if it is necessary for above-mentioned purposes, and only if the employee is bound by confidentiality obligation.
- If the law or a court order require it, we can share your personal data, for instance, with our suppliers or with clients, tax authorities, social welfare authorities, law enforcement authorities, or with other governmental bodies.

### 4 Location of your personal data

Your personal data will be stored exclusively within EU and EEA countries.

### 5 Storage of personal data

We store your personal data for a limited time period and they will be erased after the termination of the purposes for their processing. In most cases it means that we store your data during your employment. If it is possible, we erase the data even during your employment as soon as they are not necessary any more. In any case, we erase your personal records in accordance with the special legal regulations (for instance, act on archiving, act on registry offices), and those records which are not mentioned in the regulation we erase not later than two years after the termination of employment if another local legislative does not require their storage for a longer time period.

We can process your personal data for a longer time period after the termination of employment in case of an ongoing legal dispute or if you have given consent for the long-term storage of your personal data.



## 6 Legal bases for the processing of your personal data

In most cases we process your personal data on the basis of the fact that the processing is necessary for the purposes of a legitimate interest which we pursue. Our legitimate interest is, in this case, to engage in the HR processing for above-mentioned purposes. In many cases, we will also have to process your personal data on the basis of a legal obligation. We will have to process your data to meet contractual commitments in relation to you as well, for instance, in the case of payment of wages. The last but not least, in some cases, we can ask for your consent. In that case you still have the possibility to withdraw it.

### C. PRIVACY STATEMENT OF TMR Group – customers

This statement applies to you and to your personal data because you are a customer of an entity within TMR Group. Our company acts as the data controller at the processing of your personal data. For the purposes of this privacy statement, the entity of TMR Group (the data controller) with which you have concluded your contract or a membership in a loyalty programme is responsible for the protection of your personal data. This statement explains how we will use your personal data, which we will obtain from you or from a third party during your contractual relation with the company within TMR Group. We point out that since this statement applies to all TMR Group, some minor local differences in the way of processing for individual purposes can occur. If you want to obtain detailed information, please contact our local person responsible for the protection of personal data (see below).

#### 1 Types of personal data

We process the following data:

- **Contact personal data.** For instance, your first name and surname, permanent address, address for sending writings, e-mail address, contact telephone number, identity card number, birth certificate number, university degree, the date of birth, forgotten values (such as wallets, clothing, bags, or electronics in our facilities, especially hotels or cableways, etc.).
- **Work contact data.** For instance, the address of the company you represent, work e-mail address, telephone number.
- **Contract data.** For instance, identification data and data from identification documents, the content of the contract which has been concluded with our company including all its addenda, the scope of services which are being provided, the type of terminal equipment and its marking, registration number of the motor vehicle, the date and grade of the course or performance, the type and size of the equipment borrowed, the used sports equipment and the equipment..
- **Information about family members.** For the purposes of placement in favoured groups of customers, the date and grade of the course or performance, the type and size of the equipment borrowed, the used sports equipment and the equipment..
- **Payment information.** For instance, bank account number and the amount of fee-based services.
- **Data about correspondence and communication.** For instance, e-mail correspondence, Internet data transfers and IP address.
- **Specific personal information.** Height and weight for safety settings.
- **Access rights.** Your access rights to various applications within IT infrastructure of the company, numbers of chips.
- **Fiscal bill.** In order to check your person for prize and draw points, we give you your name and surname, the possible room number or room number.
- **Information relating to safety.** For instance, the number of your access card, information relating to whether you are present in the building, and CCTV recordings for example in water parks, amusement parks and ski resorts.
- **Data from the identification document.** ID, passport.
- **Photos from the LEGENDIA amusement park.** In the case of amusement parks, we take pictures of you as a participant in the event:
  - **Souvenir photography.** If you are interested, you can buy a photo of your person made using attractions. If you do not use the option to purchase a photo, it will be deleted until 23:59:59 on the day the photo is taken.
  - **Photographs of a Hall of Fame member.** If you use the "Interactive Dark Ride" (Lech Coaster, Bazyliiszek, Dimond River, Rapid River, Dolina Jagi), your photo will be included in the Hall of Fame of the most successful participants for the purpose of handover the prize. Preserving the Hall of Fame photo is the end of the season in LEGENDIA.

