

as the operator of an information system, publishes this personal data protection statement titled

PRIVACY POLICY

in accordance with Article 13 and subsequent articles of the Regulation of the European Parliament and the Council (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the “Regulation”) and the Act No. 18/2018 Coll. on personal data protection and on amendments to certain acts (hereinafter referred to as the “personal data protection act”)

The purposes of processing personal data are the reasons for which personal data of affected individuals (employees, clients) are processed in our information systems on precisely defined legal bases. The purposes are specifically determined, explicitly stated, and justified, while the processing of personal data of affected individuals adheres to the principle of legality according to Article 6 and 9 of the Regulation (individual purposes and legal bases are specified in the annex of these Principles of personal data protection).

Affected individuals, whose personal data are processed in our information systems for specifically defined purposes, may exercise the following rights in writing or electronically:

1. The right of access to personal data – it is the right to obtain confirmation of whether your personal data are being processed as well as the right to access these data, including the scope of purposes and duration of processing, categories of affected personal data, the circle of recipients, about procedures in each automatic processing, and possibly about the consequences of such processing. As an operator, we have the right to use all reasonable measures to verify the identity of the affected individual requesting access to data, especially in connection with online services and identifiers (Article 15, Recital 63, 64 of the Regulation).
2. The right to rectification of incorrect and completion of incomplete personal data (Article 16, Recital 65 of the Regulation).
3. The right to erasure – the "right to be forgotten" of those personal data that are no longer needed for the purposes for which they were collected and processed; when withdrawing consent, based on which the processing is carried out; in case of illegal processing; if personal data were acquired in connection with the offer of information society services (in case of children), and under conditions specified in Article 17, Recital 65, 66 of the Regulation.

4. The right to restriction of processing can be exercised if, as an affected person, you contest the accuracy of personal data and other specifics according to Article 18, Recital 67 of the Regulation, in the form of temporary transfer of selected personal data to another processing system, restricting access of users to selected personal data, or temporary removal of processing.
5. The right to data portability is the right to transfer personal data you have provided to our information systems based on consent or contract fulfillment to another operator in a structured, commonly used, and machine-readable format, if technically feasible and under the conditions of Article 20, Recital 68 of the Regulation, in the case that processing is carried out by automated means. The exercise of this right does not affect Article 17 of the Regulation. The right to data portability does not apply to processing necessary to perform a task carried out in the public interest or in the exercise of official authority vested in us as an operator.
6. Without prejudice to any other administrative or judicial remedy, as an affected person, you have the right to lodge a complaint with the Personal Data Protection Office of the Slovak Republic, if you believe that the processing of personal data relating to you is contrary to the Regulation or the personal data protection act.

As an affected person, you also have the right to object at any time for reasons relating to your particular situation against the processing of your personal data, also if the processing is necessary for the purposes of legitimate interests pursued by us as an operator or a third party (except for processing carried out by public authority bodies in the performance of their tasks), except in cases where your interests or fundamental rights and freedoms requiring the protection of personal data prevail (especially if the affected person is a child).

Road Brothers s.r.o., Jána Husa 1460/23, Trebišov 07501, as an operator of the information system, has adopted all appropriate personnel, organizational, and technical measures to ensure maximum protection of your personal data in order to minimize the risk of their misuse, leakage, etc. In accordance with our obligations under Article 34 of the Regulation, we inform you, as affected individuals, that if there is a situation where we as an operator violate the protection of your personal data in a way that is likely to result in a high risk to the rights and freedoms of natural persons, we will notify you of this fact without undue delay!

WARNING: due to the principle of minimization, all personal data you provide are a necessary legal or contractual requirement for fulfilling the purpose of their processing. Failure to provide mandatory data necessary for the conclusion of a contract may result in the non-conclusion of a contractual relationship.

