

PRIVACY AND DATA PROCESSING PRINCIPLES (hereinafter also referred to as the "Principles")

We are the **DEDO Foundation**, with registered office at Hemerkova 1318/28, 040 23 Košice-Sídlisko KVP, ID No.: 306 88 388, registered in the register of non-governmental non-profit organizations, maintained by the Ministry of Interior of the Slovak Republic under No. 203/Na-96/164, ID No.: 306 88 388 (hereinafter also referred to as the "Foundation" or the "**controller**"), which as a controller processes personal data under the conditions set out below.

We value your interest in our activities and therefore we care about your privacy and are committed to protecting your personal information.

This privacy statement is intended to provide you with information about the basic principles of data protection, what kind of personal data we process, on what legal basis and for what purposes.

I.

Legal framework for personal data protection:

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 Protection Regulation) (hereinafter also referred to as "GDPR")

Act No. 18/2018 . on the Protection of Personal Data and on Amendments and Additions to Certain Acts (hereinafter also referred to as the "Act")
(The GDPR Regulation and the Act, together the "GDPR Principles")

The controller processes personal data on the following legal grounds:

- a) the data subject has consented to the processing of his or her personal data for at least one specific purpose,
- b) the processing of personal data is necessary for the performance of a contract to which the data subject is a contracting party or for the act of taking a pre-contractual measure at the request of the data subject,
- c) the processing of personal data is necessary pursuant to a special regulation or an international treaty to which the Slovak Republic is bound,
- d) the processing of personal data is necessary to protect life, health or property of the data subject or another natural person
- e) the processing of personal data is necessary for the purpose of legitimate interests of the controller or of a third party, except where those interests are overridden by the interests or rights of the data subject requiring the protection of personal data, in particular where the data subject is a child; this legal basis shall not apply to the processing of personal data by public

authorities in the performance of their duties.

Transfer of personal data: our Foundation does not transfer your personal data outside the territory of the Slovak Republic.

II.

MAIL

The purpose of processing personal data is to record incoming and outgoing mail.

Data subjects: natural persons – consignors.

List of personal data: name, surname, title, address, name of organisation, job title, e-mail address, subject and content of mail

Legal basis for processing personal data: act no. 395/2002 Coll. on archives and registers and on the amendment of certain acts, as amended

Categories of recipients: entities to which a special regulation confers the authority to decide on the rights and obligations of natural persons: courts, law enforcement authorities and intermediaries: WebSupport s. r. o., Karadžičova 7608/12 Bratislava - Ružinov 821 08, ID No.: 36421928 and intermediaries: DORKA, n. o., Hemerkova 1318/28, Košice, Czech Republic - Sídliisko KVP, 04023, ID No.: 35582171

Personal data is not transferred to third countries.

Time limits for erasure of personal data:

| | |
|-------------------------|---------|
| Ordinary correspondence | 3 years |
|-------------------------|---------|

Automated decision-making, including profiling, does not take place.

In order to comply with the principle of data minimisation, any personal data provided by you is a necessary legal requirement for the fulfilment of the purpose of its processing.

ACCOUNTING AND TAX DOCUMENTS

The purpose of processing personal data is to record accounting documents and the agenda (list of activities) associated with its processing.

Data subjects: natural persons - clients, employees

List of personal data: name, surname, title, address of permanent residence, temporary address, telephone number, e-mail address, date of birth, type and number of identity document, signature, bank account number of the natural person

Legal basis for processing personal data: Act No. 431/2002 Coll. on Accounting, as amended, Act No. 222/2004 Coll. on Value Added Tax, as amended, Act No. 40/1964 Coll. on the Civil Code, as amended, Act No. 152/1994 Coll. on the Social Fund and on amendment and supplementation of Act No. 286/1992 Coll. on Income Taxes, as amended, Act No. 311/2001 Coll. on the Labour Code, as amended, Act No. 311/2001 Coll. on the Labour Code, as amended

Categories of recipients: the Social Insurance Institution, health insurance companies, tax authorities and entities to which a special regulation confers the authority to decide on the rights and obligations of natural persons: courts, law enforcement authorities and intermediaries: PEA, s.r.o., Zimná 15, 080 01 Prešov, ID No.: 36 509 639

Personal data is not transferred to third countries.

