

PRIVACY POLICY - PERSONS OUTSIDE THE COMPANY

1. IDENTIFICATION OF CONTROLLER AND GENERAL INFORMATION

This privacy policy (hereinafter as "**Privacy policy**") contain information on the processing of your personal data by the company **Považský cukor a.s.**, with its registered office at Cukrovarská 311/9, 914 01 Trenčianska Teplá, company number: 35 716 266, registered with the commercial register of the District Court Trenčín, section: Sa, insert no. 10298/R (hereinafter as "**Controller**" od "**we**" in a respective grammatic form), if you are not an employee or member of the Controller's body (e.g. *if you are a visitor to the Controller's premises, a customer or a representative of the Controller's business partner*).

You can contact the Controller and his data protection officer in matters concerning the processing of personal data at the address **Považský cukor a. s., Cukrovarská 311/9, 914 01 Trenčianska Teplá** or by e-mail to the email addresses info.sk@nordzucker.com or dpo@nordzucker.com.

The Controller is hereby (via this Privacy policy) informing you why your personal data are processed, how they are processed, for how long they are processed, what your rights regarding the processing of your personal data and provides you with other relevant information on the processing of your personal data. Via this Privacy policy, the Controller is fulfilling his information obligation to all data subjects, whether the personal data are obtained directly from you as data subjects or from other source.

The Controller processes your personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of 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) (hereinafter as "**Regulation**"), with Act no. 18/2018 Coll. on the protection of personal data and on the amendment of certain laws (hereinafter as "**Act**") and other legislation in relation to personal data protection (hereinafter as "**Personal data protection legislation**").

2. PURPOSES, LEGAL BASIS, CATEGORIES OF PROCESSED PERSONAL DATA AND RETENTION PERIODS

The Controller processes your personal data only for justified purposes, for a limited time and with the use of the maximum possible level of security. **The Controller processes personal data only if there is a legal basis for their processing (in accordance with the principle of legality).** The Controller also processes your personal data in accordance **with the principle of minimization**, always only to the extent that the intended purpose of the processing is fulfilled. **This means that the Controller does not request personal data from you that are not necessary for the specific purpose of processing.**

Specific information on the purposes of the processing, the legal bases for their processing, the categories of processed personal data and the specified retention period can be found in the table below:

Purpose of the processing	Legal basis	Legal basis	Personal data or categories of personal data	Retention period
Processing of accounting documents	Art. 6 (1) letter c) of the Regulation, Act no. 431/2002 Coll. on accounting as amended, Act no. 222/2004 Coll. on value added tax, as amended	The processing of personal data is necessary for the compliance with legal obligations to which the Controller is subject	Ordinary personal data necessary to fulfil legal obligations stated on the accounting documents	10 years following the year to which they relate

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Processing of documents in accordance with the registry rules and the Controller's registration plan, including the processing of received and sent mail	Art. 6 (1) letter c) of the Regulation, Act no. 395/2002 Coll. on Archives and Registries and on Amendments to Certain Acts, as amended, Act no. 395/2013 Coll. on the electronic form of the exercise of powers by public authorities (the e-Government Act), as amended	The processing of personal data is necessary for the compliance with legal obligations to which the Controller is subject	Ordinary personal data necessary to fulfil legal obligations	In accordance with the relevant provisions of Act no. 395/2002 Coll. on archives and registries and on the amendment of certain laws as amended
Records and conduct of judicial and administrative proceedings	Art. 6 (1) letter c) Regulation, Act no. 160/2015 Coll. Civil Dispute Procedure as amended, Act no. 307/2016 Coll. on Reminder Procedure and on Amendments to Certain Acts, Act no. 71/1967 Coll. on administrative proceedings as amended (Administrative Procedure Code)	The processing of personal data is necessary for the compliance with legal obligations to which the Controller is subject	Ordinary personal data and a special category of personal data necessary to fulfil legal obligations and defend legal claims	10 years following the year to which they relate
Processing of applications of the data subjects when exercising their rights	Art. 6 (1) letter c) of the Regulation, Act no. 18/2018 Coll. on the protection of personal data and on the amendment of certain laws	The processing of personal data is necessary for the compliance with legal obligations to which the Controller is subject	Ordinary personal data necessary to fulfil legal obligations	Until the application of data subject is processed
Records of the exercised rights of the data subjects and records of the ways of handling of the exercised rights of the data subjects	Art. 6 (1) letter f) Regulation	The processing of personal data is carried out for the purposes of legitimate interests pursued by the Controller, which consist in the need to ensure the registration of the exercised rights of data subjects for possible control of the supervisory authority and proof of compliance with the controller's obligations under relevant legislation	Ordinary personal data necessary to fulfil legal obligations	5 years following the year to which they relate