Should you have any questions related to the protection of your personal data, including the exercise of your rights under the Regulation and the personal data protection act, please contact us at: office@roadbrothers.sk

1 EMPLOYEE PERSONNEL AGENDA	
Purpose of personal data processing	Fulfillment of employer's obligations related to employment or a similar relationship (such as based on agreements on work performed outside of employment) including the agenda of occupational health services, the agenda of enhancing employee qualifications, and pre-contractual relationships. Within the scope of the respective information system, the main purpose is fulfilled through: <ul style="list-style-type: none"> a) management of personal employee records in an employment or similar legal relationship, b) processing of agendas related to the hiring of employees into employment and the termination of employment, c) processing necessary statistical reports, d) comprehensive provision of primary health care for employees in the workplace according to current legislation for the prevention of occupational diseases, workplace injuries, and maintaining the work and functional capacity of employees during their employment (work capability).
Name of the information system	Employee Personnel Agenda
Legal Basis	<p>Human Resources:</p> <p>The legal basis for the processing of personal data includes the Constitution of the Slovak Republic, Act No. 311/2001 Coll., Labor Code, as amended, Act No. 552/2003 Coll., on the performance of work in the public interest, as amended, Act No. 553/2003 Coll., on remuneration of certain employees in the performance of work in the public interest, as amended, Act No. 595/2003 Coll., on income tax, as amended, Act No. 563/2009 Coll., on tax administration (tax code) and amending certain laws, as amended, Act No. 461/2003 Coll., on social insurance, as amended, Act No. 600/2003 Coll., on child allowance and amending Act No. 461/2003 Coll., on social insurance, as amended, Act No. 462/2003 Coll., on income replacement during temporary incapacity of an employee, as amended, Act No. 580/2004 Coll., on health insurance and amending certain laws, as amended, Act No. 650/2004 Coll., on supplementary pension savings, as amended, Act No. 448/2008 Coll., on social services, as amended, Act No. 5/2004 Coll., on employment services, as amended, Act No. 82/2005 Coll., on illegal work and illegal employment, as amended, the Act on Personal Data Protection and related legal regulations in force, Act No. 152/1994 Coll., on the Social Fund and amending Act No. 286/1992 Coll., on income taxes, as amended, Act No. 43/2004 Coll., on old-age pension savings, Act No. 355/2007 Coll., on the protection, support, and development of public health and amending certain laws, as amended, Act No. 570/2005 Coll., on military duty and amending certain laws, as amended, Act No. 283/2002 Coll., on travel allowances and amending certain laws, as amended, Act No. 233/1995</p>

	<p>Coll., on court executors and execution activity (Execution Order) and amending further laws, Act No. 576/2004 Coll., on healthcare, services related to the provision of healthcare, and amending certain laws, as amended.</p> <p>Enhancing employee qualifications: Act No. 124/2006 Coll., on safety and health protection at work and amending certain laws, as amended, Regulation No. 500/2006 Coll. issued by MPSVaR, which establishes the form for the Record of registered workplace accident, Act No. 314/2001 Coll., on fire protection, as amended, and its implementing regulations, Act No. 355/2007 Coll., on the protection, support, and development of public health and amending certain laws, as amended..</p>
Categories of Recipients	public authorities, state and public administration bodies according to relevant legal regulations, Health Insurance Companies, supplementary pension savings funds, supplementary management companies..
Cross-border Transfer of Personal Data	Not carried out
Deadlines for Deletion of Personal Data	3 to 10 years, personal files – until the employee's 70th year of life
Information on the Existence of Automated Decision-Making Including Profiling	Not carried out
Categories of Affected Persons	job applicants, employees, spouses of employees, dependent children of employees, parents of dependent children of employees, close persons, former employees..
2 EMPLOYEE PAYROLL AGENDA	
Purpose of personal data processing	<p>Fulfillment of employer's obligations related to employment or a similar relationship (such as based on agreements on work performed outside of employment). Within the scope of the respective information system, the main purpose is also fulfilled through:</p> <ul style="list-style-type: none"> a) processing necessary statistical reports, b) execution of payroll processing and maintaining the relevant records in accordance with payroll regulations, c) making deductions from wages to the state and other entities according to relevant laws, d) preparation of documentation for creating a budget in the area of wages, e) management of payroll agenda for the employees of the information system operator for purposes related to employment law, payroll, and for purposes of sickness, health, and social security, and income tax from dependent activity of natural persons in an employment relationship in accordance with the Labor Code, and managing the agenda for their remuneration and related actions..
Name of the Information System	Employee Payroll Agenda