- **Taking pictures in Aquapark Tatralandia.** If you're interested, you can buy a person's photo taken from the attractions of the water slide. If you do not use the option to purchase a photo, it will be deleted within 72 hours from the day the photo is taken, so that it can be sent to the customer again based on his requests.
- **Photos of your portrait when checking the entry.** We verify your portraits during turnstiles in our operations, especially in the ski resorts. This is the only way we can verify the non-use of our products, as we also have such customers. Tickets are sold as non-transferable, so I check their impenetrability.
- **Monitoring of the camera system in our operations.** Your likeness and behavior or performance in our facilities. I will make an active approach to the record only after a security incident has been recorded.
- **Photography in ski schools.** Your portrait during a ski or snowboard school.
- **Gift vouchers.** Identification of the donor and the donor together with the subject of the donation and donation of donated gift, to the extent necessary to fulfill the purpose of processing.
- **Identifying information and data on your hiking trips and timing.** In this case, you are registering and registering your name, surname, telephone contact, the date and time of your trip, for example, into the alpine environment and the date and time of your expected return from the trip.
- **Using our resorts and chairlifts:** The approximate distance you travelled, how many altitudes you overcame and how you used our resort. The data in question is processed and evaluated based on your consent as stated in our application.
- **Receiving a feedback:** As part of the data collection for this purpose, it may be necessary to determine your sex/gender, age, profession, education, device used, status, children, residence, interests. Data collection to the extent of: voice recording, hand movement recording, screen recording, collecting general data on the service satisfaction TMR + QUESTIONNAIRE.

## 2 Purposes and aims of the data processing

The data controller will process your personal data for the following purposes:

- **Customer administration.** We keep personal records on all our customers and their services. On the basis of our records analysis we also make strategic decisions about offers for our customers. The contract concluded between us and the legitimate interest of our data controller are legal bases.
- **Provision of accommodation services.** We have to ensure the record keeping of accommodated guests in accordance with special regulations. The performance of the legal obligation of the data controller is the legal basis and performance of the contract in which you act as a contractual party.
- **Verification of performance.** Through documents such as a fiscal receipt, the GOPASS Personal Zone. You can check the score draw. The legal basis is a legitimate interest, in combination with the performance of a contract concluded between us and a legitimate interest of the controller.
- **Loyalty programme GOPASS.** Record-keeping of customers and sending Newsletters about the latest offers and services connected with the membership in the loyalty programme. Participants and founders of the loyalty programme are stated in the trading conditions. The contract concluded between us and the legitimate interest of our data controller are legal bases.
- **Ski challenge.** Skiing statistics in our resorts Jasná, Štrbské Pleso, Starý Smokovec, Tatranská Lomnica, Špindlerův Mlýn a Szczyrk, reached levels, friends who accepted sharing of statistics. When searching for a new friend, all users will be able to see your selected data including name, surname, city and picture (in case you have your picture stored within your profile) using your full name and surname or your email address under which your account is registered as inputs for searching. In order to share detailed statistics covering name, surname, city, picture, slope kilometers, altitude difference, completed skiing days, chosen level (target you set to reach during the season) and chart of your actual turnstiles' crossings for ongoing season with a friend, you have to accept an invitation via email communication. The legal basis for processing of your data is your consent. Withdrawal of your consent is possible at any time by sending a withdrawal request to [info@gopass.sk](mailto:info@gopass.sk). Your statistics will be available only to you and friends accepted from your side. All concerned data will be processed within TMR Group during duration of your membership in Gopass programme.
- **Administration of the Smart Season Pass program:** Customer registration and sending of Newsletters about the latest offers and services associated with the Smart Season Pass membership program. Records of discounts and recommendations for their use. Program participants and founders are listed in the Business Terms and Conditions. The legal basis is the contract concluded between us and a legitimate interest of the operator.
- **Rental shop of sports equipment.** Goods which you rent have their value and price and so we have to keep recordings who has rented them. In the case of special services and goods we have to ensure their functions considering the setting of the rented goods and so we have to obtain the information about your weight or height (for instance, ski equipment or snowboards etc.). To protect our rights, we also record photocopies of documents, taking into account

and processing only the data necessary to fulfill the purpose of the processing. The contract concluded between us and the legitimate interest of our data controller are legal bases.

