



# Data Protection Notice

## Contractual partners (natural persons) and employees of the contractual partners

Dear Data Subject,

We would like to inform you how and for what purpose we process your personal data and we want to point out your rights in the personal data protection area.

With any questions or with exercising of your rights in personal data protection area please contact directly our Data Protection Officer through contacts listed below.

Our goal is to protect privacy, confident information and personal data entrusted to us with as much effort as possible. According to this commitment we are committed to ensure appropriate security and use of personal data.

For more details about conditions of data processing refer to following sections of this document.

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## Who is the controller?

Under relevant data protection legislation, following companies, acting as a joint controller, are Controllers of personal data:

- **KPMG Slovensko Advisory, k.s.**, with its registered seat: Dvořákovo nábrežie 10, 811 02 Bratislava, Business Identification No.: 31 403 417, registered with the Commercial Register of District Court Bratislava I, Section: Sr, Insert No.: 272/B,
- **KPMG Slovensko spol. s r.o.**, with its registered seat: Dvořákovo nábrežie 10, 811 02 Bratislava, Business Identification No.: 31 348 238, registered with the Commercial Register of District Court Bratislava I, Section: Sro, Insert No.: 4864/B,
- **KPMG Legal s.r.o.**, with its registered seat: Dvořákovo nábrežie 10, 811 02 Bratislava, Business Identification No.: 47 238 623, registered with the Commercial Register of District Court Bratislava I, Section: Sro, Insert No.: 81210/B,
- **KPMG Valuation s. r. o.**, with its registered seat: Dvořákovo nábrežie 10, 811 02 Bratislava, Business Identification No.: 44 744 820, registered with the Commercial Register of District Court Bratislava I, Section: Sro, Insert No.: 58279/B,

(hereinafter “**KPMG member firms**”).

You can contact us any time at following contacts:

KPMG

Dvořákovo nábrežie 10

811 02 Bratislava

tel: +421 2 59984 111

[kpmg@kpmg.sk](mailto:kpmg@kpmg.sk); <https://home.kpmg.com/sk/sk/home.html>

## How can I contact the Data Protection Officer?

You can contact Data Protection Officer with any question related to processing of personal data by the Controller or to exercising of your rights as Data Subject at the following email address [privacy@kpmg.sk](mailto:privacy@kpmg.sk). You can report to Data Protection Officer any data breach and any suspicion of violation of rights in the data protection area.

## Who might be a data subject?

Data subjects, whose personal data we are processing under this Data Protection Notice are in particular the following categories of persons:

- Contractual partners – natural person, e.g. clients, contractors, employees; and
- Employees of contractual partners or person in similar relation to business partner.



**What is the purpose and on what legal basis we are processing personal data, what is the retention period and how we collect your personal data and what is consequence in case of not providing personal data and who is recipient of personal data?**

The above mentioned information you can find below classified according to categories of Data Subjects.

Employees of contractual partners

- Your personal data are processed for the **purpose** of providing service by one of KPMG member firms based on contract with your employer (i.e. you as a Data Subject are not a party to a contract to which the processing activity relates);
- The **legal basis** of these processing activities is the legitimate interest of KPMG member firms in proper provision of the services.
- Personal data are **collected**:
  - **Directly from you**, e.g. from business card or meetings, identification in contract, or other documents which you give us personally or send us via email or other means of electronic communication;
  - **From third party**, which are in employment or other similar relation with your employer.
- The **retention period** of your personal data is set out by relevant legislation (mainly Act on archives and registries, Act on accounting) and Registry plan. Your personal data will not be stored longer than it is necessary. Retention period of your personal data is o reach above mentioned purpose is 10 years.
- Providing personal data to KPMG member firms for the mentioned purposes may in some cases be a contractual requirement or requirement that is necessary for the conclusion of a contract. Data subject **is not obliged to provide** the personal data to the Controller. As a **result of their non-disclosure** it may not be possible to provide the services to your employer or it will be more difficult to provide them.
- Provided that this is necessary to protect our interest, exercising our rights KPMG member firms **provide** your personal data in proportional extent to **following recipient**:
  - Relevant Public Authorities (e.g. Tax office, social security authorities);
  - Law enforcement authorities;
  - competent courts.