Legal Basis	<p>Wages:</p> <p>The legal basis for processing personal data includes the Constitution of the Slovak Republic, Act No. 311/2001 Coll., Labor Code, as amended, Act No. 552/2003 Coll., on the performance of work in the public interest, as amended, Act No. 553/2003 Coll., on the remuneration of certain employees in the performance of work in the public interest and amending certain acts, as amended, Act No. 595/2003 Coll., on income tax, as amended, Act No. 563/2009 Coll., on tax administration (tax code) and amending certain acts, as amended, Act No. 461/2003 Coll., on social insurance, as amended, Act No. 600/2003 Coll., on child allowance and amending Act No. 461/2003 Coll., on social insurance, as amended, Act No. 462/2003 Coll., on income compensation during temporary incapacity of an employee and amending certain acts, as amended, Act No. 580/2004 Coll., on health insurance and amending certain acts, as amended, Act No. 650/2004 Coll., on supplementary pension savings, as amended, Act No. 448/2008 Coll., on social services, as amended, Act No. 5/2004 Coll., on employment services, as amended, Act No. 82/2005 Coll., on illegal work and illegal employment, as amended, the Personal Data Protection Act and related legal regulations in force, Act No. 152/1994 Coll., on the Social Fund and amending Act No. 286/1992 Coll., on income taxes, as amended, Act No. 43/2004 Coll., on old-age pension savings, Act No. 355/2007 Coll., on the protection, support, and development of public health and amending certain acts, as amended, Act No. 570/2005 Coll., on military obligation and amending certain acts, as amended, Act No. 283/2002 Coll., on travel allowances and amending certain acts, as amended, Act No. 233/1995 Coll., on court executors and execution activity (Execution Order) and amending further acts, Act No. 576/2004 Coll., on healthcare, services related to healthcare provision, and amending certain acts, as amended.</p>
Categories of Recipients	public authorities, state and public administration bodies according to relevant legal regulations, Health Insurance Companies, supplementary pension savings funds, supplementary management companies
Cross-border Transfer of Personal Data	Not carried out
Deadlines for Deletion of Personal Data	3 to 10 years, personal files – until the employee's 70th year of life
Information on the Existence of Automated Decision-Making Including Profiling	Not carried out

Categories of Affected Persons	job applicants, employees, spouses of employees, dependent children of employees, parents of dependent children of employees, close persons, former employees.
3 EMPLOYEE OCCUPATIONAL SAFETY AND HEALTH AGENDA	
Purpose of Personal Data Processing	Fulfillment of employer's obligations related to employment or a similar relationship (such as based on agreements about work performed outside of employment) including the agenda of safety and health protection at work. Within this information system, the main purpose is also achieved through comprehensive occupational safety and health (OSH) security and related actions such as maintaining records and registration of workplace accidents, as well as records from conducted inspections of OSH regulation compliance, employee training, and similar activities.
Name of the Information System	Employee Occupational Safety and Health (OSH) Agenda
Legal Basis	OSH: Act No. 124/2006 Coll. on safety and health protection at work and amending certain laws, as amended, Regulation No. 500/2006 Coll. by MPSVaR, which establishes the form for the Record of Registered Workplace Accident, Act No. 314/2001 Coll. on fire protection, as amended, and its implementing regulations.
Categories of Recipients	public authorities, state and public administration bodies according to relevant legal regulations.
Cross-border Transfer of Personal Data	Not carried out
Deadlines for Deletion of Personal Data	5 to 10 years
Information on the Existence of Automated Decision-Making Including Profiling	Not carried out
Categories of Affected Persons	employees, former employees.
4 ECONOMIC AND ACCOUNTING AGENDA	
Purpose of Personal Data Processing	Processing of personal data of individuals who engage in payment transactions with the operator. This information system also includes the processing of orders, received invoices, and invoicing to customers, interactions with banks, cash register management, securing cash income and expenses, inventory management, recording of investment assets (including automatic depreciation) and minor assets, management of single/double-entry accounting of the organization..
Name of the Information System	Economic and Accounting Agenda
Legal Basis	Constitution of the Slovak Republic, Act No. 460/1992 Coll., as amended, Commercial Code, Act No. 513/1991 Coll., as amended, Act No. 431/2002 Coll., on accounting, as amended, Act No. 222/2004 Coll., on value-added tax, as amended, the Personal Data Protection Act and related legal regulations in force, Act No. 145/1995 Coll., on administrative fees, as amended, Income Tax Act, Act No.

