NOTICE ON THE PROCESSING OF PERSONAL DATA
PERSONS OUTSIDE THE COMPANY

1. IDENTIFICATION OF THE CONTROLLER AND GENERAL INFORMATION

This notice on the processing of personal data (hereinafter the "***Notice***") contains information on the processing of your personal data by the business company **ADASTRA, s. r. o.**, with its registered office at Mýtna 48, 811 07 Bratislava, Business ID: 35 874 244, registered in the Commercial Register of the City Court Bratislava III, Section: Sro, Insert No. 30530/B (hereinafter the "***Controller***" or "***we***" in the corresponding grammatical form), which takes place in the course of the Controller's business activities in relation to its business partners, customers or other persons who contact the Controller.

Through this Notice, the Controller provides you with information on why your personal data is processed, how it is processed, how long the Controller retains it, what your rights are in connection with the processing of your personal data, and other relevant information on the processing of your personal data in the cases referred to above. Through this Notice, the Controller also fulfils its information obligation towards all data subjects, both where the Controller obtained the personal data directly from you as the data subject and where it obtained your personal data from another source.

The Controller processes your personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of the European Union 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 Data Protection Regulation) (hereinafter the "**Regulation**") and other data protection legislation (the *Regulation* and other data protection legislation together also the "***Data Protection Legislation***").

You can contact the Controller on matters concerning the processing and protection of personal data at **ADASTRA, s. r. o.**, with its registered office at Mýtna 48, 811 07 Bratislava, or by e-mail at **GDPRSK@adastragrp.com**. You may contact the Controller at the above contact details with any questions concerning the processing of your personal data.

2. INFORMATION ON PROCESSING OPERATIONS – LEGAL BASES, PURPOSES OF PROCESSING AND RETENTION PERIODS OF PERSONAL DATA

The Controller processes your personal data only for justified purposes, for a limited period and with the maximum possible degree of security. We process your personal data in accordance with the principle of lawfulness, i.e. only where an adequate legal basis for the processing exists under Article 6(1) of the Regulation, **specifically on the basis of the following legal bases**:

IN CONNECTION WITH THE CONTROLLER'S ACTIVITIES:

Purpose of processing	**performance of contractual obligations (on the basis of contracts with customers, suppliers of goods and services, on the basis of service agreements with internal suppliers (contractors/subcontractors) and other business partners) and implementation of pre-contractual relations**
Legal basis	Article 6(1)(b) of the Regulation – the processing of personal data is carried out for the performance of a contract (implementation of pre-contractual relations)
Categories of personal data	common personal data: first name, surname, business name, address of residence / place of business, Business ID, date of birth, contact details (tel. no., e-mail), bank account details
Retention period	for the duration of the contractual relationship and after its termination until full settlement of contractual and other claims arising from the contractual relationship, or until the expiry of the limitation periods set out in the relevant legislation

Purpose of processing	**records of internal suppliers (contractors/subcontractors), suppliers, customers and other business partners (their contact persons / representatives where they are legal entities) in contractual relationships, of concluded contracts, and conduct of appropriate business communication**
Legal basis	Article 6(1)(f) of the Regulation – *the processing of personal data is carried out on the basis of the Controller's legitimate interest, which is the interest in the proper performance of contractual obligations, in keeping records of business partners / contact persons of business partners that are legal*

