

Personal Data Protection Policy in Slovenská elektrizačná prenosová sústava, a.s.

I.

Introductory Provisions

The commercial company, Slovenská elektrizačná prenosová sústava, a.s., with registered office at Mlynské nivy 59/A, 824 84 Bratislava, Comp. ID No.: 35 829 141, registered in the Commercial Register of the District Court Bratislava I, Section: Sa, Insert No.: 2906/B (hereinafter referred to as “**SEPS**” or “**controller**”), performs transmission of electricity on the entire territory of the Slovak Republic. It provides for transmission of electricity from power plants to the distribution system and to big customers connected to the 220 kV and 400 kV systems. Electricity import, export and transit as well as its precise metering is ensured through the transmission system lines and substations.

The mission of SEPS is to operate the transmission system reliably, to provide for the dispatch management of the system, its maintenance, upgrade, and development to ensure reliable and quality supply of electricity to all transmission system users as well as its parallel operation with the neighbouring transmission systems. Moreover, it takes care to respect transparent and non-discriminatory principles for access to the system with minimum environmental impact and it respects the requirements resulting from the national and European legislation, from regulatory decisions of the Regulatory Office for Network Industries and from the relevant rules of the operation and international cooperation of the transnational synchronously interconnected electricity system of the European Union.

SEPS processes various personal data of the data subjects for miscellaneous but precisely defined purposes within ensuring regular electricity transmission and performing business activity in compliance with the relevant legislation. Since protection of natural persons in regard to their personal data processing belongs among the fundamental rights, SEPS aims at protection of personal data of natural persons which it processes pursuant to the REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (EU) No. 2016/679 of 27 April 2016 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) and Act No. 18/2018 Coll. on Personal Data Protection and on amendment of certain acts.

In order to meet its information obligation as well as to provide the data subjects with further facts concerning processing of their personal data by SEPS, SEPS issues this document describing the personal data protection policy (hereinafter referred to as “**Privacy Policy**”). SEPS shall transparently publish the Privacy Policy on its website in a way so that the data subjects can have simple and permanent access.

II.

Basic Terms

The terms and abbreviations used in the text of this Privacy Policy have the meaning attributed to them below:

- **GDPR Regulation** of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 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);
- **Personal Data Protection Act** is Act No. 18/2018 Coll. On Personal Data Protection and on amendment of certain acts;
- **Personal Data Protection Legislation** includes the GDPR Regulation and the Personal Data Protection Act;

- **SEPS** is the commercial company, Slovenská elektrizačná prenosová sústava, a.s., with registered office at Mlynské nivy 59/A, 824 84 Bratislava, Comp. ID No.: 35 829 141, registered in the Commercial Register of the District Court Bratislava I, Section: Sa, Insert No.: 2906/B;
- **Personal data** are any information on identified or identifiable natural person (hereinafter referred to as “**data subject**”); identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **Controller** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law. For the purposes of this Privacy Policy, SEPS deems the controller to be a controller if it processes personal data pursuant to the previous sentence;
- **Processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller;
- **Recipient** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients;
- **Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **Restriction of processing** means the marking of stored personal data with the aim of limiting their processing in the future;
- **Profiling** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;
- **Pseudonymisation** means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;
- **Filing system** means any structured set of personal data which are accessible according to specific criteria, whether 2centralised, decentralised,2 or dispersed on a functional or geographical basis;
- **Consent of the data subject** means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- **Personal data breach** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- **Third country** is a country which is not a member state of the European Union or a party to the Agreement on the European Economic Area;
- **Personal Data Protection Methodist** is a SEPS employee appointed for performance of supervision over the personal data protection in the given filing system of personal data;
- **Top Responsible Person** (hereinafter referred to as “**Data Protection Officer**” or “**DPO**”) is a SEPS employee or a person fulfilling the tasks under the Service Contract concluded with SEPS. DPO supervises compliance of the SEPS personal data and the Personal Data Protection Legislation and he or she fulfils further tasks defined by this legislation;

- **Supervisory Authority** is an independent public authority established pursuant to Article 51 of the GDPR Regulation; the Office for Personal Data Protection of the Slovak Republic is deemed the supervisory authority in the Slovak Republic.

III.

Security of Processing

In order to protect the rights and freedoms of natural person, SEPS has taken appropriate technical and organisational measures at personal data processing to provide for fulfilment of the Personal Data Protection Legislation requirements. SEPS deems security of personal data processing to be a priority and makes permanent efforts to prevent security incidents which could lead to the risk for rights and freedoms of natural persons. Security of processing is subject to regular assessment with regard to the latest knowledge and character of personal data processing.

