



# Data Protection Notice

## Direct Marketing

Dear Data Subject,

We would like to inform you about how and for what purpose we, as Data Controller, process your personal data (sometimes referred to as "personally identifiable information" or "PII") and as well as about your rights under the relevant data protection legislation.

In case of any questions or when exercising your rights under relevant data protection legislation please contact directly our Data Protection Officer through the contacts listed below.

Our goal is to protect privacy, confident information and personal data entrusted to us. We are committed to ensure appropriate security and use of personal data.

More details of conditions under which we process your personal data can be found in the following sections of this document.

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## Who is a Controller?

Under relevant data protection legislation, following companies, acting as a **joint controllers**, 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 Municipal Court Bratislava III, 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 Municipal Court Bratislava III, 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 Municipal Court Bratislava III, 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 Municipal Court Bratislava III, Section: Sro, Insert No.: 58279/B,

(hereinafter “the **KPMG member firms**”). You can find more information regarding the joint controllers in the Joint controllers section of this Data Protection Notice.

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 Data Protection Officer?

You can contact Data Protection Officer with any question related to the processing of personal data by the Controller or when exercising of your rights as Data Subject at the following e-mail 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 can be a Data Subject?

Data subjects whose personal data are processed as part of the processing activities specified in this Privacy Notice are in particular the following categories of persons:

- former employees of KPMG member firms;
- business partners;
- employees of business partners;
- journalists;



- potential clients or employees of potential clients.

## **What is the purpose and legal basis of processing of your personal data, what is the retention period; how do we collect your personal data; what is the consequence of not providing the personal data; who is the recipient of the personal data?**

Your personal data are processed for **the purpose** of direct marketing of our services.

**Legal basis** for our processing activities is our legitimate interest to promote our services.

Personal data are collected:

- directly from you, for example from your business card, e-mail signature, identification in a contract or other documents provided to us or sent to us by e-mail or other electronic means, provided to us at any training organized by KPMG member firms; or
- from public or private databases, mainly from commercial register, web site of your employer / company; and
- exceptionally from third parties in business, employment or other relationship with you.

We keep your personal data for the duration of our legitimate interest and in accordance with applicable legislation (in particular Act No. 395/2002 Coll., on Archives and Registers and on amendments of certain acts as amended) and our Registry Plan. **Retention period** of your personal data in order to achieve our legitimate interest is 5 years, in case your personal data was collected in connection with provision of our services, 10 years. We will not keep your personal data longer than it is necessary.

The Data subject is not obliged to provide personal data to the controller. **Consequence of not providing** the personal data is however, that the respective data **subject** cannot be signed to automatic receiving of our marketing activities (e.g. sending of following communication: newsletter, notifications to important legislation changes, invitations to events organized by KPMG member firms).

KPMG member firms engaged the following Processors for the data processing for this processing purpose: HubSpot Inc., Cambridge, MA 02141, United States of America; Survey Monkey Europe UC, with its registered seat: Shelbourne Rd, Ballsbridge, Ireland. The Controller does not provide the personal data to any third party.

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

We process your personal data for the above purposes in the European Union, whereby part of the personal data is transferred to the processor, the company HubSpot Inc., to the USA.

An adequate level of protection of your personal data processed in a third country is ensured as follows:  
— in the case of transfer to the United States of America through the EU – U. S. Data Privacy Framework, under which HubSpot Inc. is certified.

You can find more information about the EU – U. S. Data Privacy Framework at the following link:  
<https://www.dataprivacyframework.gov/>



## Which categories of personal data we process?

We process regular categories of personal data (e.g. name, surname, e-mail adress, job position, employer).

## 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. The processing of personal data may also include assesment of the data subject's user behavior based on the information obtained on the data subject's activity during the performed marketing campaigns in order to better understand the data subject by relevant internal employees of KPMG member firms.

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

Under relevant data protection legislation you have a right to:

- **information** about the processing of your personal data;
- **access** to your personal data, including the right to obtain a copy of your personal data processed by us;
- **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 personal data will be stored but not processed;
- **right 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 object processing of your personal data to direct marketing purposes;
- **right to object** any time to the processing of your personal data;
- 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 your rights under data protection legislation were breached;
- when you believe that in relation to the 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, adress 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 you rise such objection, we will stop processing your personal data for this purpose.

## Joint controllers

The companies KPMG Slovensko spol. s r.o., KPMG Slovensko Advisory, k.s., KPMG Legal s.r.o. and KPMG Valuation s.r.o. (for the purposes of this chapter, jointly referred also as "KPMG in Slovakia") are in the position of joint controllers in the processing of your personal data carried out in accordance with this Data Protection Notice.

In order to define the terms of the joint processing of personal data, the companies of KPMG in Slovakia have concluded a Joint Controllership Agreement (hereinafter referred to as "Agreement"). Pursuant to the Agreement, company KPMG Advisory will provide the respective data subject with the essential details of the Agreement in accordance with Article 26 (2) of GDPR, based on data subject's prior request.

Based on the Agreement, the exercise of your rights will be carried out by the company KPMG Slovensko Advisory, k.s., as a designated contact point for data subjects. As a data subject, you can exercise your rights at any of the KPMG in Slovakia companies, through the contact channels listed in the section " How can I contact the Data Protection Officer?" of this Information on the processing of personal data, or in writing at the address of the KPMG Slovakia companies listed in the section " Who is the Controller?" of this Data Protection Notice.

## How often do we update this document?

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: 27.06.2024.