

PERSONAL DATA PROTECTION

INFORMATION OBLIGATION GDPR 1 May 2025

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF THE DATA SUBJECT

pursuant to Art. 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR)

The Controller ARCADE spol. s r.o. regards compliance with the statutory conditions for the processing of personal data of data subjects as one of its priorities. All acts carried out at the individual stages of the personal-data-processing procedure are performed with maximum emphasis on the protection of the fundamental rights of data subjects, above all on the protection of personality and privacy, and on observance of the principles of lawful personal-data processing.

ARCADE spol. s r.o. (hereinafter also the “Controller”) processes all personal data in accordance with applicable legal regulations, with special emphasis on 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, repealing Directive 95/46/EC (GDPR) (hereinafter also the “Regulation” or “GDPR”) and Act No. 18/2018 Coll. on the protection of personal data and on the amendment and supplementation of certain acts (hereinafter also the “Act” or “Act No. 18/2018”).

This document concerns, in particular, data subjects who are not employees of ARCADE spol. s r.o. The information contained in this document constitutes information within the meaning of Art. 13 of the Regulation.

DATA ON THE CONTROLLER

Business name: ARCADE spol. s r.o.

Registered office: Námestie SNP 5, 974 01 Banská Bystrica

Company ID No.: 46968806

Tax ID No.: 2023672761

A designated person supervises the proper processing of personal data, contact details:

email: prevadzka@arcade.sk

correspondence address: address of the company’s registered office

This information is effective from 1 May 2025; the Controller is entitled to update it.

DEFINITIONS

GDPR – 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, of 27 April 2016.

Data subject – any person whose personal data are processed.

Personal data – any information relating to an identified or identifiable natural person.

Controller – a natural or legal person who has determined the manner and defined the purpose of personal-data processing.

PRINCIPLES OF PERSONAL-DATA PROCESSING

Observance of the principles of personal-data processing of customers pursuant to Art. 5 of the Regulation:

- Lawfulness of processing – every processing operation must be lawful, i.e. we possess an adequate legal basis.
- Minimisation of personal-data processing (necessity) – we process your personal data only to the extent necessary in relation to the purpose. We always consider the scope of personal-data processing.
- Minimisation of personal-data storage (disposal) – we store data in a form that allows the identification of the data subject only as long as necessary for the purposes. Your personal data are thoroughly destroyed after the purpose of processing has been fulfilled.
- Integrity and confidentiality (security) – the Controller has adopted technical, organisational and personnel measures against the loss, destruction or damage of personal data.

NECESSITY OF PROVIDING PERSONAL DATA

We necessarily need your personal data, because if they are not provided, a contractual relationship between supplier and customer cannot arise, since, pursuant to Act of the National Council of the SR No. 513/1991 Coll., the Commercial Code, as amended, your identification as a contracting party (or as a person designated by our customer – your employer – to deal with contractual matters) is one of the essential elements of the Contract. If, however, you decide not to provide us with your telephone number or email address, this does not prevent the establishment of a contractual relationship, but our mutual communication will not be as effective as if you had provided them.

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WE OBTAIN YOUR PERSONAL DATA

You most often provide your personal data to us:

- We obtain them primarily directly from you, for example from communication with you via the contact form on our website.
- If you are in the position of our customer or an interested party in our goods or services.

WHAT IS THE PURPOSE OF PROCESSING PERSONAL DATA, THE LEGAL BASIS OF THE PROCESSING ACTIVITY, AND FOR HOW LONG WE STORE YOUR PERSONAL DATA

The Controller processes your personal data as follows for the following purposes:

Name of processing operation	Purpose of personal-data processing	Category of personal data	Legal basis of processing	Retention period	Other recipients
Economic – accounting agenda	method of recording economic activity through accounts	name, surname, address of residence, business address, identification number (ID No.), VAT ID if VAT payer	obligation under applicable legislation	10 years	tax office, municipal and city offices, Slovenská pošta, other authorised entity
Register of business partners	information about the company's business partners	name, surname, email, phone	legitimate interest of the Controller	stored in a form permitting identification of the data subject as long as necessary for the business transaction	contracting parties, partners in project activities, state administration and public authorities