- **Ski school.** We have to register the information which our colleague instructor attended to you and also the fact whether he/she met your expectations. It is also in your interest. The contract concluded between us and the legitimate interest of our data controller are legal bases.
- **Popularization of our company and its services.** In case you will not object, we may disclose to our communication channels as part of the promotion of our company your likeness when using our services, for example, in ski or snowboard schools. In the case of children, parents will also be informed about this activity. We carefully select all shots so that they do not have a monster or mischievous character. The realization of these activities is based on the legitimate interest of our company as an operator.
- **Teaching at a ski or snowboard school.** For the purpose of teaching, we need to process your data so that we know how you have progressed, how best you taught it, where you were taught, and so on. Everything for your comfort and enjoyment of used services. The subject of processing is on the legal basis of the operator's legitimate interest.
- **Instructor courses.** For purposes of teaching, we need to process your data so that we can provide a certificate of your ability to teach our customers. The legal basis is the performance of the contract concluded between you and our company.
- **Entrance to aquaparks, amusement parks and cableways.** The ensuring of safety is first and foremost in our company. Prevention from misusing of our loyalty programme is equally in our great interest. These are the reasons why we keep recording of entries and movement and activities in our places and verify our customers even through their portraits to adhere to the terms and conditions.
- **Purchase of tickets for events (for instance, Tatras dinner, snowcat...).** The contract concluded between us, the performance of the legal obligation and the legitimate interest of our data controller are legal bases.
- **Direct marketing.** We pursue the development of our customers and tailored offers to them. The legitimate interest in the case of Newsletter communication and the consent we have obtained are legal bases.
- **Taxes and accounting.** We are obliged to process specific personal data for the purpose of performing the obligations following the tax law and other regulations connected with financial execution. The performance of legal obligations is the legal basis.
- **Security and threats to the operation and network.** We check functionality, safety and stability of our network operation in which you are a participant, sale, registration and control of the use of entrance tickets to the premises. The performance of legal obligations and the legitimate interest of the data controller are legal bases. On the legal basis of the contract concluded between the processor and the data subject and the legitimate interest of the processor.
- **Settlement of disputes and investigation of offences.** We can process personal data for the purposes of settling disputes, complaints or legal procedures or if we have a suspicion of an offence which we would like to investigate further. The performance of legal obligations and the legitimate interest of the data controller are legal bases.
- **Observance of the law.** We might have to process your personal data to observe the law (for instance, in case your name is identical with a name found in so called lists of designated parties and in case of observance of the act on money laundering) or to comply with the court order.
- **Share of data within TMR Group.** Your data in necessary scope of the provided services will be provided to TMR Group companies so that you are not repeatedly contacted with the offer of the services which you have bought and so that you could use benefits of the whole TMR Group as collective controllers. The performance of legal obligations and the legitimate interest of the data controller are legal bases.
- **Marketing consents.** Equally, the use of some other data can occur but only on the basis of special consents which we ask you for in advance. Your consent which we have obtained is the legal basis.
- **Records of acting of a personal nature.** On the legal basis of legitimate interest (prevention of abuse of service and protection of property) and the provisions of § 12, paragraph 2 and 3 of Act no. 40/1964 Coll. The Civil Code, as amended, and Section 10 (3) (a) of the Act, the operator may make pictorial images or audiovisual recordings for official purposes on the basis of the Act, for artistic purposes or for purposes of film, radio, print or television news. When performing such a recording, the processor shall take into account the legitimate interests of the individuals concerned and shall make as little harm as possible to their privacy.
- **Customers under 16 years.** In case you are under 16 on the date when signing contractual documentation with our company and you want to provide our company with your consent, the consent must be executed by your legal representative.
- **Monitoring of the camera system in our operations.** Control of compliance with security and protection of the rights and rights of the protected interests of the operator. All camera monitoring rooms are properly labeled with a pictogram, operator log, and address with all information about processing personal data. The legal basis is the legitimate interest of our company. Unless we have a legal obligation to retain such data, we will delete it after 15 days.

- **Losses and Findings.** If you forget about our devices, we will be glad to share your stuff with you if you require a refund. However, for this purpose, we need to verify your identity and record to whom we have surrendered these forgotten things. The legal basis is the legitimate interest of our society.
- **Gift vouchers.** If you decide to grant someone with one of our products or one of our services, we will need to process donor and donor identification data to the extent necessary. Our company processes the personal data of the holder of the gift voucher in order to check the eligibility of the services provided by the operators in the individual centers of the operator and / or in the Štrbské Pleso resort, for which the gift voucher is issued. Personal data are processed for the time necessary to fulfill the purpose of the processing - checking the eligibility of the services provided by the operators in the individual resorts of the operator and / or in the resort of Štrbské Pleso, for which the gift voucher is issued. Legal basis is the contract concluded between us and the donor and legitimate interest of our company along with the expectation of the gifted.
- **Book of trips.** If you make a trip especially to a mountain or alpine environment, it is our legitimate interest to know when you plan to come back from it, even in the case of declaring a search for action through mountain service, which is certainly your expectation. The legal basis for processing is an legitimate Interest of data controller.
- **Consumer competitions.** We will process your personal data for this purpose to the extent necessary for the performance and registration of the contest. The legal basis for processing is a contract between us and you on the basis of which you accept the terms of the competition and from which we both have rights and obligations.
- **Sports events and competitions.** We will process your personal data for this purpose to the extent necessary for the performance and registration of the event or competition. It is possible that in addition to this information, we will promote this event or contest, and will make it a picture or film report that we will publish through our communication channels to popularize sports, nature, landscapes, events, and the resort in which they have been made. The legal basis for processing is a contract between us and you on the basis of which you accept the terms of the competition and from which we both have rights and obligations.
- **Weather and facilities operation information:** In case of your interest, we send you information about the operation and weather in our resorts in our morning Newsletter. The legal basis is the consent you have given us and a legitimate interest associated with your expectations.
- **Testing for the Customer Experience:** In the event of accepting the testing terms and conditions and your personal interest, we will use your data and comments regarding the company development. The legal basis for such processing is the Data Subject Consent.
- **COVID 19:** In the territory of the Slovak Republic, according to Decree 34/2020, DECREE of the Public Health Office of the Slovak Republic, which orders the control of the certificate on the negative result of testing on Covid 19.

