

PERSONAL DATA PROCESSING PRINCIPLES

These Personal Data Processing Principles govern how KONTUR, s.r.o. processes your personal data, to what extent and for what purposes. You will also learn what rights you have in relation to the processing of personal data and how to exercise them. In these Principles, the company KONTUR, s.r.o. will also be referred to as the “controller” or “we”. The controller of personal data is the one who decides for what purpose and how your personal data are processed.

Identification data of our company are:

Name:	KONTUR, s.r.o. Konečná 2, 951 12
Registered office IČO:	Ivanka pri Nitre 45 415 986
Registered in	Commercial Register of the District Court Nitra, section: Sro, insert no.: 26189/N

Contact: **gdpr@kontur-textile.eu**

Your trust is important to us, and therefore when processing personal data we ensure that your data are used transparently, securely, and only to the extent necessary to fulfill the purposes of processing.

Rights of the data subject

Rights of the data subject: When processing personal data you act as the data subject, i.e., the person whose data we process. As the data subject you have certain rights related to the processing of personal data, which allow you to obtain an overview of what data about you we process, decide on their correction or deletion, restrict their use, or object to their processing. Below is an overview of your rights that you may exercise with regard to the processing of your personal data:

- Right of access - you have the right to obtain a copy of the personal data we have about you, as well as information on how we use your personal data.
- Right to rectification - if you think that the data we hold about you are inaccurate, incomplete or outdated, please do not hesitate to ask us to amend, update or supplement this information.
- Right to erasure (right to be forgotten) - you have the right to request us to delete your personal data.
- Withdrawal of consent - in cases where we process your personal data on the basis of your consent, you have the right to withdraw this consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

- **Right to restrict processing** - under certain circumstances you are entitled to us to request that we stop using your personal data.
- Right to data portability - under certain circumstances you have the right to request us to transfer the personal data you have provided to us to another third party of your choice.
- Right to object - you have the right to object to processing of personal data based on our legitimate interests.
- **Right to lodge a complaint with the supervisory authority, namely the Office for Personal Data Protection of the Slovak Republic, if you believe we process your personal data unfairly or unlawfully.**
- **Right** that you are not subjected to **automated individual decisions including profiling.**

Special conditions for processing personal data

If providing personal data is a legal/contractual requirement, you as the data subject are obliged to provide these personal data. Failure to provide personal data necessary to conclude a contract may result in the non-signing of a contractual relationship.

If you file an objection regarding the processing of your personal data, you have the right to file a complaint or request in writing to the registered office of the controller: Konečná 2, 951 12 Ivanka pri Nitre or by email: gdpr@kontur-textile.eu.

The following text contains detailed information about the processing of personal data, particularly about the purposes of their processing, legal bases, retention periods or categories of recipients.

1. BUSINESS ACTIVITY

In connection with performing our business activities, we process personal data mainly when handling inquiries, preparing price offers, receiving orders, concluding and fulfilling contractual relationships, delivering goods or services, invoicing, complaints, and protecting our legal claims.

1.1 Requests and pre contractual communication

Purpose of processing

conducting pre contractual negotiations, assessing demand, preparing a price offer

Date of change:

Legal basis	pre-contractual relationship within the meaning of Art. 6(1)(b) of the GDPR Regulation
Category of data subjects	potential clients, the person authorized to act on behalf of a potential client, the contact person of a potential client
Category of personal data	first name, last name, title, position, e-mail, phone number, subject of the offer, identification data on the basis of which it is possible to identify the data subject, if the potential client is a PO/Sole proprietor (SZČO), to the extent of: business name, Company ID (IČO), Tax ID (DIČ), VAT ID (IČ DPH), registered office/place of business
Categories of recipients	authorized persons in a contractual relationship with the controller, technical service providers (the entity ensuring the management of IT and information systems) entities to which the controller is obliged by law to provide personal data (Public authorities)
Retention period for erasure of personal data	12 months from the last communication, if no order or contract is concluded
Transfer of personal data to third countries or international organizations	does not take place

1.2 Orders

Purpose of processing	conclusion and management of contractual relationships (orders) provision of business activities
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Date of change:

Legal basis	contractual relationship within the meaning of Art. 6(1)(b) GDPR
Category of data subjects	clients, a person authorised to act on behalf of the client
Category of personal data	first name, last name, title, phone number, e-mail, subject of the order or contractual relationship, data contained in the order, price offer, order confirmation and related business communication, data on the required performance, technical or graphical specification of the contract, data on approval of the proposal, samples or other document, delivery address, billing address, place of delivery, data on the method of delivery or collection of goods, data on payment including bank details, variable symbol or other payment identifier, as well as client identification data if the client is an individual entrepreneur or legal entity, in particular business name, company ID, VAT number, VAT ID, registered office or place of business
Categories of recipients	trusted persons in a contractual relationship with the operator, technical service providers (entity ensuring IT and information system management) entities to whom the operator is obliged to provide personal data by law (Public authorities), entities ensuring delivery or transport of goods
Retention period for personal data	10 years from the execution of the order
	not carried out

Transfer of personal data to third countries or international organizations

1.3 Client and contact person records

Purpose of processing	client and contact person records
Legal basis	legitimate interest within Art. 6(1)(f) f) GDPR Regulation. The main legitimate interest the aim is to ensure efficient communication communication with the contractual partner.
Category of data subjects	client, person authorized to act on behalf of the client of the client, client's contact person
Category of personal data	first name, surname, title, position, e-mail, phone. number, company identification details, on which through which the data subject can be identified the data subject
Categories of recipients	trusted persons in a contractual relationship with the operator, technical service providers (entity ensuring management of IT and information systems) entities to whom the controller is obliged to provide personal data by law (Authorities of public authority)
Retention period for erasing personal data	after termination of the contractual relationship
Transfer of personal data to third parties to countries or international organizations	is not carried out

Date of change:

1.4 Complaints and enforcement of legal claims

Purpose of processing	handling complaints, claims for damages, and enforcing or defending legal claims
Legal basis	contractual relationship within the meaning of Article 6(1)(b) of the GDPR Regulation, legitimate interest within the meaning of Article 6(1)(f) of the GDPR Regulation. The main legitimate interest is the enforcement or defense of legal claims arising from contractual relationships
Category of data subjects	clients, person authorized to act on behalf of the client, suppliers, person authorized to act on behalf of the supplier
Category of personal data	first name, last name, title, phone number, e-mail, subject of the contractual relationship, data, in the event that the client/supplier is a PO/Sole proprietor, this data relates to the person authorized to act on behalf of the client and at the same time the identifying data of the PO/Sole proprietor, on the basis of which the data subject can be identified to the extent of: business name, ID number (IČO), VAT number (DIČ), VAT ID (IČ DPH), registered office/place of business, information from the commercial register/sole proprietorship register), order or contract data, description of the defect, photo documentation, data on the extent of damage, communication regarding the complaint
Categories of recipients	authorized persons in a contractual relationship with the controller, technical service providers (an entity providing IT and information systems management) entities to which the controller is required by law to provide personal data (Public authorities), law firm

Date of change:

Retention period for deletion of personal data

if it concerns an insurance claim, a complaint, a court case, or another disputed matter in a commercial-law relationship, personal data are retained until the matter is finally concluded and subsequently for the period necessary to assert or defend legal claims, as a rule for no longer than until the expiry of the limitation periods under the Commercial Code; for claims for compensation for damage, no later than until the expiry of 10 years from the date of the breach of the obligation

Transfer of personal data to third countries or international organizations

is not carried out

2. ACCOUNTING AND TAX OBLIGATIONS

We process your personal data for the purpose of keeping accounting records, issuing and recording accounting documents, payment administration, and fulfilling tax and related statutory obligations.

Purpose of processing

fulfilment of statutory obligations in the field of taxes and accounting in the area of business relationships

Legal basis

statutory obligation within the meaning of Art. 6(1)(c) of the GDPR Regulation /Act No. 431/2002 Coll. on accounting, Act No. 563/2009 Coll. on tax administration (Tax Code)

Category of data subjects

clients, persons authorized to act on behalf of clients, suppliers, persons authorized to act on behalf of the supplier

Category of personal data

personal data contained in accounting, tax and payment documents, in particular first name, last name, title, email address, telephone number, registered office or place address

