

For the purpose of respecting the principles of justice and transparency towards data subjects, as the information system controller, IT Impulse would like to disclose the Regulation on personal data protection titled

## **PERSONAL DATA PROTECTION PRINCIPLES**

according to the Article 13 and underlying recitals of Regulation (EU) and of the Council No 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the Regulation) and according to the Act No. 18/2018 Coll. on personal data protection and on amendments (hereinafter referred to as the Personal Data Protection Act)

In our information systems the purposes of the processing of personal data of data subjects (employees, clients) are based upon reasons precisely determined by legal grounds. The purposes are specifically defined, explicitly stated and legitimate; whereas when processing personal data of data subjects we adhere to the principle of lawfulness according to the Article 6 and 9 of the Regulation (individual purposes and legal grounds are stated in the Appendix of the Personal Data Protection Principles).

Data subjects, whose personal data are being processed in our information systems for specifically determined purposes, may, in a written form or electronically, exercise the following rights:

- a) Right to access personal data– it is a right to obtain a confirmation as to whether or not personal data related to the data subject are being processed, as well as a right to gain access to such data in full extent in terms of purpose and duration, categories of personal data being processed, scope of beneficiaries, of procedures used in every step of automated processing, resp. consequences of such processing. As the controller, we have a right to use all appropriate measures to verify the identity of the data subject that requests an access to data, particularly concerning online services and identifications (Article 15, Recital 63, 64 of the Regulation).
- b) Right to edit incorrect data and complement missing personal data (Article 16, Recital 65 of the Regulation).
- c) Right to delete– „to forget“ obsolete data not needed for the determined purposes that have been previously obtained and processed; when withdrawing from the consent based on which the processing is being carried out; in case of illegal processing; in case personal data were acquired in relation to information society offer (concerning children) under the conditions stated in the Article 17, Recital 65, 66 of the Regulation.
- d) Right to restrict processing could be exercised if, as the data subject, you challenge the correctness of personal data and respective details according to the Article 18, Recital 67 of the Regulation by temporarily transferring selected personal data to a different processing system, by restricting users to access selected personal data or by temporarily deleting processing.
- e) Right to transfer data - the right to transfer personal data you provided to our information system based on the consent or contract execution to a further controller in a structured,

commonly used and electronically readable format, when technically possible, under the conditions stated in the Article 20, Recital 68 of the Regulation provided the processing is not automated. The application of this right shall be without prejudice to the Article 17 of the Regulation. Right to data transfer shall not apply to processing necessary for the performance of task carried out in the public interest or in the exercise of an official authority vested in the controller.

- f) Without prejudice to any other administrative or judicial remedy, as the data subject, you shall have the right to lodge a complaint pursuant to the Article 77 of the Regulation to the Office for Personal Data Protection of the Slovak Republic, if in your view, the processing of your personal data is not in compliance with the Regulation or with the Personal Data protection Act.

On compelling legitimate grounds related to your particular situation, as the data subject, you have a right to object at any time to the data processing, also when processing is necessary for the purposes of the legitimate interests pursued by a controller or a third party (excluding processing implemented by public authorities in the performance of their public duties), except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, which require protection of personal data (in particular where the data subject is a child).

IT – Impulse Ltd., Letná 42, 040 01 Košice – Old Town, as the information system controller, adopted all adequate personal, organizational and technical measures to protect your personal data to the highest possible extent in order to decrease, as much as possible a risk of misuse, leakage, etc. In compliance with our duty, pursuant to the Article 34 of the Regulation, we would like to make a claim to you as to the data subject, that if, as the controller, we violate the protection of personal data in ways that could seriously endanger rights and freedoms of natural persons, we would notify you without undue delay.

NOTICE: Due to adhering to the principle of minimization, all personal data you provided are considered as necessary legal or contractual requirement as to fulfilling the processing purposes. Failing to provide compulsory data necessary for contract signing may result in termination of contractual relationship.