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Transfer of personal data within a group of companies for administrative purposes	Art. 6 (1) letter f) Regulation	The processing of personal data is carried out for the purposes of legitimate interests pursued by the Controller, which lay in the need to ensure the necessary transfer of information - and within them personal data within the group of companies of which the controller is a member for administrative purposes. services of the Controller's client, performance of internal controls, business activity of the Controller, processing of the controller's accounting, and information security and information technology services	Ordinary personal data (name, surname, contact data, employer)	During the contractual relationship with business partner, not more than 3 years after the termination of the or contractual relationship with business partner
Fulfilment of the contractual obligations of the Controller arising from contracts concluded with natural persons (in particular the processing of orders and the fulfilment of contracts, including leases and activities related to the sale of company official vehicles)	Art. 6 (1) letter b) of the Regulation	The processing of personal data is performed during the performance of the contract and during the execution of pre-contractual relations	Ordinary personal data necessary to fulfil contractual obligations	During the duration of the contractual relationship and after its termination until the full settlement of contractual and other claims arising from the contractual relationship
Records of suppliers, customers and other business partners (their contact persons / representatives, if they are legal persons) in contractual relations	Art. 6 (1) letter f) of the Regulation	The processing of personal data is carried out for the purposes of legitimate interests pursued by the Controller, which is the interest in the registration of business partners / contact persons of business partners in the position of legal entities for accounting purposes, internal control and	Ordinary personal data (name, surname, telephone contact, e-mail, position and affiliation to the company – business partner)	5 years following the year in which the contract expired

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		enforcement of legal and other claims arising from concluded contracts with legal persons		
Conducting business communication with representatives of business partners - legal entities	Art. 6 (1) letter f) of the Regulation	The processing of personal data is carried out for the purposes of legitimate interests pursued by the Controller, which consists in the need to ensure and agree on the conditions and details of the fulfilment of the contractual obligations of the Controller	Ordinary personal data (name, surname, telephone contact, e-mail, position and affiliation to the organization)	During the duration of the contractual relationship with business partner and after its termination until the full settlement of contractual and other claims arising from the contractual relationship with the business partner - legal entity
Verification of the conditions of employment by service and labour suppliers in order to assess whether the service and labour supplier does not violate the prohibition of illegal employment	Art. 6 (1) letter c) Regulation, Act no. 82/2005 Coll. on Illegal Work and Illegal Employment and on Amendments to Certain Acts, as amended	The processing of personal data is necessary for the compliance with legal obligations to which the Controller is subject	Personal data necessary for the Controller to be able to check whether the supplier of services or works does not violate the prohibition of illegal employment according to § 7b par. 6 of Act no. 82/2005 Coll. on Illegal Work and Illegal Employment and on Amendments to Certain Acts as amended	5 years following the year to which they relate
Handling of complaints and keeping prescribed records related to it	Art. 6 (1) letter c) Regulation, Act no. 513/1991 Coll. Commercial Code as amended, Act no. 40/1694 Coll. Civil Code as amended	The processing of personal data is necessary for the compliance with legal obligations to which the Controller is subject	Current personal data necessary to fulfil legal obligations	4 years following the day of the complaint, in the case of compliant submitted by natural persons - non-entrepreneurs 3 years following the day of the complaint

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Taking of and publication of photographs of the data subjects on the Controller's promotional materials and other communication channels during the Controller's presentation activities and during promotional or corporate events organized by the Controller (e.g. exhibitions, Controller's open doors days, seminars and training events)	Art. 6 (1) letter a) of the Regulation	The processing of personal data is carried out on the bases of the consent granted by the data subject	Photography	5 years from the date of the consent or until its revocation, whichever occurs first
Taking of and publishing photographs capturing the course of events organized by the controller, which do not capture the faces of natural persons and are captured for the purpose of documenting and presenting events organized by the controller and their course and publishing them on promotional materials of the controller and in other communication channels during the presentation activities of the controller	Art. 6 (1) letter f) of the Regulation	The processing is carried out for the purposes of controller's legitimate interest, which is interest in documenting the course of events and their organization and informing the public or selected persons about these events	Elements of the images of data subjects that may be used to make them identifiable in association with other identifiers under certain conditions	5 years from the end of the year in which the event took place, unless otherwise specified in a particular case (for example, if the photo is archived in accordance with the registry plan of the company for archiving purposes)

Organizing competitions for the public and announcing the winners	Art. 6 (1) letter a) of the Regulation	The processing of personal data is carried out on the bases of the consent granted by the data subject	Ordinary personal data within the meaning of the competition statute, in particular name, surname, residential address / correspondence address	1 year following the end of the year in which the competition took place - winners of the competition, other participants during the competition and the necessary time after its end (necessary for deletion of personal data)
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In relation to securing the personal data, the Controller has adopted internal documentation, in which adequate security measures are further specified. Security measures have been adopted in order to secure the processing of your personal data.

3. SOURCE OF THE PERSONAL DATA

The Controller obtains your personal data directly from you as a data subject, in case you provide the Controller with your personal data (for example when you enter into a contract with the Controller or when you grant a consent to the Controller regarding your photos). **In some cases**, especially if a service is ordered from the Controller by a **business company or other entity of which you are a representative of or a contact person**, the source of your personal data is this entity.

If you do not provide the Controller with your personal data in some cases, the Controller would not be able to deliver the goods, enter into a contract with you and fulfil its other legal and contractual obligations.