### 3 Parties which can have access to your data

The data controller can share your personal data with third parties under the following circumstances:

We can share your personal data with other third parties which act on our behalf, for instance, with the provider of services. In such cases the third parties can use your personal data only for above-mentioned purposes and only in accordance with our instructions.

Our employees will have access to the personal data. In such cases the access will be given only if it is necessary for above-mentioned purposes and only if the employee is bound by confidentiality obligation.

If it is required by the law or a court order, we can share your personal data, for instance, with our suppliers or clients, with tax authorities, social welfare authorities, law enforcement authorities or with other governmental bodies.

We protect the personal data provided by the operator from unauthorized use and do not perform any operations that would disclose the provided personal information or otherwise make it available to unauthorized persons. We undertake not to provide the collected personal data to any third party or any other recipient, except for reasoned case law or under conditional case law.

### 4 Location of your personal data

Your personal data will be stored exclusively within EU and EEA countries. Our company may, while processing personal data, perform processing operations that involve the cross-border transfer of personal data provided abroad within the EU Member States, access to these data from abroad through remote access due to the administration of the information system by an intermediary based in that country. During the transfer, we take care to maximize privacy protection by encrypting and using both software and hardware tools to secure the data being transferred. Your data can also be published through our

communication channels and social media, but we will always give you this fact in advance and you have the opportunity to object to such processing.

## **5 Storage of personal data**

We store your personal data for a limited time period and when they are not needed any more for the purposes of processing, the data will be erased. In the case of pre-registration through B2B partners as our brokers, it will be within 30 days; in the case of offline orders, your data will be processed for the duration of the order, which in most cases it means that we store your personal data for the time of your relation with us.

Transitions through turnstiles. Your photos will be kept as follows: seasonal tickets for the whole season, as well as the GOPASS card, and short-term tickets for their validity and the next 30 days after the expiration date to provide information for resolving the complaint. When crossing the turnstiles, all photos are kept during the day and after 23:59:59 only the first and last photo from the passage through the turnstile of the previous day will be kept.

If it is possible, we will erase your data even during your relation with us as soon as they are not needed any more. The standard retention period of your personal data after providing the service is 5 years, in the fulfillment of legal obligations under the Act on Accounting and the Value Added Tax Act 10 years. In any case, we will erase your personal records not later than the expiration of legal time periods after the termination of the contractual relation, unless the legislation demands their storage. In the case of other deadlines, you will be notified of them directly in the processing conditions (for example, in relation to the processing of personal data in competitions and events).

We may process your personal information for a longer period of time after termination of the relationship in the event of a continuing legal dispute or if you have granted us permission to store your personal data for a long time.

## **6 Legal bases for the processing of your personal data**

The legal bases are stated separately for each purpose of the processing. In most cases, we process your personal data on the basis of the fact that the processing is necessary for purposes of the legitimate interest which we pursue or on the contractual basis or on the basis of your consent as the data subject. You can withdraw the consent anytime by verifiable announcement to the company. In many cases, we will also have to process your personal data on the basis of the legal obligation in accordance with a special regulation. In case of the processing on the basis of your consent you still have the possibility to withdraw it.

### **D. PRINCIPLES OF THE PERSONAL DATA PROTECTION (SUPPLIER AND OTHERS)**

These principles apply to the processing of your personal data as you are a representative of our present or future client, supplier or a business partner. You can find here the information about the processing of personal data which you have provided with us to perform provided services.

#### **Why do we have access to your data? Why do we process them?**

It is necessary to process your personal data so that it would be able to conclude and perform the contract with you or with the company you represent. We can also process personal data about visitors of our websites and real offices, depending on how you have decided to communicate with us.

We process your personal data only if we have the legal basis to do it. It means that the processing has to be necessary for the performance of the contract in which either you or the company you represent is a party. Or it has to be necessary to enable, on request, the performance of some steps even before the contract is concluded. In accordance with our legitimate interest we can also use your data to provide you with information about our services, prospects, analyses, events and trainings which could be in your best interest. We can also do it to enable the performance of some needed or required tasks following the business relation you represent.

We have the legal obligation to provide your personal data for an inspection by legitimate institutions and for prevention, monitoring and giving evidence of any fraud as well as in the struggle against money laundering and any other criminal act.