In case of any questions related to the protection of your personal data, including execution of your rights according to Regulation and Personal Data Protection Act, we would like to kindly request you to contact us

Contact information

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1 STAFF AND PAYROLL AGENDA	
Purpose of personal data processing	Meeting the obligations of an employer related to the employment relationship or similar relationship (i.e. based on contracts concerning works carried out outside of the employment relationship framework) including pre-contractual relationships.
Information system name	Staff and Payroll Agenda of Employees
Legal basis	<p>The Constitution of the Slovak Republic, the National Council of the Slovak Republic Act No 311/2001 Coll. Labour Code as amended, the National Council of the Slovak Republic Act No 552/2003 Coll. on execution of works in public interest as amended, the National Council of the Slovak Republic Act 312/2001 Coll. on public duty and on amendments, the National Council of the Slovak Republic Act No 553/2003 Coll. on remuneration of employees executing works in public interest and on amendments, the National Council of the Slovak Republic Act No 595/2003 Coll. on income tax as amended, the National Council of the Slovak Republic Act No 563/2009 Coll. on tax administration (tax ordinance) and on amendments, the National Council of the Slovak Republic Act No 461/2003 Coll. on social insurance as amended, the National Council of the Slovak Republic Act No 600/2003 Coll. on child benefit and amending and supplementing of the Act No 461/2003 Coll. on social insurance as amended, National Council of the Slovak Republic the Act No 462/2003 Coll. on compensation of earnings during temporary incapacity for work and on amending and supplementing certain acts as amended, the National Council of the Slovak Republic Act No 580/2004 Coll. on health insurance and on amending and supplementing certain acts as amended, the National Council of the Slovak Republic Act No 650/2004 Coll. on supplementary pension scheme as amended, the National Council of the Slovak Republic Act No 448/2008 Coll. on Social Services as amended, the National Council of the Slovak Republic Act No 5/2004 Coll. on employment services as amended, the National Council of the Slovak Republic Act No 82/2005 Coll. on illegal work and illegal employment as amended, the National Council of the Slovak Republic Act No 245/2008 Coll. on education and training (Education Act) and on amending and supplementing certain acts as amended, the National Council of the Slovak Republic Act No 18/2018 Coll. on personal data protection and on amending and supplementing certain acts as amended, the National Council of the Slovak Republic Act No 84/2014 Coll., the National Council of the Slovak Republic Act No 317/2009 Coll. on educators and professionals and on amending and supplementing certain acts, the National Council of the Slovak Republic Act No 152/1994 Coll. on social fund and on amending and supplementing of the National Council of the Slovak Republic Act No 286/1992 Coll. on income tax as amended, the National Council of the Slovak Republic Act No 43/2004 Coll. on retirement pension savings, the National Council of the Slovak Republic Act No 124/2006 Coll. on occupational safety and health and on amending and supplementing certain acts. Processing of personal data is allowed by the Act No 577/2004 Coll. on the health care scope covered by public health insurance and on reimbursement of healthcare related services as amended, by the Act No 578/2004 Coll. on health care providers, health care workers, professional organisations in the health service and on amending and supplementing certain laws as amended, Decree of the Ministry of Health No 448/2007 Coll. on detailed arrangements of work factors and work environment in relation to work categorization</p>

	regarding health risks and on proposal of formalities to work categories creation, the Act No 355/2007 Coll. on public health protection, support and development and on amending and supplementing certain laws as amended and corresponding regulations, the Act No 204/2014 Coll. amending and supplementing the Act No 355/2007 Coll. on public health protection, support and development and on amending and supplementing certain laws as amended, the Act No 124/2006 Coll. on occupational safety and health and on amending and supplementing certain acts as amended, the Act No 470/2011 Coll., amending and supplementing the Act No 124/2006 Coll. on occupational safety and health and on amending and supplementing certain acts as amended, amending and supplementing the Act No 355/2007 Coll. on public health protection, support and development and on amending and supplementing certain acts as amended, Decree of the Ministry of Health on details on the health service performance scope and content, on composition of the expert team that carries out the responsibilities and requirements on the team members' professional competence.
Types of beneficiaries	Processor for HR processing, processor for payroll agenda processing, processor – Occupational Safety and Health officer, public authorities under relevant legislation, health insurance companies, supplementary pension funds, supplementary management companies.
Transnational transfer of personal data	Not applicable
Time period for personal data deletion <i>(stated period is after the termination of employment relationship)</i>	– 5 -10 years, personal records – up to 70 years of an employee's age
Information related to existence of automated decision making including profiling	Not applicable
Types of data subjects	Job applicants, employees, husbands and wives of employees, dependent children of employees, dependent children parents of employees, related persons, former employees
<b>2 ECONOMY AND ACCOUNTING AGENDA</b>	
Purpose of personal data processing	The purpose for personal data processing is processing of orders, received invoices and billing of customers, bank contact, treasury management, expenditure and revenue processing, stock management, registration of capital goods (including automated amortisation) and small scale equipment as well as simple and double entry book-keeping.
Information system name	Economy - accounting
Legal basis	The Act No 431/2002 Coll. on accounting as amended, the Act No 222/2004 Coll. on income tax as amended, the Act No 18/2018 Coll. on personal data processing and on amending and supplementing certain acts, the Act No 145/1995 Coll. on administrative fees as amended, the Act No 40/1964 Coll. Civil Code as amended, the Act No 152/1994 Coll. on social fund and on amending and supplementing the Act No 286/1992 Coll. on income tax as amended, the Act No 311/2001 Coll. Labour Code as amended, the Act No 400/2009 Coll. on state service and amending and supplementing certain acts as amended, the Act No 513/1991 Coll. Commercial Code as amended, the Act No 583/2004 Coll. on financial regulations of local authorities and on amending and supplementing certain acts.