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	entities for the purposes of bookkeeping, ensuring internal control activities and enforcing legal and other claims arising from concluded contracts
Categories of personal data	common personal data (first name, surname, business name, address of residence / place of business, Business ID or other unique identification data, contact details – tel. no., e-mail address, bank account details, affiliation to the business partner's company), data on the contractual relationship – scope of services provided, project specialisation, list of foreign languages spoken, work experience, education and professional experience and the like
Retention period	for the duration of the contractual relationship and after its termination until full settlement of contractual and other claims arising from the contractual relationship (usually until the expiry of limitation periods) or until the natural person ceases to be a representative of the legal entity; at the latest until full settlement of legal and other claims arising from the contractual relationship
Purpose of processing	**verification of the employment conditions of suppliers of services and work in order to assess whether the supplier of services and work is not in breach of the prohibition of illegal employment**
Legal basis	Article 6(1)(c) of the Regulation, Act No. 82/2005 Coll. on Illegal Work and Illegal Employment and on Amendments to Certain Acts, as amended – the processing of personal data is carried out for compliance with legal obligations
Categories of personal data	personal data necessary to enable the Controller to check whether the supplier of services or work is not in breach of the prohibition of illegal employment under Section 7b(6) of Act No. 82/2005 Coll. on Illegal Work and Illegal Employment and on Amendments to Certain Acts, as amended
Retention period	5 years following the year to which they relate
Purpose of processing	**handling of complaints**
Legal basis	Article 6(1)(c) of the Regulation, Act No. 513/1991 Coll. Commercial Code, as amended, Act No. 40/1694 Coll. Civil Code, as amended – the processing of personal data is carried out for compliance with legal obligations
Categories of personal data	common personal data necessary for compliance with legal obligations
Retention period	4 years following the day the complaint was lodged; in the case of natural persons who are not entrepreneurs, 3 years following the day the complaint was lodged; or, in both cases, until full settlement of the claims arising from the lodged complaints, or until the expiry of the limitation periods set out in the relevant legislation
Purpose of processing	**processing of accounting documents**
Legal basis	Article 6(1)(c) of the Regulation – the processing of personal data is carried out for compliance with legal obligations
Categories of personal data	common personal data necessary for compliance with legal obligations (first name, surname, address of residence / place of business, address of service delivery, contact details – tel. no., e-mail address, bank account details)
Retention period	10 years following the year to which they relate
Purpose of processing	**management of the registry, recording and handling of incoming and outgoing mail (including electronic communication with the relevant institutions)**
Legal basis	Article 6(1)(c) of the Regulation – the processing of personal data is carried out for compliance with legal obligations
Categories of personal data	common personal data
Retention period	Mail – 5 years following the year to which it relates; other records forming part of the registry in accordance with the relevant provisions of Act No. 395/2002 Coll. on Archives and Registries and on Amendments to Certain

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	Acts, as amended
Purpose of processing	**transfer of personal data for administrative purposes within a group of undertakings**
Legal basis	Article 6(1)(f) of the Regulation – *processing of personal data on the basis of the Controller's legitimate interest, which consists in the need to ensure the necessary transfer of information – including personal data – within the group of undertakings of which the Controller is a member for administrative purposes, whereby the transfer is carried out in particular for the following purposes: improving the provision of services to the Controller's clients, performance of control and internal audit, the Controller's business activities, processing of the Controller's accounting, and information security and information technology services*
Categories of personal data	common personal data
Retention period	for the duration of the employment relationship or similar employment-type relationship of the data subject with the Controller, or for the duration of the data subject's membership in the Controller's statutory body, or the data subject's position in a specific function in the management of the Controller's company, or for the duration of the contractual relationship, not more than 3 years after the termination of the employment relationship or contractual relationship.
Purpose of processing	**examination of reports by whistleblowers of anti-social activity**
Legal basis	Article 6(1)(c) of the Regulation, Act No. 54/2019 Coll. on the Protection of Whistleblowers of Anti-Social Activity and on Amendments to Certain Acts – the processing of personal data is carried out for compliance with legal obligations
Categories of personal data	common personal data necessary for compliance with legal obligations
Retention period	120 days from the date of receipt of the report
Purpose of processing	**records of reports by whistleblowers of anti-social activity**
Legal basis	Article 6(1)(c) of the Regulation, Act No. 54/2019 Coll. on the Protection of Whistleblowers of Anti-Social Activity and on Amendments to Certain Acts – the processing of personal data is carried out for compliance with legal obligations
Categories of personal data	common personal data necessary for compliance with legal obligations
Retention period	3 years from the date of termination of the whistleblower's protection under Section 8 of Act No. 54/2019 Coll. on the Protection of Whistleblowers of Anti-Social Activity and on Amendments to Certain Acts
Purpose of processing	**conduct of judicial and administrative proceedings**
Legal basis	Article 6(1)(c) of the Regulation – the processing of personal data is carried out for compliance with legal obligations
Categories of personal data	common personal data necessary for compliance with legal obligations
Retention period	For the duration of the relevant proceedings and until the expiry of limitation periods (unless the relevant legislation provides otherwise)
Purpose of processing	**handling of data subjects' exercised rights**
Legal basis	Article 6(1)(c) of the Regulation – the processing of personal data is carried out for compliance with legal obligations
Categories of personal data	common personal data that form part of the request
Retention period	until the exercised rights have been handled