Moreover, the interest in personal data processing of the data subjects is proved by obtaining several certificates based on fulfilment of all security requirements of the ISO/IEC 27001 standard – Information Security Management System. With regard to the aforementioned we take the liberty to emphasize that all personal data obtained from the data subject are processed with high level of the organisational and technological security. SEPS shall regularly assess and, if possible, apply appropriate guarantees for personal data security which may include encrypting or pseudonymisation.

Compliance of personal data processing by SEPS and the GDPR Regulation as well as other Union legislation, Personal Data Protection Act and the SEPS Rules is monitored by the Personal Data Protection Methodists and Data Protection Officer (DPO).

DPO contact data are: ochranaOU@sepsas.sk, Tel. No.: +421 2 5069 2349.

IV.

Principles of Processing

SEPS shall thoroughly respect the principles of data subject personal data processing and their privacy while it takes care that personal data must be especially:

- a) processed in a lawful, fair and transparent manner;
- b) obtained for particularly determined, expressly stated and legitimate purposes;
- c) appropriate, relevant and limited to the scope which is inevitable to achieve the relevant purpose of processing;
- d) correct, and updated, if necessary;
- e) stored in the form which enables identification of data subjects maximum to the time when it is necessary for the purposes for which personal data are processed;
- f) processed in a manner which ensures appropriate security of personal data including protection against unauthorized or illegal processing and accidental loss, destruction or damage through appropriate technical of organisational measures.

SEPS receives personal data directly from the data subject. Personal data which SEPS did not obtain from the data subject were obtained from other person than the data subject (e.g. from a family member) or from publicly accessible sources and information (such as Cadastral Portal, Commercial Register of the Slovak Republic etc.).

During its business activities, SEPS cooperates with several processors who process personal data on behalf of SEPS at performance of their activities under the relevant contract. SEPS uses solely the processors who declared they adopted appropriate technical and organisational measures so as processing can meet the Personal Data Protection Legislation requirements and can provide for protection of rights of the data subject. Processing by

a processor shall be governed by a special contract which binds the processor against the controller and contains the requirements pursuant to the GDPR Regulation.

In case of transmission of the data subject personal data into a third country or an international organisation, SEPS binds the data subject to inform on existence or non-existence of the adequacy decision by the European Commission in advance. In case of existence of the adequacy decision by the European Commission, SEPS undertakes to carry out the data subject personal data transmission into a third country or an international organisation only in case of existence of the appropriate safeguards pursuant to Articles 46 and 47 of the GDPR Regulation, or in case of existence of derogations for specific situations pursuant to Article 49 of the GDPR Regulation. SEPS undertakes to inform the data subject on the existence of appropriate safeguards or existence of derogations for specific situations in advance.

In case of personal data breach which will probably result in high risk for the rights and freedoms of natural persons, SEPS will communicate the personal data breach to the data subject without undue delay, unless some of the conditions for withdrawal from the notification obligation is fulfilled.

V.

Purposes of Personal Data Processing in SEPS and Legal Bases for Processing

It is in the interest of SEPS to process personal data of data subjects only for a particular and current purpose. Primarily, SEPS processes personal data since it is necessary to fulfil its legal obligation as a controller or to fulfil the contract the data subject is a party to. Moreover, SEPS processes certain personal data of data subjects since this processing is inevitable for the purposes of legitimate interests followed by SEPS as the controller. The consent of data subjects with personal data processing is required by SEPS in adequate cases if the character of processing requires so. Currently, SEPS does not carry out automated decision-making including profiling, unless expressly provided otherwise in the particular case below.

SEPS processes personal data to achieve the purposes described below and under the legal bases below:

A) Filing system of personal data “Registration of Entries”

The purpose of personal data processing is a controlled movement of persons in the SEPS premises within which permit to enter for foreign persons into the SEPS premises, permits for a single entry for an external person into the SEPS premises, special permits for natural persons, permits for entry of a road vehicle, permits for a single entry of a road vehicle are issued and registered.

The legal basis for processing is a legitimate interest of SEPS as a controller through which it focuses on the controlled movement of persons in the SEPS premises, safety of its employees and protection of its property. The data subject shall be obliged to provide his or her personal data, otherwise he or she shall not be allowed the controlled entry to the SEPS premises.