<p>Register of accommodated guests</p>	<p>register of accommodated guests pursuant to relevant legal regulations. Within pre-contractual relations the Controller processes personal data of persons who have booked accommodation via telephone or email order</p>	<p>name, surname, address of residence, account number, email</p>	<p>fulfilment of pre-contractual relations</p>	<p>data must be stored for 10 years pursuant to the Accounting Act and tax regulations (e.g. list of overnight stays)</p>	<p>competent state authority (e.g. local accommodation tax, mandatory report to the alien police)</p>
<p>Register of foreigners</p>	<p>fulfilment of the Controller's obligations pursuant to § 111 c of Act No. 404/2011 Coll. on the residence of foreigners in connection with the fact that the Controller also accommodates guests – foreigners. In the house book of accommodated guests the Controller records, for this purpose, the personal data of the foreigner to the statutory extent</p>	<p>name, surname, birth surname, date, place and country of birth, sex, nationality</p>	<p>statutory reason</p>	<p>personal data are stored for 5 years after the end of the stay (unless otherwise provided by legal regulation)</p>	<p>competent state authority (e.g. local accommodation tax, mandatory report to the alien police)</p>
<p>Payroll and personnel agenda</p>	<p>complete information on employees required by law as well as information on salary, leave, health status</p>	<p>name, surname, title, residence, ID card number, attendance, information for wage calculation, information on family members</p>	<p>statutory reason</p>	<p>max. 70 years</p>	<p>in case of inspection: Social Insurance Agency, Financial Directorate SR, health insurance companies</p>

Registry management	ensuring the recording, creation, storage, protection of registry records, access to them and ensuring their disposal	ordinary personal data	statutory obligation of the Controller	10 years after the end of registration	Ministry of the Interior of the SR, other authorised entity
Register of rights of data subjects	handling requests of natural persons aimed at exercising their rights	title, name, surname, address and other personal data to which the exercised right of the data subject relates	statutory obligation of the Controller	5 years from the date of handling the request	state administration bodies, public authorities according to relevant legal regulations
Handling complaints of data subjects	the purpose of processing is the submission by a natural or legal person seeking the protection of their rights or legally protected interests which they believe have been violated	ordinary personal data, other data necessary to examine the complaint	statutory obligation of the Controller	5 years after termination or expiry of the obligation	state administration bodies, public authorities according to relevant legal regulations
ANPR system functions in garages	recording vehicle registration numbers (licence plates) when entering/exiting the parking system	licence plate (vehicle registration number) – constitutes personal data if the vehicle can be assigned to a specific person (e.g. owner or tenant of a parking space)	fulfilment of pre-contractual relations, legitimate interest of the Controller	Typically 7 to 30 days (depending on purpose and security policy)	internal staff authorised to manage the car park, IT provider or ANPR system operator, law-enforcement authorities (in case of incidents or offences)
Loyalty programme	providing discounts, bonuses, loyalty programme, product information	name, surname, title, permanent residence, email, phone	consent of the data subject	for the duration of the consent	data are not further provided

<p>Marketing communication with customer</p>	<p>sales support, marketing offers, newsletter, product and news information</p>	<p>name, surname, title, permanent residence, email, phone</p>	<p>legitimate interest of the Controller</p>	<p>we will process your personal data for this purpose until you cancel your participation in the marketing list or unsubscribe from messages for direct marketing purposes (newsletter)</p>	<p>transport companies providing goods delivery</p>
<p>Marketing communication with data subject without prior relationship</p>	<p>sales support, marketing offers, newsletter, product and news information</p>	<p>name, surname, title, permanent residence, email, phone</p>	<p>consent of the data subject</p>	<p>we will process your personal data for this purpose until you cancel your participation in the marketing list or unsubscribe from messages for direct marketing purposes (newsletter)</p>	<p>transport companies providing goods delivery</p>
<p>Camera system</p>	<p>protection of the Controller's property</p>	<p>natural persons moving in the monitored area</p>	<p>legitimate interest of the Controller</p>	<p>72 hours</p>	<p>members of the Police Force if necessary, the Controller's legal representative</p>
<p>Disclosure of video recordings to law-enforcement authorities</p>	<p>proving legal claims</p>	<p>natural persons moving in the monitored area</p>	<p>statutory obligation of the Controller</p>	<p>recordings may also be used to prove legal claims and the Controller will process them for the period necessary to prove them</p>	<p>state administration bodies, public authorities</p>