Your personal data will be safely stored in accordance with legal regulations on data protection.

#### **What kind of personal data about me do you process and why?**

We store information required for managing a contractual or business relation. We need your name, the title of your position and some contact data like your address, telephone number and e-mail address to be able to communicate with you and ensure your safe and true identification.

We need to verify some other personal data such as your birth certificate number or the date of birth, identity card number or passport number or some similar identification data as well as some related information required by specific regulations. We have to do it to be able to perform our legal obligations relating to, for instance, the fight against money laundering.

We also use CCTV cameras in various places to ensure the safety of our employees and the protection of your personal data. And so, we ask you to provide us with, for instance, your name and telephone number in order to ensure your access to our places where some information characterised as also personal data are processed. Unless we have the legal obligation to store the data, we will erase them after 15 days.

Unless we arrange with you otherwise or unless it is necessary to establish, apply or defend legal claims, we will not include special categories of personal data (often called as "sensitive personal data" such as data detecting racial or ethnic origin, political opinions, religious or philosophical beliefs, membership in trade unions as well as data relating to health or sexual life).

Monitoring of the camera system in our operations. Control of compliance with security and protection of the rights and rights of the protected interests of the operator. All camera monitoring rooms are properly labeled with a pictogram, operator log, and address with all information about processing personal data. The legal basis is the legitimate interest of our company. Unless we have a legal obligation to retain such data, we will delete it after 15 days.

#### **Will you share my personal data with other parties?**

We can share your personal data with our suppliers who arrange and/or ensure a part of our services, for instance, copy and post services (for the possible sending of our offers) or with lawyers. We can also share your personal data with our clients if you represent a supplier who is included in services which we provide them and also legitimate institutions. The list of data processors is in our websites.

Our employees will also have access to your personal data. In that case the access will be enabled only if it is necessary for described purposes and only if the employee is bound by confidentiality obligation.

#### **Will my personal data be a subject of cross-border flow?**

It is possible that your personal data will not be transferred also to a country outside EU or EEA.

#### **How long will you store my personal data?**

We will store your personal data for as long as it is necessary for the purpose of the processing depending on specific regulations and the purpose for which they were obtained; if we have legitimate interest to store them, for instance, until the termination of the contractual relation and/or until the expiration of period of limitation within which you should be able to defend yourselves against legal claims. We are also legally obliged to store your personal data for a fixed period to prevent and uncover deceptions and to uncover and prove the fight against money laundering as well as for financial audits.

Regarding our data backup, your data will be deleted also from our storage sites, but only if and when the backup is obtained to data recovery by our rules of retention, BTM and DRP. If the backup is obtained to erasure according to our backup rules, your data will be completely deleted.

#### **Will I be the subject of an automated decision-making?**

Your personal data will not be used in automated decision-making.

### **E. STATEMENT OF THE PROCESSING OF DATA FROM THE WEB ENVIRONMENT AND COOKIES OF TMR Group**

#### **Cookies**

If you visit a webpage which writes cookies, a small text cookie file is made in your computer. Cookie file is a short text file which a website saves in your computer or a mobile device (including a tablet) when browsing the webpage. When you visit the webpage next time, you connect to it faster due to cookies. Besides the webpage recognises you and offers you such

information you prefer, it ensures that an advert which has been displayed will not display again, or it enables you to enter it without repeated inserting your password. In case of filling in your identification data, the webpage offers you to add the information you filled in when visiting the webpage before and as a follow-up to the information, it displays relevant content and offers estimated activities and services which, we assume, you could use.

We use cookie files to analyse the attendance of websites through Google Analytics, Google AdSense, Facebook, Strossle and Gemius SA, Exponea, HotJar, SaS, Adform – Audience network Ecommerce. It is a tool for analysing, which helps the owners of websites and applications understand how these facilities are used by visitors. Cookie files are possible to be used for statistical data about the use of websites without a personal identification of individual visitors.

### **Legal basis for the processing**

If we are able to identify a visitor of a webpage when recording, it is the case of the processing of personal data. We must have a legal basis for such processing. Your consent as the data subject can be one legal basis. The legitimate interest of the data controller, that is us, to offer you the best setting of services or support at your activities in the contractual relation with our company, including direct marketing, is another legal basis. The latter option comes up in particular at monitoring of your activities and their assessment.

### **What kinds of cookies do we assess?**

Session cookies are temporary cookies which are saved in your computer or laptop or a mobile device until you leave a webpage (website); in that moment they are erased. Such cookies help e webpage (website) to remember the information when you go from one webpage to the other one and it means that you do not have to enter the information again or repeatedly fill them in.

Persistent cookies stay saved in your computer or laptop or a mobile device after you leave a webpage (website); such cookies help a webpage (website) to remember you when you come back as a visitor yet they do not identify you as a person.

