

## **Statement on personal data protection at Telegrafia, a.s., Košice**

Telegrafia a.s., Košice (“Telegrafia”) considers personal data protection to be of the utmost importance and considers it necessary to inform the public as to how it processes personal data, why it collects such data and what that means for data subjects. As such Telegrafia hereby publishes this document in accordance with its obligations under Regulation (EU) 2016/679 of the European Parliament and of the Council and Act No 18/2018 on Personal Data Protection and on amendment of certain acts.

This document contains information concerning the purpose of processing, conditions of collection, processing itself, the provisioning of personal data, recipients, the transmission of personal data and the rights of data subjects (natural persons whose personal data is processed in Telegrafia’s information systems).

### **Information on the conditions of processing**

- provides an overview of how Telegrafia obtains and processes personal data and provides details as to the rights of data subjects under the General Data Protection Regulation (GDPR),
- is focused on natural persons or are current or future clients, visitors, vendors, natural persons representing or acting on behalf of legal entities, participants in events organised by Telegrafia, potential employees, contractual partners or other persons in written contact with Telegrafia,
- contains information on when Telegrafia shares personal data with other entities (recipients), such as service providers, vendors and brokers.

### **What is personal data?**

Personal data encompasses all information concerning data subjects capable of identifying or potentially identifying them as a specific individual. Such data includes first name, last name, address or birth number and even video recordings.

### **Controller**

Telegrafia processed personal data in its information systems as a controller under the provisions of Article 4 (7) GDPR. When processing personal data, Telegrafia shall respect the principles of legality, fairness and transparency, the principle of limited use, the principle of data minimisation and the minimisation of data retention, and the principle of accuracy.

**Data protection officer**

The data protection officer is a management-level employee at Telegrafia. The data protection officer answers questions related to the information contained in this document. The data protection officer may be reached at the following email address: [GDPR@telegrafia.sk](mailto:GDPR@telegrafia.sk)

Or by mail at: Telegrafia, a.s., Zodpovedná osoba (Data Protection Officer), Lomená 7, 040 01 Košice.

**Why do we process personal data?**

Telegrafia only processes personal data in the scope necessary to accomplish the purposes of such processing. The purposes of processing personal data include:

- payroll and human resources,
- accounting records – agreements, invoices and other documents,
- records of business partners – business cards, quotations, contact details and other documentation,
- promotional purposes – newsletter, Instagram, website and other media, corporate magazine, photos, documentation, promotional materials containing personal data,
- maintenance of official records – the logs of sent and received mail, files and other documentation,
- reporting of anti-social activities,
- maintenance of visitor records – processing of the personal data of data subjects (visitors to the controller's facilities) to identify such natural person and to grant them access to the building,
- corporate agenda – forms, agreements, contracts, files, documentation,
- cookies – the controller's website, records and other documentation,
- competitions for consumers – preparation, organisation and implementation of promotional competitions and processing the related agenda
- purchase and sale of goods and services over the Internet,
- records and liquidation of claims,
- resolving complaints and requests,
- hiring processes to fill open positions, for students to gain practical experience,
- protection of health, safety and property,
- obtaining contact details from data subjects, including first name, last name, address, email and other details for postal or phone communications,
- archiving and statistical purposes.

Other personal data processing purposes may be specified in the individual agreements concluded by Telegrafia and a data subject, for instance in agreements with authors, in license agreements or in purchase agreements.

Telegrafia may process personal data based on consent and in such case the purpose for personal data processing is specified directly in such consent.

Personal data may be provided to Telegrafia on documents, and forms and in papers and notifications, as well as in phone calls and in electronic communication between Telegrafia and the data subject. Telegrafia's legitimate interest may not outweigh the interests of the data subject, including their basic rights and freedoms.

**With whom does Telegrafia share personal data?**

1. Telegrafia is authorised to delegate the processing of personal data to another processor. If Telegrafia uses a processor to obtain or otherwise process personal data, it only does so based on a written agreement with the processor under Article 28 GDPR. Telegrafia is careful in selecting its contractual partners and carefully evaluates their reliability and contractually secures personal data protection rights.
2. Telegrafia may be obliged, depending on the specific type of personal data, to provide such personal data to other entities, for instance the authorities in other countries, the Social Insurance Administration and the police.
3. Parcels are sent within Telegrafia using the Slovak Postal Service (Slovenská pošta) or a courier service.

**Transmission of personal data to third countries**

Telegrafia does not transmit personal data to third countries.

**How long is personal data processed?**

1. Telegrafia respects the principle of minimising the period in which personal data is stored.
2. Telegrafia has an established set of archiving rules and retention periods for documents under the approved archiving plan.
3. Personal data of candidates for employment at Telegrafia are deleted immediately upon the end of the selection process, except when such candidates give Telegrafia consent to store this data for a 12-month period.

**What are the rights of data subjects?**

A data subject has:

- the right to information provided by Telegrafia as to if it processes their personal data and the right to access their personal data,
- the right to request that Telegrafia correct their personal data or delete such personal data without any undue delay,
- the right to request that Telegrafia limit the processing of their personal data,
- the right to object to the processing of their personal data on the grounds of their specific situation,
- the right to transfer their data if Telegrafia processes their data under an agreement or consent.

**Right to revoke consent**

If Telegrafia processes personal data based on consent, the data subject has the right to revoke such consent at any time.

**Right to file a complaint with the supervising authority**

If the data subject exercises any or all of their rights to data protection and believes or is concerned based on the processing of their personal data that such rights were not handled appropriately, they have the right to file a petition to initiate a personal data protection procedure with the Office for Personal Data Protection of the Slovak Republic.

**Information on the obligation to provide personal data**

If Telegrafia processes personal data under a specific law, such personal data must be provided. If personal data is necessary to accomplish an agreement and the data subject is a contracting party, Telegrafia may process their personal data without consent, and refusal to provide such personal data may result in Telegrafia's refusal to conclude such agreement. Likewise, Telegrafia may refuse to resolve a submission under a specific law, if such person does not fulfil their statutory obligations and fails to provide their personal data for such purposes.

**Automatic decision-making, including profiling**

Telegrafia does not conduct any automated individualised decision-making.

*In Košice, 24.05.2018*