Responding to requests addressed to the Controller	receiving and handling requests sent via the message through the contact form on the website or via social networks	clients	fulfilment of pre-contractual relations	3 months from the date of receipt of the request or until the purpose is fulfilled, whichever occurs first	none
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TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES AND AUTOMATED INDIVIDUAL DECISION-MAKING

The transfer of personal data to a third country or to an international organisation does not take place. Personal data will not be used for automated individual decision-making including profiling.

DISCLOSURE of PERSONAL DATA

Publication of information materials on the Controller’s website.

UNSUBSCRIBING FROM SENDING NEWSLETTERS AND COMMERCIAL COMMUNICATIONS

We send you emails with inspiration, articles or product information and services if you are our customer, on the basis of our legitimate interest. If you are not yet a customer, we send you emails only on the basis of your consent. In both cases you can end your subscription to our emails by clicking the unsubscribe link in every email sent.

CONFIDENTIALITY

We would like to assure you that our employees and associates who will process your personal data are obliged to maintain confidentiality about personal data. This confidentiality continues even after our contractual relationships have ended.

SECURITY OF PERSONAL DATA

In accordance with Articles 24 and 32 GDPR, we take appropriate technical and organisational measures to ensure a level of personal-data security appropriate to the risk, taking into account the latest knowledge, costs of implementation, nature, scope, context and purposes of processing, as well as risks of varying probability and severity for the rights and freedoms of natural persons. Such measures include, in particular, protecting the confidentiality, integrity and availability of data through control of physical access to personal data as well as access to them, their input, disclosure, ensuring availability and separation. We have also implemented procedures to ensure

the exercise of data-subject rights, deletion of personal data and response to personal-data breaches. In addition, we take personal-data protection into account already during the development and selection of hardware, software and processes in accordance with the principle of data protection by design and by default (Art. 25 GDPR).

“COOKIES” ON OUR WEBSITE

We are entitled to collect and otherwise process data on visitors and users of our website through tools used for automated data collection, in particular cookies, logs and other commonly used tools for obtaining information through a website.

A cookie can be imagined as a small amount of data that is sent to your computer (tablet, smartphone) as a file from the website you are visiting. The file is stored on the computer and upon each subsequent visit to the same website the computer sends information to our server. Most websites, including ours, use cookies. The purpose of cookies is to make using our website easier and more pleasant for you. A cookie allows the website to recognise whether you have visited it before and which section you were interested in. At the same time, it is thanks to cookies that you can save your user settings such as language recognition or remembering your username. Through cookies we store data that we do not associate with your person, and through the obtained data we do not identify the customer. The use of cookies is not dangerous for you; cookies cannot transmit viruses or read data from the device’s hard disk.

This procedure follows from § 109(8) of Act No. 452/2021 Coll. on Electronic Communications. The use of cookies and their permission in a web browser is at the free will of every website user. You can freely delete cookies or pre-set your internet browser so that it either refuses to accept cookies or warns you when the server attempts to send you a cookie. Then it may happen that websites dependent on the support of cookies will not function as you would expect or that parts of the sites will not be available to you. We use persistent cookies, which help us identify your device when you return to the website and thus allow us to provide services in accordance with your expectations.

How can you change cookie settings?