Contractual partners – natural persons

- Your personal data are processed for the purpose of providing services by one of the KPMG member firms based on contract concluded with you.
- The **legal basis** of these processing activities is the fulfilment of a contract to which you are a party, or to make pre-contractual arrangements at your request..
- Personal data are **collected**:



- **Directly from you**, e.g. from communication or a meeting, from identification in a contract or other documents give us or send us personally or via email or via other means of electronic communication or from your pre-contractual relationship with KPMG member firms;
- from **public and non-public** registries, mainly from commercial register and trade register;
- the **retention period** of your personal data is set out by relevant legislation (mainly Act on archives and registries, Act on accounting) and Registry plan. Your personal data will not be stored longer than necessary. Retention period of your personal data to achieve listed purpose is 10 years. In case you were, as our contractual partner, included in the internal database of employees of KPMG (SK-DL ALL Staff) your personal data will be stored according to retention periods set for our employees.
- Providing personal data to KPMG member firms for the mentioned purposes may in some cases be a contractual requirement or requirement that is necessary for the conclusion of a contract. The data subject **is obliged to provide** personal data to the controller. As a **result of their non-disclosure** it may not be possible to provide the services to your employer or it will be more difficult to provide them.
- Provided that this is necessary to protect our interest, exercising our rights KPMG member firms **provide** your personal data in proportional extent to **following recipient**:
  - Relevant Public Authorities (e.g. Tax office, social security authorities);
  - Law enforcement authorities;
  - competent courts.

#### Internal quality and risk management

- We also process your personal data for the purpose of performing internal controls, the subject of which is internal risk assessment and quality assurance and compliance with professional standards in the provision of services;
- More detailed information on this processing activity you can be found on [privacy page](#) (**third parties**).

#### **Where do we process your personal data?**

We are processing your personal data for here mentioned purposes mostly in the European Union. However, within processing operations listed in this Notice, personal data are occasionally also transferred (except processing data within EU) to a third country. Cross-border transfer takes place in connection with internal controls, the subject of which is internal risk assessment and quality assurance and compliance with professional standards in the provision of services. Appropriate safeguards for transfer of personal data to third countries are ensured in the form of standard data protection clauses according Article 46 of GDPR.

#### **Which categories of personal data are we processing?**

We are processing common categories of personal data (e.g. name, surname, email, job, employer and other).



### How do we process your personal data?

Processing of your personal data can be manual or automated, when your personal data is processed in our information systems or information systems of our Processors.

Your personal data are processed only by selected employees of KPMG member firms. In this relation we take care that only trained and selected employees have access to your personal data and they fulfil obligations of confidentiality in relation to all the data (personal or other) that they learned during the performance of their work.

Personal data are not subject to automated individual decision-making, including profiling.

### What are your rights in the data protection area?

Under relevant data protection legislation (unless generally binding legal regulations do not stipulate otherwise), you have a right to:

- **information** about processing of your personal data;
- **access** to your personal data, including the right to obtain copy of your personal data processed by us;
- **portability of the data** which you have provided to us (in a structured, commonly used and machine-readable format) and which we are processing based on your consent by automated means; you have the right to transmit those data to another Controller (if such transfer is technically feasible);
- **rectification** of your wrong, inaccurate or outdated personal data. When accuracy of your data is questionable you can request **restriction** of its processing until we will be able to check its accuracy;
- **restriction of processing** of personal data under condition that the personal data will be stored but not processed;
- **erasure ('right to be forgotten')** of your personal data in cases specifically allowed by data protection legislation, e.g.:
  - your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  - you would object to processing of personal data processed on the basis of our legitimate interest and we would not demonstrate necessary legitimate reasons for our processing that would outweigh your interests and rights and freedoms;
- any time **contact** our Data Protection Officer by using any communication means mentioned in this document. You can also contact the Data Protection Officer in case you think that we breach your rights under data protection legislation;
- when you believe that in relation to processing of your personal data, your rights were breached or that you were directly affected by such breach, you have a right to lodge a complaint with a supervisory authority (Úrad na ochranu osobných údajov Slovenskej republiky,



address Hraničná 4826/12, 820 07 Bratislava – Ružinov, tel. number: +421 /2/ 3231 3214;  
mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk), <https://dataprotection.gov.sk/uouu/>) or to a relevant court.

### What is your right to object?

You have **right to object** any time to the processing of your personal data, which is performed on the basis of our legitimate interest. Objection could be lodged to our Data Protection Officer personally or by using any of our listed contacts.

When we consider that our legitimate interest prevails over your interest or rights and freedoms, we can continue to process your personal data. When your objection will be appropriate, we stop processing your personal data for this purpose.

### How often do we update this notice?

This information is periodically reviewed and could be changed from time to time (in order to comply with new legislation and to reflect our current privacy practices). Updated versions will be available on our web site.

Last updated on: 15. 10. 2020.