### **For what purpose do we use cookies?**

In general, we can divide cookies into 4 categories depending on their function:

- Necessary
- Operational
- Functional
- Promotional

Necessary cookies enable you to browse websites and use basic functions such as secure spaces, shopping baskets and online payments. Such cookies do not collect any information about you which can be possibly used in marketing nor they remember where you moved on the Internet.

With their help

- we, for instance, remember the data which you put in your order when you go from one screen to another during your visit;
- we remember goods and services which you have ordered when you come to the webpage for payment;
- we detect your identity when you log on;
- we ensure for you that you can find a needed service in our website even in the case we have reorganized our website in a way;
- When they are banned, we cannot guarantee the complete functionality of our website.

Operational cookies collect information on how you use our website, for instance, which webpages you visit, whether you encounter any errors, for instance, in forms. Such cookies do not collect any information which could help reveal your identity. All the collected data are anonymous and serve only to enable us to optimize the functioning of our website. It also enables us to find out what interests our customers and gives us the information how effective our advert was.

With their help

- we obtain statistical data how our website is used;
- we find out the effectiveness of our advertising (Notice! WE DO NOT USE these data to send you our adverts in case you visit another website.);
- we provide our partners with information that one of our visitors also visited their webpages. Such information includes, for instance, the data about a purchased product. Our partners can thus improve their webpages but they are strictly not allowed to use the information in a subsequent advertisement;

- we can discover potential errors and improve website by their removal;
- we test various conceptions of our website;
- we cannot guarantee the complete functionality of our website when you ban the cookies.

**Functional cookies** serve the provision of services or remembering settings to ensure maximal comfort when you visit us.

With their help

- we remember what setting you have chosen, for instance, graphic design, font, pre-sets and colours;
- we remember if we have already asked you if you want to fill in a questionnaire (and we do not have to bother you with that again);
- we can offer you a support in the form of proactive chatting programmes;
- you find out if you are logged on our website;
- we can provide your data to our partners who can subsequently offer you their services on our website. The data will serve exclusively for the provision of services, products or functions but for nothing else.

**Promotional cookies** are connected to services provided by other companies, for instance, icons like “I like it” and “Share”. These services are provided by another company as a follow-up to the fact that you have visited our webpages.

With their help

- we can connect you to social networks, such as Facebook, and on the basis of your visit you will then get advertisements from another website;
- we can provide the data about your visit to advertising agencies which will subsequently send you adverts which you could possibly be interested in;

#### **What data about you can we assess?**

The information about your visit on our website (www);

The information about the Mac address of the device from which you are connecting to us;

The information about the IP address of the connection;

The information from Google analytics which collects the data about the platform, browser, geolocation, language location etc.

The information about the time period spent in a certain part of the web, heat maps – how the user works with the web etc.

#### **Automated decision-making and profiling**

In case we have your consent from some other of your activities, we connect the above-mentioned information with the information about your activities for which you have given us your consent (for instance, by stating your telephone number, e-mail address, the number of your discount voucher, registration number, the number of your loyalty club card etc.). The aim of the connection is better understanding of your preferences and interests and subsequent better setting of the offer directly for you.

You are allowed to object to such processing anytime or in case the automated decision-making should impact on your rights and freedoms, you can require an individual decision-making from our party (for instance, in the form of our better offer).

#### **How to check the setting of cookies**

You can either check or erase cookie files by your own consideration. For further information see webpage [aboutcookies.org](http://aboutcookies.org).

You can erase all cookie files from your computer and you can set majority of browsers in the way to disable them to save cookies.

Cookies are useful unless a website owner misuses them for an unauthorised collection of data. If you do not trust cookies, you can erase them from your disc regularly. In some cases, there can come to an incorrect write of information cookies and so a problem can occur to log on our Internet applications (webmail.telekom.sk). You can find instructions for the erasure of all cookies, including the incorrectly written ones, on websites mentioned below.

#### **Instructions how to erase cookies in individual Internet browsers**



- Internet Explorer™ <http://windows.microsoft.com/sk-SK/windows-vista/Block-or-allow-cookies>
- Safari™ <http://www.apple.com/>
- Opera™ <http://help.opera.com/Windows/10.20/sk/cookies.html>
- Mozilla Firefox™ <http://support.mozilla.org/sk/kb/povolenie-zakazanie-cookies>
- Google Chrome™ <https://support.google.com/chrome/answer/95647?hl=sk&hlrm=en>

We do not transfer your information to third countries outside EU and EEA.

#### How long will we store the data from browsing?

The data that are stored according to the setting of the cookies are not stored in our systems. We store the information which we combine with the data from cookies according to your provided consent or according to the duration of the contractual relation between you and our company. We will store the combined data from cookies and our systems during your membership in our loyalty club and also during the time period for which we will have your consent. In the opposite case the data will be anonymized.