You can accept or refuse cookies – including those used to track websites – by selecting the appropriate settings for your browser. You can set the browser to notify you when you receive a new cookie, or to block them completely. More information on how to manage cookie policy with the most used browsers can be found at:

- Google Chrome

<https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=en>

- Mozilla Firefox

<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

- Microsoft Internet Explorer

<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>

- Opera

<https://help.opera.com/cs/latest/>

- Apple Safari

<https://support.apple.com/en-gb/safari>

- Microsoft Edge

<https://support.microsoft.com/sk-sk/help/4468242/microsoft-edge-browsing-data-and-privacy-microsoft-privacy>

RIGHTS OF DATA SUBJECTS UNDER THE REGULATION AND THE PERSONAL DATA PROTECTION ACT

We consider it important that you understand that the personal data we process are your data and that their processing is associated with rights. In addition to the right to withdraw consent to the processing of personal data, you also have other rights arising from the Regulation and the Personal Data Protection Act, specifically:

Right of access – you have the right to obtain a copy of the personal data we hold about you as well as information on how we use your personal data. In most cases your personal data will be provided to you in written form unless you request otherwise. If you have requested this information electronically, it will be provided to you electronically where technically feasible.

Right to rectification – we take reasonable measures to ensure that the information we hold about you is accurate, complete and up-to-date. If you believe that the data we possess are inaccurate, incomplete or out of date, please do not hesitate to ask us to correct, update or complete this information.

Right to erasure – under certain circumstances you have the right to ask us to erase your personal data, for example if the personal data we obtained about you are no longer necessary to fulfil the original purpose of processing or if you withdraw your consent to processing. However, your right must be assessed in light of all relevant circumstances. For example, we may have certain legal and regulatory obligations which mean that we may not be able to comply with your request.

Right to restriction of processing – under certain circumstances you are entitled to ask us to stop using your personal data. This concerns, for example, cases where you believe that the personal data we hold may be inaccurate or where you believe that we no longer need to use your personal data.

Right to data portability – under certain circumstances you have the right to ask us to transfer personal data you have provided to us to another third party of your choice. However, the right to portability applies only to personal data that we obtained from you on the basis of consent or on the basis of a contract to which you are a party.

Right to object – you have the right to object to processing based on our legitimate interests (for example, personal data processed for the purpose of network and infrastructure security). If we do not have a compelling legitimate reason for processing and you object, we will no longer process your personal data.

Rights related to automated decision-making – you have the right to refuse automated decision-making, including profiling, that has legal or similarly significant effects on you. The Controller does not usually use automated decision-making or profiling in the employment context.

Right to withdraw consent – in most cases we do not process your personal data on the basis of your consent. However, in specific cases we may ask for your consent. In such cases you have the right to withdraw your consent to further use of your personal data (e.g. photograph).

Right to lodge a complaint – if you wish to complain about the way your personal data are processed, including exercising the above rights, you can contact our Data Protection Officer (contact details are given above). We will duly investigate all your suggestions and complaints. If you are not satisfied with our response or believe that we process your personal data unfairly or unlawfully, you can lodge 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; email: statny.dozor@pdp.gov.sk. However, we will be glad if you address your objections with us first.

HOW TO EXERCISE YOUR RIGHTS

You always exercise your rights with the entity that processes your personal data, i.e. with the specific Controller. If the Controller has a data protection officer, you can also address your request to this person. The request may be oral, written, electronic or submitted by other means (the General Data Protection Regulation does not prescribe a specific form). We recommend using in particular written or electronic form.

Prepare identification data on the basis of which the Controller will be able to identify you in its environment and thus provide you with the data concerning you. We will respond to your request free of charge within 30 days. In case of complexity or a large number of requests we are entitled to extend this period by a further 60 days. Should this occur, we will inform you thereof and of the reasons. In the case of a repeated request we are entitled to charge a reasonable administrative fee to cover the costs associated with providing this service.

The right of the data subject to object to automated decision-making cannot be exercised because the described processing does not involve automated decision-making.

WHERE AND HOW YOU CAN EXERCISE YOUR RIGHTS

The Controller has not appointed a data protection officer, as this is not a statutory necessity. If you have any questions regarding the processing of your personal data, or if you are interested in more detailed information, you can contact us by email or in writing at our address.

CONCLUSION

If you have questions regarding personal-data protection, you can contact us at any time by email or by post at the Controller's registered office. If you exercise any of the rights of the data subject under the legal regulations governing personal-data protection and your request does not allow us to verify the identity of the applicant or if we have reasonable doubts regarding the identity of the person submitting the request, we reserve the right to ask this person to provide additional information necessary to confirm the identity of the person exercising the request.