4. TO WHOM THE CONTROLLER PROVIDES YOUR PERSONAL DATA?

Your personal data may be in some cases provided to public authorities, which are entitled to process your personal data, e.g. to courts, law enforcement authorities or other inspection authorities.

Your personal data may also be provided to other companies (entities) in the Nordzucker Group, to the extent necessary for internal administrative purposes. This transfer is carried out on the basis of the legitimate interest of the Controller. When providing specific administrative services related to the provision of internal management systems and information recording systems in the field of IT security and support by the parent company Nordzucker AG (Germany), the parent company acts as a data processor and the transfer of your personal data is carried out on the basis of a concluded contract on the processing of personal data.

Other recipients of your personal data include, in some cases, law firms, executors, notaries, insurance companies or banks, which act as independent controllers.

5. TRANSFER TO THIRD COUNTRIES AND INTERNATIONAL ORGANISATIONS AND PROFILING

When processing your personal data, it is not transferred to third countries or international organizations.

6. HOW LONG DOES THE CONTROLLER STORE YOUR PERSONAL DATA?

The Controller always stores personal data in accordance with the principle of minimization. This means that it processes personal data only during the period during which it is necessary to keep the personal data. After this period, the Controller will delete the personal data, unless otherwise provided by law. The specific retention

periods are set by the Controller in its registration plan in accordance with the relevant legal regulations, as mentioned above, in the **table of purposes**.

The Controller will also provide you with more detailed information on the retention period of your personal data if you so request.

7. DOES THE CONTROLLER USE PROFILING AND AUTOMATED DECISION-MAKING?

The Controller does not use profiling when processing your personal data and does not process personal data in any form of automated individual decision-making, in which your personal aspects would be evaluated.

8. WHAT ARE YOUR RIGHTS IN RELATION TO PERSONAL DATA PROCESSING?

As the data subject, your rights regarding the processing of your personal data are as follows:

Your rights	
Right of access - You have the right to obtain a copy of the personal data which we hold about you, as well as the information on how we use your personal data. In most cases, your personal data will be provided to you by electronic means of communication, unless otherwise requested by you.	Right to rectification - We take reasonable measures in order to ensure that the data which we hold about you are accurate, complete and up-to-date. In case <u>the personal data we hold are inaccurate, incomplete or outdated, we will modify, update or complete such personal data</u> on basis of your request.
Right to erasure - Under certain circumstances, you have the right to ask us to erase your personal data, for example, <u>if the personal data we have obtained about you, are no longer necessary to fulfil the original purpose of processing</u> or if you withdraw your consent to the personal data processing. We assess exercising your right to erasure (right to be forgotten) on the basis of individual circumstances of each particular case of processing. However, your right has to be assessed in the light of all relevant circumstances. For example, there may be certain circumstances or cases arising for us from applicable legislation when your personal data cannot be erased. In such case, we will not be able to accept your request.	Right to restriction of processing - You have also the right <u>to ask us not to process your personal data</u> . If you believe that the personal data we process about you are not accurate, that the processing is unlawful and you request the restriction of their processing, that we no longer need your personal data, but they are required by you as the Data subject for the exercise of legal claims or if you believe that we as the controller are not entitled to further process your personal data, we will not further process your personal data on the basis of your request.
Right to data portability - Under certain circumstances, <u>you have right to transmit the personal data</u> to another subject according to your choice. However, the right to portability applies only to personal data that we process under the contract to which you are one of the parties or on the basis of the consent which you have granted us.	Right to lodge a complaint or request - If you believe that we breach Personal data protection legislation when processing your personal data or that we have not handled your request in accordance with such legislation, you can lodge a complaint with the supervisory authority which is Úrad na ochranu osobných údajov SR , Hraničná 12, 820 07 Bratislava 27, Slovak republic, website: dataprotection.gov.sk , tel. No.: 02 3231 3214; e-mail: statny.dozor@pdp.gov.sk .
RIGHT TO OBJECT <u>You have the right to object to processing of your personal data</u> , for example if we process your personal data based on the legitimate interest or to processing in which profiling occurs. If you object to such personal	

data processing, we will not further process your personal data unless we demonstrate compelling legitimate grounds for such processing.

RIGHT TO WITHDRAW CONSENT

If we process your personal data on the basis of your consent, you have the right to withdraw such consent for further processing of your personal data. You may withdraw your consent at any time in writing, by e-mail or orally (in person).

You may exercise your rights specified in the table above at the contact addresses of the Controller listed at the beginning of this document. The Controller will provide you with the answer to the exercise of your rights free of charge.

In the event of a repeated, unreasonable or inappropriate request for the exercise of your rights, the Controller is entitled to charge a reasonable fee for the provision of information. The Controller will provide you with an answer within 1 month from the day when you exercised your rights. In certain cases, the Controller is entitled to extend this period, in the case of a high number and complexity of applications of the data subjects, maximally by 2 months. The Controller will always inform you about the extension of the deadline in advance.

9. VALIDITY

An updated version of this Privacy policy is valid and effective as of 21 March 2023. As it is possible that an update of the information on personal data processing contained in this Privacy policy may be necessary in the future, the Controller is entitled to update this Privacy policy at any time. In such case, the Controller will inform you about it in an adequate manner in advance.