Data in CRM system are valid during your membership in our loyalty programme. After the termination of your membership, we will anonymize them.

Anytime, you can initiate the supervisory body of the Slovak Republic, that is the Office for Personal Data Protection of the Slovak Republic for the purpose of your protection.

#### Withdrawal of the consent

In the case we process your personal data on the basis of your consent, it is possible to withdraw the consent anytime or you can object to and initiate our places of the first contact or you can send your initiation to the contact point stated in the part about contact data.

#### F. PRIVACY STATEMENT (shareholders, business partners, statutory bodies)

This Privacy statement applies to you and your personal data because you are a shareholder of an entity within TMR Group. Our company acts as the data controller at the processing of your personal data. For the purposes of this privacy statement, the entity of TMR Group of which you are a shareholder or a business partner or a statutory body (controller) is responsible for the protection of your personal data. This statement explains how we will use the personal data which we obtain from you during your relation to a company within TMR Group. We point out that since this statement applies to all TMR Group, some minor local differences in the way of processing for individual purposes can occur. If you want to obtain detailed information, please contact our local person responsible for the protection of personal data (see below).

We can update this statement occasionally and we will inform you if it occurs. This version of the statement was issued 25<sup>th</sup> May 2018.

#### 1. Types of personal data

We process the following data:

- **Personal contact data.** For instance, your name, address, e-mail address, telephone number.
- **Work contact data.** For instance, company address, work e-mail address and telephone number.
- **Personal data.** For instance, gender, marital status, the date of birth, nationality and birth certificate number (national identification number), photography, identity card number.
- **Contract data.** For instance, the content of contractual relation, the content of partnership agreement, the content of Deed of Incorporation, the content of shareholder agreement etc.
- **Information about family members.** For instance, emergency contact, the contact for tax payment and the exercise of tax concessions.
- **Payment information.** For instance, the bank account number, applications for refunding of expenses and payments.

- **Details about your position.** For instance, the title of your position, authorisations and responsibilities, the type of shares you own, the amount of your shares.
- **Information relating to remuneration, pension security and other benefits.** For instance, your wages, arranged bonuses, company car, pension security scheme, rewards and claims.
- **Details relating to the performance of activities.** For instance, the presence at voting, voting at general assemblies, the presence at talks and meetings, the performance of your rights as a shareholder/business partner etc.
- **Entrusted property.** Information about the company property which was provided to you for using, such as a company mobile phone or laptop.
- **Data about correspondence or communication.** For instance, e-mail correspondence in the case you are a statutory body.
- **Digital access rights.** Your access rights to various applications within IT infrastructure in one of the TMR Group companies.
- **Information relating to safety.** For instance, the number of your access card, the information about the fact whether you are present in the building, and recordings of CCTV cameras.

## 2 Purposes of the personal data processing

The data controller will process your personal data for the following purposes:

- **Administration relating to the performance of work activity.** We keep personal records about all meetings, general assemblies, voting in the minutes, about submitting of proposals and requests, about the performance of rights, in the way it is directed in special regulations. The performance of legal obligations of the data controller is the legal basis.
- **Payment of bonuses and provision of other benefits.** We process your personal data to be able to pay you bonuses and provide you with other benefits (connected with your post alternatively with your performance). The contractual relation in which you are a contract party is the legal basis.
- **Taxes and social insurance.** We are obliged to process some specific personal data for the purpose of the execution of the obligations following the tax law and other regulations relating to social welfare and insurance. The legal obligation of the contract party is the legal basis.
- **Ensuring of communication and information technologies.** We provide you with IT facilities and services which you need to perform your obligations, for instance, a company mobile phone or an e-mail account. We must process your personal data to be able to implement it. The contractual relation in which you act as one of the parties is the legal basis.
- **Settlement of disputes and the investigation of offences.** We are allowed to process personal data for the purposes of the settlement of disputes, complaints, or legal procedures, or in case we have a suspicion of an offence which we would like to investigate further. The legitimate interest of the data controller is the legal basis.
- **Observance of the law.** We might have to process your personal data to observe the law (for instance, comparing of your name with the names in so called lists of designated parties and the observance of act on legalisation of incomes from criminal activity etc.) The performance of the legal obligation is the legal basis for this processing.

## 3 Parties with a possible access to your personal data

The data controller is allowed to share your personal data with third parties under the following circumstances:

- We can share your personal data with the third parties which act on our behalf, for instance, with a provider of services. V such cases, the third parties can use your personal data only for above-mentioned purposes and only in accordance with our instructions;
- Our employees will have access to your personal data. In that case the access will be approved only if it is necessary for above-mentioned purposes and only if the employee is bound by the confidentiality obligation;
- If the law or a court order requires it, we can share your personal data, for instance, with our suppliers or clients, tax authorities, social welfare authorities, law enforcement authorities, or other governmental bodies.

