



# Data Protection Notice

## Subject of the registry and the accounting records

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 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 “the **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:

- current and former employees of KPMG member firms;
- business partners and their employees;
- clients and their employees;
- potential clients or the employees of such potential clients; and
- any other data subjects whose personal data may be included in accounting or registry records.



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

Your personal data are processed for the **purpose** of maintenance of accounting and management of registry records of KPMG member firms.

**The legal basis** of the aforementioned processing operations is the fulfilment of our statutory obligations imposed by the Act No. 395/2002 Coll. on archives and registers as amended, Act no. 431/2002 Coll. on accounting, as amended, and any other legislation which implement the aforementioned legislation or impose duties in the area of accounting and registry administration.

Personal data are collected:

- **directly from you**, for instance from communication or negotiation, from contract identification, or from other documents you submit to us personally or by e-mail or other electronic forms of communication or from the data you provide to us when you participate in training organised by one of KPMG's entities or in the context of employment relationship, contractual or pre-contractual relationships that you or your employer have with any KPMG entity;
- **From public and non-public registers and records**, particularly from the commercial register, the trade register, the website of your employer/business; and exceptionally
- **From the third parties** who are in a contractual, employment or similar relationship with you.

We generally retain your personal data **for the period** of time prescribed by law (especially the Archives and Registry Act and Act on Accounting) and our registry plan. We will not store your data longer than necessary.

Personal data which is the subject of accounting or registry records is originally acquired by the controller for various purposes (e.g. performing tasks within the scope of personal and wage agenda, providing advisory services to clients). Information on whether the provision of personal data is a legal or contractual requirement or a requirement that is required to conclude a contract, whether the data subject is required to provide personal data, and the possible consequences if refused to provide such data are therefore described, in more detail, in the corresponding information on the processing of personal data which can be found on the KPMG web site at <https://home.kpmg/sk/sk/home/misc/privacy.html>

KPMG authorized the following Processor to process the personal data for this purpose: F.M. Servis s.r.o., with its registered seat Pod rovniciami 65, Bratislava 841 04, Slovak republic. Provided that it is necessary to meet the controller's obligations, KPMG may provide your personal data of the proportionate extent to the following recipients:

- suppliers and clients (particularly if accounting records provide for such personal data);
- relevant administrative public authorities (tax administrators, social security authorities, health insurance companies)
- law enforcement authorities; and
- competent courts.



### Where do we process your personal data?

We are processing your personal data for listed purposes only in the European Union. We do not transfer personal data to third countries or international organization.

### Which categories of personal data do we process?

The subject of our personal data processing are mainly regular personal data categories (e.g. name, surname, email address, job position, employer, and other data which can be stated in accounting or registry records)

However, the registry records may also contain a specific personal data category such as information relating to health condition of a KPMG employee which the controller originally processed within his payroll and human resources/personal agenda.

### 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 it about 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 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: 15. 10. 2020.