Time limits for erasure of personal data:

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| Accounting documents | 10 years |
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Automated decision-making, including profiling, does not take place.

In order to comply with the principle of data minimisation, any personal data provided by you is a necessary legal requirement for the fulfilment of the purpose of its processing.

MARKETING

The purpose of processing personal data is to send marketing offers, newsletters and information about products or news.

Data subjects: natural persons

List of personal data: name, surname, address, email, telephone

Legal basis for processing personal data: section 13(1)(a) of Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments and Additions to Certain Acts

Categories of recipients: entities to which a special regulation confers the authority to decide on the rights and obligations of natural persons: courts, law enforcement authorities and intermediaries: WebSupport s. r. o., Karadžičova 7608/12 Bratislava - Ružinov Municipal District 821 08, ID No.: 36421928

Personal data is not transferred to third countries.

Time limits for erasure of personal data:

| | |
|-----------|---------|
| Marketing | 3 years |
|-----------|---------|

Automated decision-making, including profiling, does not take place.

The data subject shall have the right to withdraw consent to the processing of personal data concerning him or her at any time. Withdrawal of consent shall not affect the lawfulness of the processing of personal data based on consent prior to its withdrawal; the data subject shall be informed of this fact before consent is given. The data subject may withdraw the consent in the same way in which he or she gave the consent.

CONTRACTS WITH NATURAL PERSONS

The purpose of processing personal data is the preparation and conclusion of contracts with natural persons.

Data subjects: natural persons - contracting party

List of personal data: name, surname, title, address of permanent/temporary residence, account number of the natural person, name of the bank, ID number, data related to the subject of the contract

Legal basis for processing personal data: Article 6(1)(b) of the Regulation

Categories of recipients: entities to which a specific provision confers the authority to decide on the rights and obligations of natural persons: courts, law enforcement authorities

Personal data is not transferred to third countries.

Time limits for erasure of personal data:

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|-----------|----------|
| Contracts | 10 years |
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Automated decision-making, including profiling, does not take place.

In order to comply with the principle of data minimisation, any personal data provided by you is a necessary contractual requirement for the fulfilment of the purpose of its processing.

PHOTOGRAPHS

The purpose of processing personal data is to manage a database of photographs for promotional purposes.

Data subjects: Natural persons – employees, clients and participants of the controller's events

List of personal data: name, surname, title, a photograph

Legal basis for processing personal data: consent of the data subject

Categories of recipients: entities to which a specific provision confers the authority to decide on the rights and obligations of natural persons: courts, law enforcement authorities

Personal data is not transferred to third countries. Time limits for erasure of personal data:

| | |
|-------|----------|
| Photo | 10 years |
|-------|----------|

Automated decision-making, including profiling, does not take place.

The data subject shall have the right to withdraw consent to the processing of personal data concerning him or her at any time. Withdrawal of consent shall not affect the lawfulness of the processing of personal data based on consent prior to its withdrawal; the data subject shall be informed of this fact before consent is given. The data subject may withdraw the consent in the same way in which he or she gave the consent.

REGISTRATION OF MEMBERS

The purpose of processing personal data is to register members of the Board of Directors and members of the Supervisory Board.

Data subjects: natural persons - members

List of personal data: title, name and surname, place of residence, telephone number, e-mail, ID number, date of birth, generally applicable identifier - birth identification number, nationality, position held, length of the term of office

Legal basis for processing personal data: act no. 34/2002 Coll. on foundations and on amendments to the Civil Code as amended
Act No 346/2018 Coll. on the register of non-governmental non-profit organisations and on amending and supplementing certain acts

Categories of recipients: Ministry of Interior of the Slovak Republic and entities to which a specific provision confers the authority to decide on the rights and obligations of natural persons: courts, law enforcement authorities

Personal data is not transferred to third countries.

Disclosure: yes

Time limits for erasure of personal data:

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| Members | 1 year after termination of membership |
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Automated decision-making, including profiling, does not take place.

