

### Information Obligation to Data Subjects for the Processing of Personal Data

pursuant to 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 (hereinafter referred to as "GDPR")

**The protection of the personal data of all data subjects, in relation to whom our company is in the position of a controller within the meaning of the GDPR terminology, is very important to us, therefore we approach the processing of this sensitive information responsibly and in accordance with the applicable legislation of the Slovak Republic as well as the European Union, in order to take all appropriate measures to prevent the violation of the rights in the area of personal data protection of data subjects.**

**This document fulfils the rights of the data subject to information granted by generally binding regulations and provided in this form.**

**Please read this document carefully, which is in fulfilment of the principle of transparency and compliance with the information on the procedures for the processing of personal data within the meaning of Article 12 of the GDPR.**

The company ZJ Antennas, s.r.o., Štefánikova 61, 085 01 Bardejov, ID No.: 51 865 700, registered in the Commercial Register of the District Court of Prešov, Section Sro, File No. 36731/P (hereinafter referred to as the "controller") processes personal data of the data subjects in accordance with the principles of lawfulness, fairness and transparency only for a limited purpose. In processing, it observes the principles of data minimisation, data accuracy and data retention minimisation. Ensures confidentiality and integrity in the processing of personal data and can responsibly demonstrate the compliance of processing operations with these principles.

The controller shall, having regard to the nature, scope, context and purposes of the processing of personal data, process personal data in such a way that the processing is unlikely to result in a high risk to the rights and freedoms of natural persons.

#### Collection of personal data:

The controller shall, as a rule, obtain personal data directly from the data subjects. If the controller does not obtain personal data from the data subject, the controller shall provide the data subject with all relevant information, subject to the exceptions provided for by law, in accordance with the procedures laid down by law.

The data subject is obliged to provide true and up-to-date personal data and, in the event of any change to the personal data provided, to notify the controller of such change.

#### Contact details of the controller:

ZJ Antennas, s.r.o.  
Postal address for delivery: 61 Štefánikova Street, 085 01 Bardejov  
E-mail address: hr@zj-antennas.com

#### The purposes for which the personal data are processed and the legal basis for the processing:

**Handling of enquiries from the data subject in relation to the products of the controller (potential customers) or in relation to the products of the entity for which the data subject acts (potential suppliers)** - by filling in the contact form, the data subject expresses an interest in information about the products of the controller, or the products themselves, or intends to generate interest in the products of the entity for which he/she is acting, therefore the personal data is used to meet his/her requests for the provision/acceptance of information and communication regarding the products of the controller or regarding the products of the entity for which the data subject is acting, in order to meet the data subject's query.

**The legal basis** for processing for this purpose is the pre-contractual relationship based on the request of the data subject relating to the products of the controller or to the products of the entity for which the data subject acts.

**Purpose of the provision of activities leading to the conclusion of a contract** - on the basis of the request and interest of the data subject in the products of the controller or on the basis of the interest of the controller in the products of the entity for which the data subject acts, the controller shall carry out the activities necessary for the conclusion of a contract with a potential customer or a potential supplier, in particular contacting him or her or arranging a personal meeting.

**The legal basis** for processing for this purpose is the pre-contractual relationship based on the request of the data subject relating to the products of the controller or to the products of the entity for which the data subject acts.

**Purpose of the proper conclusion and performance of the contractual relationship**  
**The legal basis** is the processing necessary for the performance of the contract.

**Purpose of the implementation of the existing contractual relationship, including the customer's or supplier's records** - necessary for the proper delivery of the product and the fulfilment of mutual related obligations and communications.

**The legal basis** is the processing necessary for the performance of the contract.

**The purpose of maintaining the accounting and tax agenda, managing the registry and fulfilling obligations under procedural legislation and debt recovery.**

**The legal basis** is the tax and accounting legislation, in particular Act No. 431/2002 Coll. on Accounting, Act No. 222/2004 Coll. on Value Added Tax, Act No. 595/2003 Coll. on Income Tax, regulations in the area of registry duties, in particular Act No. 395/2002 Coll. on archives

and registers, and legal regulations in the field of regulation of individual processes within which the controller is obliged to designate the relevant entity, in particular the Civil Procedure Code, etc.