The personal data of the data subject may be provided to the following recipients: members of the private security service providing for the SEPS property protection, courts, law enforcement authorities, entities ensuring administration and support of information technologies, lawyers providing SEPS with legal services.

SEPS does not intend to transmit personal data of data subjects into a third country or an international organisation.

B) Filing system of personal data “Camera System Monitoring the Premises Accessible to the Public”

The purpose of personal data processing is monitoring of the SEPS area and premises accessible to the public in order to protect the SEPS property, health and property of persons present in the monitored premises, financial interests of SEPS, protection of rights and interests protected by laws of SEPS or the third party.

The legal basis for processing is a legitimate interest of SEPS as a controller through which it focuses especially on safety of its employees and protection of its property.

The personal data of the data subject may be provided to the following recipients: members of the private security service providing for the SEPS property protection, courts, law enforcement authorities, entities ensuring administration and support of information technologies, lawyers providing SEPS with legal services.

SEPS does not intend to transmit personal data of data subjects into a third country or an international organisation.

C) Filing system of personal data “Registration of the Delivered and Sent Mail”

The purpose of personal data processing is keeping registration of the delivered and sent mail.

The legal basis for processing is a legitimate interest of SEPS as a controller through which it focuses on the primary and general registration of mail in order to keep its transparent list provided the minimization principles are respected. The data subject shall be obliged to provide his or her personal data, otherwise no full mail communication and its registration can occur.

Personal data of the data subject are not provided to recipients.

SEPS does not intend to transmit personal data of data subjects into a third country or an international organisation.

D) Filing system of personal data “Contractual Relations”

The purpose of personal data processing is conclusion and fulfilment of contractual relations including performance of measures prior to the contract conclusion based on the request of the data subject while within the respective filing system (I.) processing of personal data of a natural person as one of the parties occurs; (II.) preparation of contractual relations occurs, for example, contracts on real estate transfer, lease agreements, purchase contracts, insurance policies, preparation of contracts within the supplier – customer relations etc.; (III.) keeping registration of the concluded and terminated contractual relations with the third entities which are deemed to be a data subject occurs.

The legal basis for processing is performance of the contract to which the data subject is a party along with fulfilment of a legal obligation of SEPS pursuant to Act No. 513/1991 Coll. Commercial Code as amended (hereinafter referred to as “**Commercial Code**”), Act No. 40/1964 Coll. Civil Code as amended, Act No. 251/2012 Coll. on Power Engineering and on amendment of certain acts or other related legislation. Provision of personal data of the data subject is a legal or contractual requirement and in case of failure to provide them SEPS cannot fulfil its legal obligations resulting from the relevant legislation or the respective contractual relation is not established.

Personal data of the data subject may be provided to the following recipients: Ministry of Economy of the Slovak Republic, Regulatory Office for Network Industries, Public Procurement Office, Financial Administration authorities, lawyers providing SEPS with legal services, tax and accounting advisors, District Office, cadastral section, Slovak Trade Inspection, Central Register of Contracts, banks, etc.

SEPS does not intend to transmit personal data of data subjects into a third country or an international organisation.

E) Filing system of personal data “Public Procurement”

The purpose of the personal data processing is awarding contracts, civil works execution or rendering of services and ensuring other related activities.

The legal basis for processing is fulfilment of legal obligations of SEPS pursuant to Act No. 343/2015 Coll. on Public Procurement and on amendment of certain acts as amended (hereinafter referred to as “**Public Procurement Act**”), Commercial Code, Act No. 40/1964 Coll. Civil Code as amended or other related legislation. Provision of personal data of the data subject is a legal requirement and in case of the failure to provide them, SEPS cannot fulfil its legal obligations under the Public Procurement Act or other related legislation.

Personal data of the data subject may be provided to the following recipients: Public Procurement Office, courts, law enforcement authorities, lawyers providing legal services to SEPS, members of the selection committee and other authorized entities.

SEPS does not intend to transmit personal data of data subjects into a third country or an international organisation.

F) Filing system of personal data “Registration of the Board of Directors Members and the Supervisory Board Members”

The purpose of personal data processing is keeping the agenda of the SEPS bodies which mean the SEPS Board of Directors and the SEPS Supervisory Board.