Types of beneficiaries	- public authorities compliant with regulations concerned - a processor
Transnational personal data transfer	Not applicable
Time period for deletion of personal data (stated periods are compliant with the registration policy)	- 10 years
Information related to existence of automated decision making including profiling	Not applicable
Types of people concerned	Natural persons – controller’s employees, suppliers and customers – natural persons, employees of suppliers and customers, representatives of suppliers and customers

### 3 REGISTER OF JOB APPLICANTS

Purpose of personal data processing	The purpose of personal data processing within the framework of this agenda is a management of database of job seekers that have submitted a job application to the IS system voluntarily, not as a response to a call for a new job opening
Information system name	IS Register of job applicants
Legal basis	Consent of a data subject according to the Article 6 (1a) of the Regulation and the Act on personal data protection, whereas the data subject has a right to revoke the consent at any time. The consent revocation shall not affect the lawfulness of processing based on consent before its revocation
Types of beneficiaries	There are none
Transnational personal data transfer	Not applicable
Time period for deletion of personal data	the period of 36 months of the date of submitting a job application
Information related to existence of automated decision making including profiling	Not applicable
Types of data subjects	Job applicants

### 4 PROMOTION OF THE CONTROLLER

Purpose of personal data processing	Disclosure of employees’ photographs with the aim to build a good reputation for the controller, to promote the controller on its website, within the administrative facilities, social networks or on the internet
Information system name	Promotion of the IS Controller
Legal basis	Consent of a data subject according to the Article 6 (1a) of the Regulation and the Act on personal data protection, whereas the data subject has a right to revoke the consent at any time. The consent revocation shall not affect the lawfulness of processing based on consent before its revocation
Types of beneficiaries	There are none
Transnational personal data transfer	Not applicable
Time period for deletion of personal data	2 years since disclosure
Information related to existence of automated decision making including profiling	Not applicable
Types of data subjects	Employees of the controller’s information system

**5 REGISTER OF SOLE TRADERS**

Purpose of personal data processing	The purpose of personal data processing within the framework of this agenda is preparation and management of customer-supplier relationship with sole traders. Under this agenda there are contractual relationships, invoices, orders, registration of deliveries and collection of goods, services, etc.
Information system name	Register of Sole Traders
Legal basis	Contract between the controller and a sole trader permitted by the Constitution of the Slovak Republic, the Civil Code, the Commercial Code, the Act No 455/1991 Coll., the Act on sole trade business (the Trade Licencing Act) and related legislation
Types of beneficiaries	Government bodies, public authorities in compliance with related legislation
Transnational persona data transfer	Not applicable
Time period for deletion of personal data	10 years after contractual relationship's termination due to entry into the accounts
Information related to existence of automated decision making including profiling	Not applicable
Types of data subjects	purchaser/supplier – sole trader

**6 REGISTER OF SUPPLIER/PURCHASER REPRESENTATIVES**

Purpose of personal data processing	The purpose of personal data processing within the framework of this agenda is management of a database of representatives, resp. employees of suppliers and purchasers in terms of fulfilment of their occupational, service-related and functional obligations and of ensuring smooth supplier-purchaser relationships.
Information system name	Register of supplier-purchaser representatives
Legal basis	The Article 78 (3) Act No 18/2018 Coll. on personal data protection and on amending and supplementing certain acts
Types of beneficiaries	There are none
Transnational persona data transfer	Not applicable
Time period for deletion of personal data	Within 30 of the date of termination of the supplier-purchaser relations
Information related to existence of automated decision making including profiling	Not applicable
Types of data subjects	Natural person - representative (employee) of the supplier, purchaser