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Purpose of processing	**records of data subjects' exercised rights and of the manner in which the exercised rights were handled**
Legal basis	Article 6(1)(f) of the Regulation – *processing of personal data on the basis of the Controller's legitimate interest, which is the need to keep records of data subjects' exercised rights in order to demonstrate compliance with obligations arising from the relevant legislation in the field of personal data protection*
Categories of personal data	common personal data that form part of the request
Retention period	5 years from the date the exercised right or request was handled

IN CONNECTION WITH SECURITY MEASURES AT THE CONTROLLER:

Purpose of processing	**records of visitors (third parties) entering the Controller's premises**
Legal basis	Article 6(1)(f) of the Regulation – the processing of personal data is carried the basis of the Controller's legitimate interest, which consists in the Cont need to ensure: sufficiently effective protection of the Controller's property the health of its staff, a preventive means of avoiding possible unlawful c that may occur in the monitored premises, and a means of clarifying such c should it occur.
Categories of personal data	common personal data: first name, surname and place of residence
Retention period	1 year from the day following the visit

IN CONNECTION WITH THE PRESENTATION OF THE CONTROLLER'S ACTIVITIES:

Purpose of processing	**making and publishing photographs and audiovisual recordings of data subjects on the Controller's website, social networks and other promotional materials in the course of the Controller's presentation activities**
Legal basis	Art. 6(1)(a) – the processing of personal data is carried out on the basis of the data subject's consent
Categories of personal data	common personal data: title, first name, surname, photograph, expressions of a personal nature
Retention period	5 years from the date consent is granted or until it is withdrawn, whichever occurs first
Purpose of processing	**responding to messages and handling inquiries / requests from messages delivered to the Controller, including through the contact form on the website, a social network message, e-mail communication or by telephone**
Legal basis	Art. 6(1)(f) of the Regulation – *the processing of personal data is carried out on the basis of the Controller's legitimate interest, which is responding to received messages for the proper conduct of business communication, improving the quality of the services provided and acquiring new clients*
Categories of personal data	Common personal data – first name, surname, e-mail, tel. no., other data provided in the message
Retention period	60 days from the date of receipt of the request or until it is handled (the purpose is fulfilled), whichever occurs first
Purpose of processing	**sending information about the Controller's activities and its own services (direct marketing to existing and former customers)**
Legal basis	Art. 6(1)(f) of the Regulation – *the processing of personal data is carried out on the basis of the Controller's legitimate interest, which is the interest in retaining the existing client base and informing it about the Controller's current services*
Categories of personal data	first name, surname, position in the client's company, postal delivery address, e-mail address
Retention period	in accordance with the relevant provisions of Act No. 452/2021 Coll. on Electronic Communications (1 year from the end of the contractual relationship)

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IN CONNECTION WITH THE OPERATION OF THE WEBSITE:

The Controller cooperates closely with companies from the group of undertakings of which the Controller is a member, and together with selected companies, as part of business activities, they jointly operate the website www.adastracorp.com as joint controllers. The joint controllers process your personal data only for the purposes stated in the table below. More information on the processing of personal data by the joint controllers can be found at www.adastracorp.com/privacy-policy.

Purpose of processing	**subscription to the marketing newsletter**
Legal basis	Art. 6(1)(a) – the processing of personal data is carried out on the basis of the data subject's consent
Categories of personal data	e-mail address
Retention period	3 years from the date consent is granted or until it is withdrawn, whichever occurs first
Purpose of processing	**responding to messages and handling inquiries / requests from messages delivered to the Controller through the contact form on the website**
Legal basis	Art. 6(1)(f) of the Regulation – *the processing of personal data is carried out on the basis of the Controller's legitimate interest, which is responding to received messages for the proper conduct of business communication, improving the quality of the services provided and acquiring new clients*
Categories of personal data	Common personal data – first name, surname, e-mail, tel. no., other data provided in the message
Retention period	60 days from the date of receipt of the request or until it is handled (the purpose is fulfilled), whichever occurs first
Purpose of processing	**processing of strictly necessary functional cookies**
Legal basis	Article 6(1)(f) of the Regulation – *the processing of personal data is carried out on the basis of a legitimate interest, which is ensuring the functionality of the website*
Categories of personal data	IP address of the device used, data on the web browser used
Retention period	3 months from the visit to the website
Purpose of processing	**measuring website traffic, activity on the website and targeting the Controller's online advertising (through online tools – cookies)**
Legal basis	Art. 6(1)(a) – the processing of personal data is carried out on the basis of the data subject's consent
Categories of personal data	data on activity on the Controller's website and on preferences in the online environment, IP address of the device used, data on the web browser used, other online characteristics and preferences depending on the scope of the consent granted
Retention period	at most 2 years from the date consent is granted (depending on the settings of the individual COOKIE files) or until it is withdrawn, whichever occurs first