Legal basis of processing is performance of the contract the data subject is a party to as well as fulfilment of legal obligations of SEPS pursuant to the Commercial Code or other related legislation. Provision of personal data of the data subject is a legal or contractual requirement and in case of the failure to provide them, SEPS cannot fulfil its legal obligations resulting from the respective generally binding legal regulations or no contractual relation is established.

Personal data of the data subject may be provided to the following recipients: Commercial Register of the Slovak Republic, Ministry of Economy of the Slovak Republic, Regulatory Office for Network Industries, lawyers providing SEPS with legal services.

Personal data of the SEPS body members within the scope of the title, name, surname and function may be published on the Intranet, in publications, on social networks and on the SEPS website.

SEPS does not intend to transmit personal data of data subjects into a third country or an international organisation.

G) Filing system of personal data “Registration of Complaints”

The purpose of the personal data is the receipt, registration, investigation and communication of results of the complaints investigation or control of complaints of data subjects.

The legal basis for processing is fulfilment of legal obligations of SEPS pursuant to Act No. 9/2010 Coll. on Complaints as amended and Act No. 85/1990 Coll. on Petition Law as amended. Provision of personal data of the data subject is a legal requirement and in case of the failure to provide them, the complaint cannot be pursued and SEPS shall be obliged to postpone it or further obligations pursuant to the relevant legislation cannot be fulfilled.

Personal data of the data subject may be provided to the following recipients: public administration authorities and other persons within the provided collaboration.

SEPS does not intend to transmit personal data of data subjects into a third country or an international organisation.

H) Filing system of personal data “Registration of Accommodated Guests”

The purpose of personal data processing is registration of the accommodated guests pursuant to Act No. 253/1998 Coll. on Residency Declarations of Citizens of the Slovak Republic and the Register of Residents of the Slovak Republic as amended (hereinafter referred to as “**Act on Citizen Residency Declaration**”) in the Book of Accommodated Guests who may also be foreign nationals.

Legal basis of processing is fulfilment of legal obligations of SEPS pursuant to the Act on Citizen Residency Declaration and the related legislation. Provision of personal data of the data subject is a legal requirement and in case of the failure to provide them, SEPS cannot fulfil its legal obligations under the Act on Citizen Residency Declaration.

Personal data of the data subject may be provided to the following recipients: relevant Police Force unit, state authorities that within the scope defined by the special regulations fulfil the tasks in the constitutional arrangement section, internal order and state security or state defence, lawyers providing SEPS with legal services.

SEPS does not intend to transmit personal data of data subjects into a third country or an international organisation.

I) Filing system of personal data “Registration of Requests Under the Information Freedom Act”

The purpose of personal data processing is handling the requests for making available the information based on Act No. 211/2000 Coll. on Free Access to Information and on amendment of certain acts (Freedom of Information Act) as amended and their registration.

The legal basis for processing is fulfilment of legal obligations of SEPS pursuant to Act No. 211/2000 Coll. on Free Access to Information and on amendment of certain acts (Freedom of Information Act) as amended. Provision of personal data of the data subject is a legal requirement and in case of the failure to

provide them, the requested information cannot be made available to the applicant and SEPS will postpone the request.

The personal data of the data subject may be provided to the following recipients: courts, law enforcement authorities, lawyers providing SEPS with legal services.

SEPS does not intend to transmit personal data of data subjects into a third country or an international organisation.

J) Filing system of personal data "Database of Job Seekers"

The purpose of personal data processing is:

- keeping the database of job seekers who sent their CVs, letter of motivation, job application or other similar documentation to SEPS on a voluntary basis without responding to a particular tender or to the published advertisement promoting vacant posts. The received CVs, letters of motivation, job applications or other similar documentation shall be kept by SEPS in the established database of job seekers during the validity period of the consent of the data subject and if filling of a vacant post is necessary, SEPS shall contact the selected job seekers from the respective database.

The legal basis for personal data processing is a free consent of the data subject with personal data processing which may be withdrawn by the data subject at any time. The provision of data subject's personal data is voluntary for the purpose of administration of "Database of Job Seekers" and the failure to provide them will not be punished by SEPS in any way.

- keeping the database of job seekers who showed interest in a particular post offered by SEPS. The data subject shall be obliged to provide his or her personal data since it is inevitable to perform measures prior to the contract conclusion based on the request of the data subject, otherwise the data subject cannot participate in the tender. If the data subject showed interest in a particular post, however, no employment relation was established and, subsequently, the data subject failed to provide the consent with personal data processing for its further registration in the SEPS database of job seekers, his or her personal data will be erased.