**Purpose of sending information about our products** - if the data subject has expressed an interest in the products of the controller or in the cooperation of the entity for which he/she acts with the controller by filling in the form, he/she has the possibility to specifically consent to the processing of his/her personal data for the purpose of sending the controller's information leaflet, the so-called "newsletter", in which it is possible to learn more about the latest news, promotions and events regarding the controller's products. Consent to the processing of personal data for this purpose is expressed by the data subject by ticking the appropriate box in the entry form marked "I want to receive newsletter". The indication of interest in receiving the newsletter is considered as a specific consent to the processing of personal data for this purpose. Expression of consent - the indication of interest in receiving the newsletter is freely given by the data subject and is not conditional on the possibility to fill in or submit the form.

**The legal basis is the freely given consent of the data subject.**

#### Legitimate interests of the controller or of a third party

Where the controller processes the personal data of data subjects because it is necessary for the purposes of the legitimate interests pursued by the controller or a third party, the data subjects shall always be specifically informed of this legal basis for the legitimate interest as well as the legitimate interest in question and the controller shall, by means of a proportionality test identifying the legitimate interest, carry out a necessity test and a balancing test and ensure compliance with the requirement that the fundamental rights and freedoms of the data subject do not outweigh the legitimate interests of the controller or of the third party and that the lawfulness of the processing is complied with.

#### Recipients of personal data

The recipients of the personal data of the data subjects are/may be state administration and public authorities, courts and law enforcement authorities, lawyer, bailiff, postal service provider, persons providing accounting, IT and cloud services, subsidiaries of the controller, companies with which the controller is linked by property and personnel (i.e. controller and the recipient shows identical entities with direct or indirect ownership interest or identical persons controlling the company through voting rights directly or indirectly). The controller shall ensure the reliability of its partners as well as guarantees of confidentiality and, in the case of processing of personal data through an intermediary, the obligation to require the adoption of appropriate technical and organisational measures to ensure that the processing of personal data complies with the requirements of the GDPR.

#### Retention period

Personal data processed for the purpose of commercial and pre-contractual communication is stored for 15 years.

Personal data processed for the purpose of sending the newsletter are stored for the duration of the data subject's consent.

Personal data processed for the purpose of bookkeeping is kept for 10 years.

Personal data in the records of sent and received mail is kept for 5 years.

Personal data processed for the performance of the contract shall be retained for a period of 25 years from the end of the cooperation or until the settlement of the mutual rights and obligations arising therefrom.

Personal data processed for the purpose of debt recovery and participation in legal proceedings are retained for a period of 5 years from the final conclusion of the relevant proceedings.

#### Rights of the data subject

**RIGHT OF ACCESS TO PERSONAL DATA:** The data subject shall have the right to request from the controller access to personal data concerning the data subject. The data subject shall have the right to obtain confirmation from the controller as to whether personal data relating to him or her are being processed. Where the controller processes the personal data of the data subject, the data subject shall have the right of access to those data and shall be provided with all the information required by law concerning that processing. Where the data subject has made a request by electronic means, the information shall be provided in a commonly used electronic format, unless the data subject has requested otherwise. The controller shall provide a copy of the personal data which are processed only if such provision does not adversely affect the rights and freedoms of others.

**RIGHT TO CORRECTION:** The data subject shall have the right to have inaccurate personal data concerning him or her rectified by the controller without undue delay. Having regard to the purpose of the processing of the personal data, the data subject shall have the right to have incomplete personal data completed.

**RIGHT TO DELETION (REMOVAL):** the data subject shall have the right to have personal data concerning him or her erased by the controller without undue delay, provided that the conditions laid down by law are met and the exceptions to erasure laid down by law are not applicable.