The Controller processes only those personal data that are necessary for the processing operation (purpose of processing), **always in accordance with the data minimisation principle**, so that we fulfil contractual and legal requirements or process only those personal data for the processing of which we have a legitimate interest, always only to the extent necessary to fulfil the specified purpose of processing. This means that we do not require from you personal data that are not necessary for the specific purpose of processing.

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The Controller always retains personal data in accordance with the storage limitation principle. This means that it processes personal data only for as long as it is necessary to retain them. After this period expires, the Controller deletes the personal data, unless legislation provides otherwise. The Controller has determined the retention period of your personal data in accordance with the relevant legislation, as set out above in the table of purposes.

3. **SOURCE OF PERSONAL DATA**

The Controller obtains your personal data directly from you as the data subject, where you provide it yourself (when sending a message to the e-mail address stated on the website, when visiting the Controller's website or when concluding a contractual relationship with the Controller).

In some cases, in particular where a service is ordered from the Controller by a business company or other entity of which you are a representative or contact person, the source of your personal data is that entity.

If in some cases you did not provide your personal data to the Controller, the Controller would not be able to deliver goods to you, conclude a contract with you and fulfil its other legal and contractual obligations.

4. **RECIPIENTS OF YOUR PERSONAL DATA**

Your personal data may be provided to recipients, in particular public authorities that are entitled to process your personal data as independent controllers and as third parties – in particular the tax administrator, the Office for Personal Data Protection, courts, law enforcement authorities, the labour inspectorate when verifying illegal employment, and the Ministry of Justice of the Slovak Republic when reporting anti-social activity.

In some cases, the Controller also provides your personal data to its processors, which include:

1. **companies of the Adastra Group of undertakings that operate group information systems (SAP, Axapta) for the Controller,**
2. **processors providing IT and IS services, in particular the provider of office and communication services Microsoft 365, including e-mail and storage (Microsoft Ireland Operations Ltd.),**

The Controller has concluded data processing agreements with its processors and maintains a list of its processors. Other recipients of your personal data include law firms, enforcement officers, notaries and auditors (as independent controllers bound by professional confidentiality), an entity providing tax advisory and audit services (PwC Slovensko), experts and entities providing expert assessments when handling complaints, the Controller's banks, and the Controller's customers and potential customers to whom an offer is submitted, if you are a contact person or representative of the Controller's supplier.

The Controller transfers data subjects' personal data within the group of undertakings of which the Controller is a member on the basis of its legitimate interest and a conducted proportionality test, in direct connection with and on the basis of Recital 48 of the Regulation, which provides: "*Controllers that are part of a group of undertakings or institution affiliated to a central body may have a legitimate interest in transmitting personal data within the group of undertakings for internal administrative purposes, including the processing of clients' or employees' personal data.*"

Recipients of your personal data also include **Google Ireland Limited**, which provides analytics and marketing services through cookies that are stored on your device by the Controller's website. Recipients of your personal data may also include operators of the social networks Facebook and Instagram (Meta Platforms Ireland Ltd.) and LinkedIn (LinkedIn Ireland Unlimited Company), if you grant the Controller consent to publish your photograph on the Controller's profile on those social networks.

3. **TRANSFERS, PROFILING AND AUTOMATED DECISION-MAKING**

In the cases referred to above, the Controller does not process your personal data by means of profiling or any form of automated individual decision-making involving an evaluation of your personal aspects.

The processing of your personal data does not involve their transfer to third countries or international organisations.