In order to comply with the principle of data minimisation, any personal data provided by you is a necessary legal requirement for the fulfilment of the purpose of its processing.

RECORDS OF VOLUNTEERING

The purpose of processing personal data is to register applications for volunteering as well as volunteer contracts.

Data subjects: natural person - interested party
natural person - volunteer

List of personal data: title, name and surname, place of residence, telephone number, e-mail, ID number, bank account number, information about education and experience, driving licence

Legal basis for processing personal data: Act No. 406/2011 Coll. on volunteering and on amendment and supplementation of certain acts

Categories of recipients: entities to which a special regulation confers the authority to decide on the rights and obligations of natural persons: courts, law enforcement authorities and intermediaries: PEA, s.r.o., Zimná 15, 080 01 Prešov, ID No.: 36 509 639

Personal data is not transferred to third countries. Time limits for erasure of personal data:

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|----------------------|----------|
| Volunteering records | 10 years |
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In order to comply with the principle of data minimisation, any personal data provided by you is a necessary legal requirement for the fulfilment of the purpose of its processing.

JOBSEEKERS

The purpose of processing personal data is to register job seekers sending their CV and supporting documents.

Data subjects: natural persons - applicants (jobseekers)

List of personal data: title, name and surname, place of residence, telephone number, e-mail, ID number, bank account number, information about education and experience, driving licence

Legal basis for processing personal data: section 13(1)(b) of Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments and Additions to Certain Acts

Categories of recipients: entities to which a special regulation confers the authority to decide on the rights and obligations of natural persons: courts, law enforcement authorities and intermediaries: PEA, s.r.o., Zimná 15, 080 01 Prešov, ID No.: 36 509 639

Personal data is not transferred to third countries.

Time limits for erasure of personal data:

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|-----|------------------|
| CVs | maximum 6 months |
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Automated decision-making, including profiling, does not take place.

In order to comply with the principle of data minimisation, any personal data provided by you is a necessary legal requirement for the fulfilment of the purpose of its processing.

CONTACT FORM

The purpose of processing personal data is to record data subjects when submitting answers to the questions asked.

Data subjects: natural persons

List of personal data: title, name and surname, e-mail

Legal basis for processing of personal data: §13(1)(a) of Act No. 18/2018 Coll. on the Protection of Personal Data, as amended

Categories of recipients: entities to which a special regulation confers the authority to decide on the rights and obligations of natural persons: courts, law enforcement authorities and intermediaries: WebSupport s. r. o., Karadžičova 7608/12 Bratislava - Ružinov Municipal District 821 08, ID No.: 36421928

Personal data is not transferred to third countries.

Time limits for erasure of personal data:

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|--------------|---|
| contact form | maximum 6 months (in case of compliance with the legal obligations or legal claims of the controller under the applicable legislation). |
|--------------|---|

Automated decision-making, including profiling, does not take place.

The data subject shall have the right to withdraw consent to the processing of personal data concerning him or her at any time. Withdrawal of consent shall not affect the lawfulness of the processing of personal data based on consent prior to its withdrawal; the data subject shall be informed of this fact before consent is given. The data subject may withdraw the consent in the same way in which he or she gave the consent.

END USER OF THE BENEFITS

The purpose of processing personal data is to register the end users of the benefits.

Data subjects: natural persons – end users of the benefits

List of personal data: first name, surname, birth identification number or date of birth, address of permanent residence or other residence, nationality, type and number of identity document, data establishing the status of final beneficiary under a special regulation

Legal basis for processing personal data: Act No. 52/2018 Coll. amending and supplementing Act . 297/2008 Coll. on the protection against the legalization of proceeds from criminal activity and on the protection against the financing of terrorism and on the amendment and supplementation of certain laws, as amended

Categories of recipients: Ministry of Interior of the Slovak Republic - Act No. 52/2018 Coll. amending Act No. 297/2008 Coll. on the protection against the legalization of proceeds of crime and on the protection against the financing of terrorism and on the amendment and supplementation of certain acts, as amended, entities to which a special regulation confers the authority to decide on the rights and obligations of natural persons (e.g. courts)

Personal data is not transferred to third countries.