	595/2003 Coll., as amended, Social Insurance Act, Act No. 461/2003 Coll., as amended, Tax Administration Act, Act No. 563/2009 Coll., as amended, Civil Code, Act No. 40/1964 Coll., as amended, Act No. 152/1994 Coll., on the Social Fund and amending Act No. 286/1992 Coll., on income taxes, as amended, Labor Code, Act No. 311/2001 Coll., as amended, Old-Age Pension Savings Act, Act No. 43/2004 Coll., as amended, Health Insurance Act, Act No. 580/2004 Coll., and the amendment of the Insurance Act, Act No. 95/2002 Coll., as amended, Local Taxes and Fees Act, Act No. 582/2004 Coll., on local taxes and local fee for municipal and minor construction waste, as amended, Travel Allowances Act, Act No. 283/2002 Coll., as amended..
Categories of Recipients	- State administration bodies, public authorities, and public administration according to relevant legal regulations.
Cross-border Transfer of Personal Data	Not carried out
Deadlines for Deletion of Personal Data	5 to 10 years
Information on the Existence of Automated Decision-Making Including Profiling	Not carried out
Categories of Affected Persons	Individuals – employees of the operator, suppliers and customers – individuals, employees of suppliers and customers, representatives of suppliers and customers.
5 LEGAL RELATIONS	
Purpose of Personal Data Processing	To ensure the management of legal affairs (e.g., first-instance proceedings, handling appeals, handling court disputes, representation in legal matters, enforcement of decisions on damages compensation, recovery of damages, enforcement of contractual obligations, proposing measures with organizational and legal impact, etc.).
Name of the Information System	IS Legal Relations
Legal Basis	Constitution of the Slovak Republic, Act No. 460/1992 Coll., as amended, Civil Code, Act No. 40/1964 Coll., as amended, Act No. 160/2015 Civil Litigation Code, as amended, Act No. 161/2015 Coll., Civil Non-Contentious Proceedings Code, Act No. 162/2015 Coll., Administrative Judicial Code, as amended, Criminal Code, Act No. 300/2005 Coll., Criminal Procedure Code, Act No. 301/2005 Coll., Administrative Procedure Code, Act No. 71/1967 Coll., Act No. 233/1995 Coll. on court executors and execution activities (Execution Order) and amending certain laws, as amended, Act No. 7/2005 Coll. on bankruptcy and restructuring and amending certain laws, as amended, Act No. 153/2001 Coll. on the prosecution service, as amended, Act No. 372/1990 Coll. on misdemeanors, currently in force, - Act No. 586/2003 Coll. on Advocacy and amending Act No. 455/1991 Coll. on Trade Licensing (Trade Licensing

	Act), as amended, Personal Data Protection Act and related legal regulations currently in force.
Categories of Recipients	<ul style="list-style-type: none"> - intermediaries - judicial authorities - executor offices - state administration bodies, public authorities, and public administration according to relevant legal regulations.
Cross-border Transfer of Personal Data	Not carried out
Deadlines for Deletion of Personal Data	5 to 10 years after the termination of the contractual relationship
Information on the Existence of Automated Decision-Making Including Profiling	Not carried out
Categories of Affected Persons	<ul style="list-style-type: none"> - employees of the information system operator, - debtors, - opposing parties in disputes, - other individuals in the position of proceeding participants.
6 MANAGEMENT OF REGISTRY, RECORDING OF INCOMING AND OUTGOING MAIL	
Purpose of Personal Data Processing	To ensure the management of the registry as proper record keeping (maintaining complete and accurate records in the registry journal, managing record registers and indexes), proper disposal of files (records), ensuring planned disposal of files (records) that are no longer needed for further activity and whose retention periods have expired, recording of incoming and outgoing mail, and recording of electronic mail..
Name of the Information System	IS Management of Registry, Record of Incoming and Outgoing Mail
Legal Basis	Act No. 395/2002 Coll., on Archives and Registries, Act No. 305/2013 Coll., on the Electronic Form of Performance of Public Authority Functions and on Amendments to Certain Acts (e-Government Act).
Categories of Recipients	<ul style="list-style-type: none"> - intermediary, - state administration bodies, public authorities, and public administration according to relevant legal regulations.
Cross-border Transfer of Personal Data	Not carried out
Deadlines for Deletion of Personal Data	In accordance with the Registry Order and the Registry Plan of the operator.