**RIGHT TO LIMIT PROCESSING:** The data subject has the right to have the controller restrict the processing of personal data if the conditions laid down by law are met. These are the following cases: **a)** the data subject contests the accuracy of the personal data during a period allowing the controller to verify the accuracy of the personal data; **b)** the processing is unlawful and the data subject objects to the erasure of the personal data and requests instead the restriction of its use; **c)** the controller no longer needs the personal data for the purposes of the processing, but is needed by the data subject for the establishment, exercise or defence of legal claims; **d)** the data subject has objected to the processing of personal data which are processed in the public interest or for legitimate interest, including

profiling, pending verification that the legitimate grounds on the part of the controller override those of the data subject. Where the processing of personal data has been restricted on the basis of a request by the data subject, such personal data shall, with the exception of storage, be processed only with the consent of the data subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or of a Member State. The controller shall inform the data subject who has obtained the restriction of processing before the restriction of processing is lifted. The controller shall notify each recipient to whom the personal data have been disclosed of any rectification or erasure of personal data or restriction of processing, unless this proves impossible or requires disproportionate effort. The controller shall inform the data subject of those recipients if the data subject so requests.

**RIGHT TO TRANSMISSION OF PERSONAL DATA:** The data subject shall have the right to obtain 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 shall have the right to transfer such personal data to another controller if the processing is based on consent, explicit consent or a contract with the data subject or if the processing is carried out by automated means. The right of portability and its exercise shall not adversely affect the rights and freedoms of others.

**RIGHT TO OBJECT:** The data subject shall have the right to object, on grounds relating to his or her particular situation, to processing of personal data concerning him or her which is carried out for the purposes necessary for the performance of a task carried out in the public interest or in the exercise of official authority or is necessary for the purposes of the legitimate interests of the controller or of a third party, including objecting to profiling based on those purposes. The controller shall not further process the personal data unless it demonstrates compelling legitimate interests for the processing of the personal data which override the rights or interests of the data subject or grounds for exercising a legal claim. The data subject shall have the right to object to the processing of personal data concerning him or her for direct marketing purposes, including profiling to the extent that it is related to direct marketing. If the data subject objects to the processing of personal data for the purpose of direct marketing, the controller may no longer process the personal data for the purpose of direct marketing. The data subject shall have the right to object to processing of personal data concerning him or her on grounds relating to his or her particular situation, except where the processing of personal data is necessary for the performance of a task carried out for reasons of public interest where the personal data are processed for scientific, historical research and statistical purposes.

**RIGHT TO WITHDRAW CONSENT:** The data subject shall have the right to withdraw consent to the processing of personal data concerning him or her at any time if he or she has provided such consent. Withdrawal of consent shall not affect the lawfulness of the processing of personal data based on consent prior to its withdrawal. The data subject may withdraw the consent in the same way as he or she gave the consent. If the data subject has provided consent for the purpose of receiving the newsletter, he or she may withdraw the consent by clicking on the "Unsubscribe" link in the footer of any newsletter and sending a pre-configured form or by sending an e-mail with the relevant content (withdrawal of interest in receiving the newsletter) to the e-mail address [marketing@zj-antennas.com](mailto:marketing@zj-antennas.com).

### Request for personal data

If the legal basis for the processing is consent to the processing of personal data, the data subject is not obliged to provide personal data. The provision of personal data in such a case is based on the free discretion of the data subject and his voluntary action. Failure to provide personal data in such a case shall have no negative and substantial consequences for the data subject.

If the legal basis for the processing of personal data is the conclusion or performance of a contractual relationship, the provision of personal data is a requirement that is necessary for the conclusion or performance of the contract. Failure to provide personal data may result in the impossibility of entering into a contractual relationship.

Where the legal basis for the processing of personal data is a legitimate interest, the data subject shall be obliged to accept the processing, but shall have the right to object to it. Where the legal basis for the processing of personal data is a specific legal provision or the performance of a task carried out in the public interest or in the exercise of official authority, the data subject's obligation to provide the data, as well as the consequences of failure to provide the data, depend on the purpose of the processing and are therefore specific to each processing activity. In such cases, the data subject is obliged to provide personal data. Failure to provide personal data may result, for example, in the impossibility of issuing a decision requested by the data subject, the impossibility of concluding an employment relationship, obstruction of official authority, liability for damages to the controller, breach of labour discipline.