Time limits for erasure of personal data:

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|--------------------------------------|---------------------------|
| Records of end users of the benefits | during the term of office |
|--------------------------------------|---------------------------|

Automated decision-making, including profiling, does not take place.

In order to comply with the principle of data minimisation, any personal data provided by you is a necessary legal requirement for the fulfilment of the purpose of its processing.

REQUESTS FROM DATA SUBJECTS TO EXERCISE RIGHTS

The purpose of processing personal data is to record and handle requests from data subjects when exercising their rights pursuant to the Regulation.

Data subjects: natural persons - data subjects / applicants

List of personal data: title, name, surname, address of permanent residence, email address

Legal basis for processing personal data. 6(1)(c) of the Regulation

Categories of recipients: entities to which a specific provision confers the authority to decide on the rights and obligations of natural persons: courts, law enforcement authorities

Personal data is not transferred to third countries.

Time limits for erasure of personal data:

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|---------|----------|
| Request | 10 years |
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Automated decision-making, including profiling, does not take place.

In order to comply with the principle of data minimisation, any personal data provided by you is a necessary legal requirement for the fulfilment of the purpose of its processing.

III.

Data subjects concerned by the processing of personal data for specifically defined purposes may exercise the following rights:

Rights of the data subject:

1. the right to information
 - under the GDPR principles
 - the most important information is set out in this statement
2. the right to request access to the personal data of the data subject
3. the right to rectification of personal data - the data subject has the right to have inaccurate personal data concerning him or her rectified by the controller without undue delay
4. the right to erasure of personal data - the data subject has the right to have personal data concerning him or her erased by the controller without undue delay
5. the right to restriction of processing personal data – in statutory cases, the data subject has the right to have the controller restrict the processing of personal data
6. the right to object to the processing of personal data - the data subject has the right to object to the processing of his or her personal data on grounds relating to his or her particular situation
7. the right to data portability - the data subject has the right to obtain the personal data concerning him or her which he or she has provided to the controller in a structured, commonly used and machine-readable format and has the right to transfer those personal data to another controller, if technically feasible, subject to other conditions laid down by law
8. the right to withdraw your consent to disclosure of personal data at any time
9. the right to file a petition for initiation of proceedings under [Section 100 of the Act](#) with the Office for Personal Data Protection of the Slovak Republic - if the data subject claims to be directly affected in respect of his/her rights under this Act
10. the right to obtain confirmation as whether personal data relating to him or her are being processed.

The above rights of the data subject are further specified in Articles 15 to 21 of the Regulation. The data subject shall exercise those rights in accordance with the Regulation and other relevant legislation. The data subject may exercise the rights against the controller by submitting a request in writing or electronically. Where the data subject requests the provision of information verbally, the information may be conveyed in such way, provided that the data subject has provided proof of his or her identity.

The DEDO Foundation has taken all appropriate personal, organisational and technical measures to protect your personal data as much as possible in order to reduce the risk of misuse. Pursuant to our obligation under Article 34 of the Regulation, we hereby notify you as data subjects that, if a situation arises where we, as the controller, breach 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 without undue delay. Legislation and the related processing of your personal data may change. If we decide to update this policy, the changes will be published on our website and you will be notified of these changes. In cases where there is a major change to this policy or if we are required to do so by law, we will inform you in advance.

We ask that you read this policy carefully and check for updates regularly when communicating with us or using our website.

If you have any questions regarding the processing of your personal data, including the exercise of the above rights, you can contact our Responsible Person provided by EuroTRADING s.r.o. (www.eurotrading.sk), by email at zo@eurotrading.sk. We will duly investigate all your suggestions and complaints and respond to you with a statement.

If you are not satisfied with our response or if you believe that we are processing your personal data unfairly or unlawfully, you may file a complaint with the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic, <https://dataprotection.gov.sk>, Hraničná 12, 820 07 Bratislava 27; telephone number: +421 /2/ 3231 3214; E-mail: statny.dozor@pdp.gov.sk.