## 4 Location of your personal data

Your personal data will be located exclusively within EU and EEA countries.

**5 Storage of personal data**

We store your personal data for a limited time period and when they are not needed for the purposes of processing any more, the data will be erased. In most cases it means that we store your personal data for the time of your relation with a company within TMR Group. If it is possible, we will erase your data even during the relation as soon as they are not needed any more. In any case, we will erase your personal records pursuant to special legal regulations (for instance, act on archiving and registry, act on income tax, etc.) and those data which are not stated in the regulation we will erase not later than two years after the termination of your relation to the TMR Group company unless another local legislation requires their longer storage.

We can process your personal data for a longer time period after the completion of your relation with the TMR Group company in case of ongoing legal dispute or if you have provided us with the consent for a long-term storage of your personal data.

**6 Legal bases for the personal data processing**

In most cases, we process your personal data on the basis of the necessity of the processing for the performance of the legal obligation or our legitimate interest. We will also have to process your personal data for the performance of contractual obligations in relation to you, for instance, in the case of payment of bonuses of benefits relating to your activity or post. Finally, we can ask you for your consent in some cases. In that case, you have the possibility to withdraw it anytime.

**G. RIGHTS OF THE DATA SUBJECTS**

It is important for you to understand that those are your personal data we process and that we want you to be aware of the fact. Even if we do not need your consent to process your personal data, you have a lot of rights in connection with the processing of them.

**Your rights**

**What does it mean?**

Right to access

You can require to be informed how we process your personal data including the information about:

- the reason why we process your personal data
- what categories of personal data we process
- with whom we share your personal data
- how long we store your personal data or what criteria we exercise to determine the time limit
- what rights you have
- from where we obtain your personal data (if we have not obtained them from you)
- if processing includes automated decision-making (so called profiling)
- if your personal data have been transferred to a country outside EEA, how we ensure your personal data protection.

All the above-mentioned information is available in these Principles of the Personal Data Protection.

You can also ask for a copy of your personal data which we process. However, additional copies will be chargeable.

Right to remedy

It is important for us to have accurate information about you and we request you to inform us if any of your personal data is incorrect, for instance, if you have changed your name or if you have moved.

Right to erasure

If we process your personal data in an illegal way, for instance, if we process them longer than it is necessary or if we do it groundlessly, you can ask us for their erasure.

Right to restriction

From the moment you have asked for remedy of your personal data, or if you have objected to the processing and until we can look into the problem or confirm the accuracy of your personal data (or change them according to your instructions), you are entitled to restricted processing. It means that we can

	process your personal data only in accordance with your consent (with the exception of their storage) if it is necessary in connection with legal claims to the protection of somebody else 's rights or if there exists a significant public interest in the processing.
Right to object	You can also require restriction of the processing of your personal data if the processing is illegal, but you do not want us to erase your personal data. If you suppose that we do not have the right to process your personal data, you can object to our processing. In such cases we can continue to process them only if we are able to prove persuasive legitimate reasons which prevail your interests, rights and freedoms. But we can always process your personal data if it is necessary for determination, exercise and defence of legal claims.
Right to data portability	You can demand your personal data, which you have provided us for processing based on your consent or for the contract performance, to be provided in structured commonly used and computer-readable format. You also have the right to require portability of the information to another data controller.
Right to withdraw your consent	You have the right to withdraw your consent and subsequently we will stop our processing activities based on this legal ground.

We will also inform other parties to which we were allowed to provide your data about your request/requests.

In case of any doubts you have the right to lodge a proposal for initiation of the procedure under section 100 of Act on personal data protection in the corresponding supervisory body, for instance, via [www.dataprotection.gov.sk](http://www.dataprotection.gov.sk).

#### **How can I lodge a complaint regarding the use of my data? Or how can I exercise my rights?**

If you want to lodge a complaint about the way how we process your personal data, also in relation to the aforesaid rights, you can address our person who is responsible for the supervision of the personal data protection, that is the Data Protection Officer (DPO), and your complaints and requests will be inspected.

The contact to our Data Protection Officer: [privacy@tmr.sk](mailto:privacy@tmr.sk).

If you are not satisfied with our reply or if you suspect that we process your personal data unfairly or illegally, you can complain to the supervisory body which is the Data Protection Commission (DPC). For further information about the Data Protection Commission and their procedures how to lodge a complaint visit [www.dataprotection.gov.sk](http://www.dataprotection.gov.sk).

#### **8 Contact data**

In case of any further questions relating to the processing of your personal data, you can contact us via Data Protection Officer (DPO). Please, send your e-mail to the following address: [privacy@tmr.sk](mailto:privacy@tmr.sk).