Date of change:

	business, delivery or invoicing address, bank account number, payment data and payment identifier, as well as identification and tax data of the contractual partner in the scope of business name, company ID, VAT number, VAT ID, registered office or place of business
Categories of recipients	tax office, entities to which the operator is obliged to provide personal data by law, entrusted persons and other persons in a contractual relationship with the operator, entity ensuring the operator's compliance with legal obligations in the accounting area, IT Administrator
Retention period for deleting personal data	10 years from fulfillment of the legal obligation
Transfer of personal data to third countries or international organizations	does not take place

3. SOCIAL NETWORKS

Purpose of processing	ensuring communication via social networks and their management
Legal basis	legitimate interest within the meaning of Art. 6(1)(f) GDPR. The main legitimate interest is ensuring effective communication
Category of data subjects	information applicants
Category of personal data	data provided during performance

Date of change:

	communication via social networks
Categories of recipients	authorized persons in a contractual relationship with the controller (in particular collaborators participating in ensuring marketing activities), technical service providers that participate in the management of social networks, entities to which the controller is required by law to provide personal data (public authorities), IT administrator, operators of social networks and online platforms on which materials are published, in particular Facebook, Instagram, LinkedIn, YouTube, entities to which the controller is required by law to provide personal data (Public authorities).
Retention period for deletion of personal data	for the duration of active use of the account on social networks, or retention rules of social network operators
Transfer of personal data to third countries or to international organizations	When using social networks (Facebook, Instagram, LinkedIn, YouTube), personal data may be transferred to third countries outside the EU/EEA, in particular to the USA. These platforms follow their own personal data protection policies and may process data also outside the territory of the European Union

4. EXERCISING RIGHTS - PROTECTION OF PERSONAL DATA

We process your data for the purpose of recording the exercised rights of data subjects (e.g. requests for deletion, access to data), as well as recording and handling notifications of breaches of personal data protection.

Purpose of processing

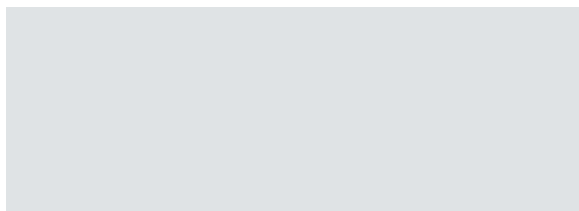
recording of exercised rights of data subjects and breaches of protection pursuant to Act No. 18/2018 Coll. on the protection of personal data and on amendment and

	amendments to certain laws, record of exercised rights of data subjects under Chapter III and notifications under Art. 33 and 34 of Regulation 2016/679 on the protection of natural persons in processing personal data and on the free movement of such data
Legal basis	legitimate interest within the meaning of Art. 6(1)(f) GDPR. The main legitimate interest is recording exercised rights and notifications of personal data protection breaches
Category of data subjects	data subjects to whom the submission for exercising the right concerns; data subjects whose personal data protection breach concerns
Category of personal data	data relating to the exercise of the right, data provided by the notifier in the notification of a breach of data protection
Categories of recipients	trusted persons in a contractual relationship with the operator, entities to which the operator is obliged to provide personal data by law
Retention period for personal data	within 6 months after the expiry of 5 years from the exercise of the right or from the occurrence of a data protection breach
Transfer of personal data to third countries or international organizations	is not carried out

5. NETWORK MANAGEMENT

We process your data to ensure network management, information and network security. This purpose serves to protect our systems and personal data from unauthorized access, malicious activity, or misuse.

Purpose of processing	ensuring network management (network security, information security)
Legal basis	legitimate interest within the meaning of Art. 6(1)(a) f) of the Regulation. The main legitimate interest is ensuring information security
Category of personal data	ordinary personal data contained in system, access, and security logs, in particular the user's identification and employment data, login name, IP address, device identifiers, date and time of access, data about network activities, and data related to a security incident
Retention period for erasure of personal data	ordinary logs for 6 months from their creation; in the case of a security incident, for the period necessary to investigate the incident and adopt corrective measures, or until the conclusion of related proceedings
Categories of recipients	entities to which the controller is legally obliged to provide personal data, authorized persons and other persons under a contractual relationship with the controller, IT administrator
Category of data subjects	clients, potential clients, persons authorized to act on behalf of clients, suppliers, persons authorized to act on behalf of suppliers, job applicants, and visitors to the website, if when using the network, information systems, electronic



communication or web services
involves recording their data in
system, access or security logs

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