**7 EXERCISING OF RIGHTS OF DATA SUBJECTS**

Purpose of personal data processing	The purpose of personal data processing within the framework of this agenda is to handle requests of natural persons related to exercising their rights as data subjects pursuant to the 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
Information system name	IS exercising of rights of data subjects
Legal basis	The Article 6 (1a), in accordance with the Article 15 till 22 and 34 of the 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
Types of beneficiaries	– Government bodies, public authorities in compliance with related legislation
Transnational persona data transfer	Not applicable

Time period for deletion of personal data	1 year of the request settlement date
Information related to existence of automated decision making including profiling	Not applicable
Types of data subjects	Natural person, who as the data subject, turns to the controller with a request to exercise his/her rights within clear purpose limitation set by the controller.
<b>8 LEGAL RELATIONS</b>	
Purpose of personal data processing	The purpose of personal data processing within the framework of this agenda is to manage legal agenda (i.e. first instance, provision of legal remedies, resolution of disputes, representation in legal affairs, application of decisions related to compensation of damage, compensation of damage recovery, application of obligations arising under the contracts, proposing measures with organizational/legal impact etc.)
Information system name	IS Legal relations
Legal basis	Legal basis for processing personal data is the Act No 460/1992 Coll. of the Slovak Republic Constitution as amended, the Act No 40/1964 Coll. of the Civil Code as amended, the Act No 99/1963 Coll. Civil Procedure Code, The National Council of the Slovak Republic Act No. 300/2005 Coll. Criminal Code, The National Council of the Slovak Republic Act No. 301/2005 Coll. Criminal Code, the National Council of the Slovak Republic Act No 71/1967 the Administration Procedure Code, the Act No 233/1995 Coll. on bailiffs and on enforcement procedures (Enforcement Order) and amending and supplementing certain acts as amended, the National Council of the Slovak Republic Act No 7/2005 Coll. on bankruptcy and restructuring and on amending and supplementing certain acts as amended, the National Council of the Slovak Republic Act No 153/2001 Coll. on prosecution as amended, the National Council of the Slovak Republic Act No 372/1990 Coll. on offences as amended, the Act No 586/2003 Coll. on advocacy and on amending and supplementing certain acts as amended, the Act No 455/1991 Coll. on the Act on sole trade business (the Trade Licencing Act) and related legislation as amended, the Act on personal data protection and related legislation as amended
Types of beneficiaries	<ul style="list-style-type: none"> <li>- processor</li> <li>- judicial authorities</li> <li>- bailiff offices</li> <li>- government entities, public authorities and public administration under corresponding legislation</li> </ul>
Transnational persona data transfer	Not applicable
Time period for deletion of personal data	10 years
Information related to existence of automated decision making including profiling	Not applicable
Types of data subjects	<ul style="list-style-type: none"> <li>- controller IS employees,</li> <li>- debtors,</li> <li>- counterparties in disputes,</li> <li>- other natural persons as parties in a proceeding</li> </ul>

## 9 CLIENTS OF CONTRACTUAL PARTNERS

Purpose of personal data processing	The main purpose of the information system concerned is the performance of the contract closed between the controller and the contractual partner. When performing the contract, there is a so-called trial period for the subject-matter of the contract (in most cases it is a software designed by the controller), the period within which the controller technically ensures the functioning of the subject-matter of the contract, its inspection and testing, supervises the functioning of the subject-matter of the contract and provides technical consultancy, if needed. In some cases there is no trial period, the services are being provided on a continuous basis, during the entire duration of the contractual relationship. The personal data processing may occur in an instance, when the controller has access to data logged in by the contractual partner to the software, designed by the controller already being used by the contractual partner. Such IS shall be activated provided the contractual party of the controller requests such services and abovementioned contractual relationship shall be established.
Information system name	IS Clients of contractual partners
Legal basis	Legal basis for personal data processing in indicated information system is contractual relationship between IS controller and contractual partner (the Customer) precisely and in detail specified to suit the conditions of the implemented project.
Types of beneficiaries	<ul style="list-style-type: none"> <li>- the range of third parties and beneficiaries to which personal data shall be provided to or to which access to data shall be granted, shall form a part of the contractual relationship between the controller and the contractual partner, stating the legal basis upon which provision or access is granted.</li> <li>- The contract must also include definition of the obligation of the contractual partner to provide information to the data subjects on third parties and beneficiaries laid down in the contract.</li> </ul>
Transnational persona data transfer	Not applicable
Time period for deletion of personal data	
Information related to existence of automated decision making including profiling	Not applicable
Types of data subjects	Employees of the contractual partner and clients of the contractual partners (if their personal data are logged in the software designed by the controller)