### Automated individual decision-making, including profiling

The controller does not use decision-making based solely on automated processing, nor does it carry out profiling. The controller shall take all decisions involving the processing of personal data with the involvement of the human element. Should these procedures ever have to be modified in a particular case, the controller shall immediately inform the data subject in order to enable him or her to exercise his or her rights and shall comply with all procedures provided for by law.

### Transfer of personal data to third countries

The controller does not transfer personal data of data subjects to third countries and does not intend to do so, with the exception of the United Kingdom and the United States of America (to companies participating in the Privacy Shield Framework), which are countries where an adequate level of protection of personal data is guaranteed in accordance with Article 45 of the GDPR by virtue of a Commission Decision (EU) and no further authorisation

is required for transfers to these countries (in the case of the USA, to companies participating in the Privacy Shield Framework). Should this situation change in the future, the controller will inform the data subject and ensure that all legally required procedures are followed.

### Privacy Breach Notification

The controller has adopted and systematically reviews and updates appropriate technical and organisational measures to ensure that personal data are processed in a manner that is consistent with data protection legislation. If, despite all the measures taken, in an exceptional case, a personal data breach occurs which is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall, without undue delay, notify the data subject of the personal data breach, unless the situation is covered by an exemption provided for by law.

### Handling the rights of data subjects

#### Right to lodge a complaint with the supervisory authority

The rights of data subjects shall be understood in particular as the right of access to personal data, the right to rectification of personal data, the right to erasure of personal data, the right to restriction of the processing of personal data, the obligation to notify the rectification, erasure or restriction of the processing of personal data, the right to data portability, the right to object to the processing of personal data, the right of the data subject not to be subject to a decision which is based solely on automated processing of personal data, including profiling.

The data subject may exercise the rights in question by delivering a written request to ZJ Antennas, s.r.o., Štefánikova 61, 085 01 Bardejov.

The controller shall provide the data subject with information and notices concerning the processing of his or her personal data in a concise, transparent, intelligible and easily accessible form, clearly worded, in particular for information specifically addressed to a child. The information shall be provided in paper or electronic form, as a general rule in the same form as the request. If the data subject so requests, the information may also be provided orally by the controller if the data subject proves his or her identity in another way. The controller shall assist the data subject in exercising his or her rights. The controller shall not be obliged to act if the person cannot be identified. The controller shall be obliged to verify the identity of the person. The controller shall provide the data subject with information on the measures taken following his or her request to exercise his or her data subject rights within one month of receipt of the request. That period may be extended by a further two months by the controller in justified cases, taking into account the complexity and the number of requests, including repeatedly. The controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the extension. Where the data subject has made the request in electronic form, the controller shall provide the information in electronic form, unless the data subject has requested the information in another way. If the controller does not take action on the basis of the data subject's request, the controller shall, within one month of receipt of the request, inform the data subject of the reasons for the failure to act and of the possibility of bringing an action before the Data Protection Authority. The information and the notifications and measures taken pursuant to the exercise of the abovementioned rights shall be provided free of charge. Where the request of the data subject is manifestly unfounded or disproportionate, in particular because of its repetitive nature, the controller may: (a) charge a reasonable fee, taking into account the administrative costs of providing the information, or a reasonable fee, taking into account the administrative costs of the notification, or a reasonable fee, taking into account the administrative costs of carrying out the requested measure, or (b) refuse to act on the request. The controller may request additional information necessary to confirm the identity of the data subject where the controller has reasonable doubt as to the identity of the natural person making the request. The information to be provided to the data subject may be given in combination with standardised icons in order to provide a highly visible, clear and comprehensible overview of the intended processing of personal data.

If the data subject considers that his or her personal data are not processed in accordance with the law, he or she may lodge a complaint with the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27, tel. no.: +421 /2/ 3231 3214; mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk), <https://dataprotection.gov.sk>.