If you grant consent to the processing of analytical and marketing cookies on the Controller's website, your personal data may be transferred to the USA (e.g. to Meta Platforms, Inc.). Such a transfer is always secured by adequate safeguards for the transfer of personal data to third countries in accordance with the Data Protection Legislation, in particular through the use of standard contractual clauses that form part of the terms of use of the above services, the adopted European Commission adequacy decision in respect of the USA as a third country within the meaning of the relevant articles of the Regulation, and also through additional transfer safeguards adopted by the providers of those services. A transfer may take place only exceptionally, on the basis of the relevant legislation in force in that third country (USA) that applies to those service providers **(FISA).**

4. **WHAT ARE YOUR RIGHTS IN CONNECTION WITH THE PROCESSING OF PERSONAL DATA?**

The protection of your personal data as a Data Subject is governed by the provisions of the Regulation, and as a Data Subject you may exercise your rights vis-à-vis the Controller by submitting a request. These rights are:

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Right of access – As a data subject, you have the right to obtain from the Controller confirmation as to whether it processes your personal data and, if so, you have the right to access that personal data and the information under Article 15 of the Regulation. The Controller will provide you with a copy of the personal data undergoing processing. If you submit the request by electronic means, the Controller will provide the information in a commonly used electronic form, unless you request otherwise.

Right to erasure (right "to be forgotten") – You also have the right to obtain from the Controller the erasure of your personal data without undue delay where certain conditions are met, for example where the personal data are no longer necessary for the purposes for which the Controller collected or processed them. However, this right of yours must be assessed individually, as a situation may arise in which other circumstances prevent the Controller from erasing the personal data (for example, a legal obligation of the Controller). This means that in such a case the Controller will not be able to comply with your request for erasure of personal data.

Right to data portability – In certain circumstances, you have the right to have personal data transmitted to another controller that you designate. However, the right to portability applies only to personal data that the Controller processes on the basis of consent that you have given to the Controller, on the basis of a contract to which you are a party, or where the Controller processes personal data by automated means.

Right to rectification – To ensure the accuracy, completeness and up-to-date nature of your personal data, the Controller has taken appropriate measures. As a data subject, you have the right to have the Controller rectify your inaccurate personal data or complete your incomplete personal data without undue delay.

Right to restriction of processing – You also have the right to have the Controller restrict the processing of your personal data. This will be the case, for example, if you contest the accuracy of the personal data or if the processing is unlawful and you request restriction of processing, or if the Controller no longer needs your personal data for the purposes of processing but you need them for the establishment, exercise or defence of legal claims. The Controller will restrict the processing of your personal data if you so request.

Right to lodge a complaint or petition – If you feel that your personal data are being processed in breach of applicable legislation, you may lodge a complaint with the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic, with its registered office at Galvaniho Business Centrum II, Galvaniho 7/B, Bratislava; website: dataprotection.gov.sk, tel. no.: 02 3231 3214; e-mail: statny.dozor@pdp.gov.sk.

RIGHT TO OBJECT – You have the right to object to the processing of personal data, for example where the Controller processes your personal data on the basis of legitimate interest or in processing that involves profiling. If you object to such processing of personal data, the Controller will not process your personal data further unless it demonstrates compelling legitimate grounds for further processing of your personal data.

RIGHT TO WITHDRAW CONSENT – Where the Controller processes your personal data on the basis of your consent, you have the right to withdraw the consent given at any time, in the same form in which you gave it. Withdrawal of consent does not affect the lawfulness of processing carried out before its withdrawal.

Your rights specified in the table above may be exercised at the Controller's contact details stated at the beginning of this document. The Controller will provide a response to the exercise of your rights free of charge. In the case of a repeated, unfounded or excessive request to exercise your rights, the Controller is entitled to charge a reasonable fee for providing the information. The Controller will provide you with a response **within 1 month** from the day on which you exercised your rights. In certain cases the Controller is entitled to extend this period, in the case of a large number and complexity of data subjects' requests, by a maximum of 2 months. The Controller will always inform you of the extension of the period.

5. VALIDITY

This updated Notice is valid and effective from 01.10.2026. Since the information on the processing of personal data contained in this Notice may need to be updated in the future, the Controller is entitled to update this Notice at any time. In such a case, however, the Controller will inform you of this in an appropriate manner in advance.

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