Information on the Existence of Automated Decision-Making Including Profiling	Not carried out
Categories of Affected Persons	- affected individuals within all purposes of personal data processing defined by the operator.
7 CORPORATE MANAGEMENT AGENDA	
Purpose of Personal Data Processing	Management of the company's records, maintaining records of its representatives, owners, maintaining records of the commercial and trade register, drafting contracts, declarations of honor, preparation and securing of authorizations, powers of attorney, licenses, and permits, ensuring the payment of contributions, fees, bonuses, etc.
Name of the Information System	IS Corporate Management Agenda
Legal Basis	Commercial Code, Act No. 513/1991 Coll., as amended.
Categories of Recipients	- state administration bodies, public authorities, and public administration according to relevant legal regulations.
Cross-border Transfer of Personal Data	Not carried out
Deadlines for Deletion of Personal Data	10 years after the purpose of processing has concluded.
Information on the Existence of Automated Decision-Making Including Profiling	Not carried out.
Categories of Affected Persons	- members of the company's management.

8 SELF-EMPLOYED PERSONS RECORDS (SZČO)	
Purpose of Personal Data Processing	Preparation and management of supplier-customer relationships with self-employed individuals. Within this agenda, contractual relationships, invoices, and orders are maintained, as well as records of deliveries and withdrawals of goods, services, etc.
Name of the Information System	Self-Employed Persons Records (SZČO)
Legal Basis	Contract between the operator and SZČO authorized by the Constitution of the Slovak Republic, the Civil Code, the Commercial Code, Act No. 455/1991 Coll., the Trade Licensing Act (živnostenský zákon), and related legal regulations..
Categories of Recipients	State administration bodies, public authorities, and public administration according to relevant legal regulations.
Cross-border Transfer of Personal Data	Not carried out
Deadlines for Deletion of Personal Data	10 years after the termination of the contractual relationship for accounting purposes.
Information on the Existence of Automated Decision-Making Including Profiling	Not carried out
Categories of Affected Persons	- Customer/supplier – self-employed individual

9 RECORDS OF SUPPLIERS' AND CUSTOMERS' REPRESENTATIVES	
Purpose of Personal Data Processing	Management of a database of representatives, specifically employees of suppliers and customers, for fulfilling their work, service, and functional duties, and ensuring smooth supplier-customer relationships.
Name of the Information System	Records of Suppliers' and Customers' Representatives
Legal Basis	§ 78 (3) of Act No. 18/2018 Coll., on the Protection of Personal Data and on Amendments to Certain Acts
Categories of Recipients	None
Cross-border Transfer of Personal Data	Not carried out
Deadlines for Deletion of Personal Data	Within 30 days from the termination of the supplier-customer relationships
Information on the Existence of Automated Decision-Making Including Profiling	Not carried out.
Categories of Affected Persons	- Individual - representative (employee) of supplier, customer
10 EXERCISING THE RIGHTS OF DATA SUBJECTS	
Purpose of personal data processing	Processing requests from individuals aimed at exercising their rights as data subjects according to Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.
Name of the information system	IS Exercising the Rights of Data Subjects
Legal Basis	Art. 6, para. 1, item c), in accordance with Art. 15 to 22 and 34 of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.
Categories of Recipients	- governmental bodies, public authorities, and public administration according to relevant legal regulations
Cross-border Transfer of Personal Data	Not carried out
Deadlines for Deletion of Personal Data	1 year from the date of processing the request
Information on the Existence of Automated Decision-Making Including Profiling	Not carried out
Categories of Affected Persons	- A natural person who, as a data subject for purposes defined by the controller, approaches the controller with a request to exercise their rights
11 CONTRACTUAL RELATIONSHIPS – lease agreements	
Purpose of personal data processing	The purpose of processing personal data within this agenda is the preparation and management of contractual relationships in the field of leasing real and movable property of the operator to natural persons. It also involves monitoring compliance with legal regulations, handling legal matters, providing legal advice, and examining and preparing

