

Regulation (EU) No. 2016/679 of the European Parliament and the Council 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) – “GDPR” entered into effect on 25 May 2018¹. Pursuant to Article 13 of the GDPR and Sec. 19 of the Personal Data Protection Act, the NAFTA a.s. company is obliged to provide you with the following information²:

1) Identity and contact details of the Controller:

The Controller (Art. 4 (6) of the GDPR and Sec. 5 (o) of the Personal Data Protection Act) is NAFTA a.s., Votrubova 1, 821 09 Bratislava, Organization ID No. 36286192, incorporated in the Commercial Register of the Bratislava I District Court, Section Sa, Entry No. 4837/B, Contact Data: tel.: +421(0)2 4024 2111, e-mail: gdp@nafta.sk, <http://www.nafta.sk> (“Company”).

2) - Purpose and Legal basis for processing personal data:

The Company is processing your personal data in order to maintain the register of shareholders and for the purposes of communication with shareholders, payment of dividends, withholding and payment of contributions toward public health insurance (only compulsory health insurance in Slovakia for individuals), and of withholding tax to the relevant tax administrator. The legal basis for the processing of your personal data involves compliance by the Controller with legal obligations (Art. 6 (1) (c) of the GDPR and Sec. 13 (1) (c) of the Personal Data Protection Act) - registration of the Company’s shareholders, payment of dividends in cash, payment of contributions towards public health insurance and payment of withholding tax, and this legal basis includes also your consent to personal data processing (Art. 6 (1) (a) of the GDPR and Sec. 13 (1) (a) of the Personal Data Protection Act) - payment of dividends via a cashless transfer to a bank account.

3) Recipients and categories of recipients:

Recipients are those employees of the Company who are authorized to process shareholder personal data, based on their positions and authorization granted by the Company. Other categories of recipients include: the company securing execution of changes in the Register of Shareholders, organization of general meetings, and sending of correspondence to shareholders, the company that secures shareholders’ voting at general meetings, the company that secures sending of regular mail and collection of returned (undelivered) mail and banks.

4) Transfer of personal data to third countries or to an international organization:

The Company is not transferring your personal data to any third country or to any international organization.

5) Retention period for personal data:

The Company will keep your personal data throughout the period of existence of a relationship between the Company and you, as the Company’s shareholder, for the period necessary to comply with the obligations and to exercise the rights of the Company resulting from that relationship and relevant legal regulations (the personal data processed based on Art. 6 (1) (c) of the GDPR and Sec. 13 (1) (c) of the Personal Data protection Act), or throughout the term of your consent to the processing of personal data (personal data processed based on Art. 6 (1) (a) of the GDPR and Sec. 13 (1) (a) of the Personal Data Protection Act). You may withdraw your consent to personal data processing (only personal data processed under Art. 6 (1) (a) of the GDPR and Sec. 13 (1) (a) of the Personal Data Protection Act) at any time (see 6 and 7).

6) Your rights as a data subject:

You have the right to request access to your personal data - upon your request, the Company will provide you with the information about the categories of your personal data that the Company processes, the purpose for which such data are processed, to whom personal data have been provided, and the expected period of personal data retention. You have the right to request correction of incorrect personal data or to supplement them if they are incomplete. You also have the right to request erasure of the personal data that are no longer necessary for the purpose for which they have been originally collected or processed. You are entitled to request limitation of personal data processing - you may ask the Company to refrain from erasing your personal data that the Company would be otherwise obliged to erase and you may ask the Company to refrain from working with your personal data until it is clear whether the processed data are accurate or whether your objection against the personal data processing is justified. You may withdraw your consent to personal data processing while it is in effect (only personal data processed under Art. 6 (1) (a) of the GDPR and Sec. 13 (1) (a) of the Personal Data Protection Act), you are entitled to portability of your personal data - provided that it is technically feasible, and you may request that the Company provide you with your personal data that you have disclosed to the Company and that the Company processes in an electronic form. In such a case, you may withdraw your consent at any time in the same manner in which you have granted the consent to the Company (i.e. in writing). In such a case, your personal data will not be processed further and the Company shall erase the data in compliance with the requirements of the GDPR and the Personal Data Protection Act. Withdrawal of the consent will not affect the lawfulness of the processing of your personal data prior to the consent withdrawal.

If you believe that your rights have been violated in connection with the processing of your personal data, you have the right to file a complaint with the supervisory authority - the Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27, tel. 02 323 132 14, e-mail: statny.dozor@pdp.gov.sk, <https://dataprotection.gov.sk/uouu/sk>.

7) How may you exercise your rights?

You may exercise your rights (including the right to withdraw the consent) with the Controller - the Company in either of the following manners: in writing or via e-mail (the contact data are stated above in clause 1).

8) Information under Article 13 (2) (e) of the GDPR (Sec. 19 (2) (e) of the Personal Data Protection Act):

Disclosure of your personal data is a requirement resulting from the legal regulations stipulating the obligations of the Company in connection with keeping of the Register of Shareholders and payment of dividends (especially the Commercial Code, Health Insurance Act, and Income Tax Act).

¹ The GDPR is implemented into the Slovak law through Act No. 18/2018 on personal data protection (“Personal Data Protection Act”)

² The current wording of the information about personal data is available at the Company’s website in “Protection of Personal Data” (or in “Shareholders”)

9) Automated decision-making and profiling within processing of your personal data:

Automated decision-making means the decision-making carried out by a machine (computer) without human intervention associated with legal or other similarly serious effects in respect of you. No such processing is carried out by the Company.