	contractual relationships - lease agreements. Subsequently, the right to fulfill contractual obligations and property penalties, rights to compensation for damages, etc., may be exercised.
Name of the information system	Contractual Relationships – Lease Agreements
Legal Basis	Constitution of the Slovak Republic, Civil Code, Commercial Code, Act No. 455/1991 Coll. on Trade Licensing (Trade Licensing Act) and related legal regulations.
Categories of Recipients	- state administration bodies, public authorities, and public administration according to relevant legal regulations
Cross-border Transfer of Personal Data	Not carried out
Deadlines for Deletion of Personal Data	Within 30 days from the end of lease relationships
Information on the Existence of Automated Decision-Making Including Profiling	Not carried out
Categories of Affected Persons	contractual party – natural person
12 CONTRACTUAL RELATIONSHIPS – confidentiality agreements	
CONTRACTUAL RELATIONSHIPS – confidentiality agreements Purpose of personal data processing	The purpose of processing personal data within this agenda is the preparation and management of contractual relationships – so-called confidentiality agreements between the operator and a natural person. It also involves monitoring compliance with legal regulations, handling legal matters, providing legal advice, and examining and preparing contractual relationships - lease agreements. Subsequently, the right to fulfill contractual obligations and property penalties, rights to compensation for damages, etc., may be exercised.
Name of the information system	Contractual Relationships – License Agreements
Legal Basis	Constitution of the Slovak Republic, Civil Code, Commercial Code, Act No. 455/1991 Coll., Trade Licensing Act and related legal regulations.
Categories of Recipients	- state administration bodies, public authorities, and public administration according to relevant legal regulations
Cross-border Transfer of Personal Data	Not carried out
Deadlines for Deletion of Personal Data	Within 30 days from the end of contractual relationships
Information on the Existence of Automated Decision-Making Including Profiling	Not carried out
Categories of Affected Persons	- contractual party – natural person
13 CONTRACTUAL RELATIONSHIPS - other	
Purpose of personal data processing	The purpose of processing personal data within this agenda is the preparation and management of various types of contractual relationships between the operator and a natural person. It also involves monitoring compliance with legal regulations, handling legal matters, providing legal advice, and examining and preparing contractual relationships - lease

	agreements. Subsequently, the right to fulfill contractual obligations and property penalties, rights to compensation for damages, etc., may be exercised.
Name of the information system	Contractual Relationships - Other
Legal Basis	Constitution of the Slovak Republic, Civil Code, Commercial Code, Act No. 455/1991 Coll. on Trade Licensing (Trade Licensing Act) and related legal regulations.
Categories of Recipients	- state administration bodies, public authorities, and public administration according to relevant legal regulations
Cross-border Transfer of Personal Data	Not carried out
Deadlines for Deletion of Personal Data	Within 30 days from the end of contractual relationships
Information on the Existence of Automated Decision-Making Including Profiling	Not carried out
Categories of Affected Persons	- contractual party – natural person
14 DEBT COLLECTION	
Purpose of personal data processing	The purpose of processing personal data within this agenda is to ensure the enforcement of claims against debtors.
Name of the information system	Information System: Debt Collection
Legal Basis	Constitution of the Slovak Republic, Act No. 233/1995 Coll. on Judicial Officers and Execution Activities (Execution Order) as amended, and Act No. 2/2017 amending and supplementing Act No. 233/1995 Coll. on Judicial Officers and Execution Activities (Execution Order) as amended.
Categories of Recipients	- employees of the operator of the IS, - debtors, - counterparties in disputes, - other natural persons in the position of participants in proceedings.
Cross-border Transfer of Personal Data	Does not occur
Deadlines for Deletion of Personal Data	5 to 10 years after the end of the contractual relationship
Information on the Existence of Automated Decision-Making Including Profiling	Not carried out
Categories of Affected Persons	- employees of the operator – debtors, - clients/customers of the operator - debtors