The legal basis for personal data processing is a free consent of the data subject with personal data processing which may be withdrawn by the data subject at any time, and at the same time the fulfilment of the legal obligations of SEPS pursuant to §13 para. 1 letter a) of the Personal Data Protection Act. The provision of data subject's personal data is necessary for the purpose of administration of "Database of Job Seekers" and in case of failure to provide them, SEPS cannot fulfil its legal obligations under relevant legal regulations, for instance verifying the job applicant's identity and their qualifications for filling the job position.

The personal data of the data subject may be provided to the following recipients: courts, law enforcement authorities, lawyers providing SEPS with legal services, Labour Inspectorate.

SEPS does not intend to transmit personal data of data subjects into a third country or an international organisation.

K) Filing system of personal data "Economic - Accounting"

The purpose of personal data processing is processing of accounting documents, i.e. processing of accounting data and reporting, provision of accounting information, methodology and standards in the field of accountancy and taxes.

The legal basis for processing is fulfilment of legal obligations of SEPS pursuant to Act No. 431/2002 Coll. on Accountancy as amended, Act No. 595/2003 Coll. on Income Tax as amended, Act No. 563/2009 Coll. on Tax Administration (Tax Procedure Code) as amended or other related legislation. Provision of personal data of the data subject is a legal requirement and in case of the failure to provide them, SEPS cannot fulfil its legal obligations under the Accountancy Act and other relevant legal regulations.

The personal data of the data subject may be provided to the following recipients: accounting and tax advisors, authorities of the Financial Administration of the Slovak Republic, courts, law enforcement authorities, lawyers providing SEPS with legal services, auditors, banks, Central Register of Contracts.

SEPS does not intend to transmit personal data of data subjects into a third country or an international organisation.

L) Filing system of personal data “Recovery of Debts”

The purpose of personal data processing is keeping registration and recovery of debts which consists in effective recovery of the SEPS debts and ensuring duly protection of rights and interests protected by law of SEPS or of the third parties.

The legal basis for processing are legitimate interests of the controller through which it focuses on proving, exercising or defending its legal claims.

Personal data of the data subject may be provided to the following recipients: lawyers providing SEPS with legal services, accounting and tax advisors, auditors, law enforcement authorities, courts.

SEPS does not intend to transmit personal data of data subjects into a third country or an international organisation.

M) Filing system of personal data “Litigations and Other Legal Proceedings”

The purpose of personal data processing is keeping the registration and pursuing litigations and other legal proceedings through which SEPS especially proves, exercises or defends its legal claims.

The legal basis for processing are legitimate interests of SEPS as the controller through which it focuses on proving, exercising or defending its legal claims.

Personal data of the data subject may be provided to the following recipients: lawyers providing SEPS with legal services, courts, law enforcement authorities, executors, auditors.

SEPS does not intend to transmit personal data of data subjects into a third country or an international organisation.

N) Filing system of personal data “Working Meetings with Electricity and Gas Producers and Suppliers”

The purpose of personal data processing is keeping registration of the documentation and minutes from meetings of attendees of the working meetings of electricity and gas producers and suppliers which are, subsequently, investigated and evaluated by the SEPS Board of Directors.

Legal basis of processing is performance of the contract of which the data subject is a party or SEPS legitimate interests as the controller through which it focuses on registration of the documentation and minutes from the meetings as well as leading efficient negotiations. Provision of personal data of the data subject is a contractual requirement and in case of the failure to provide them to SEPS, no relevant contractual relation is established or no measured are performed prior to the contract conclusion. The data subject shall be obliged to provide its personal data while in case of failure to provide personal data, SEPS is unable to lead efficient negotiations with the respective electricity and gas producers and suppliers, nor to keep the documentation and minutes from the meeting.

Personal data of the data subject may be provided to the following recipients: lawyers providing SEPS with legal services, accounting and tax advisors, auditors, courts and law enforcement authorities.

SEPS does not intend to transmit personal data of data subjects into a third country or an international organisation.

O) Filing system of personal data “Infoline”

The purpose of personal data processing is handling demands and inquiries of the data subject addressed to SEPS.

The legal basis for processing is a free consent of the data subject with personal data processing which may be withdrawn by the data subject at any time or contract fulfilment to which the data subject is a party. Provision of personal data is voluntary and the failure to provide them will not be punished by SEPS in any way or if the legal basis is performance of the contract, the data subject shall be obliged to provide his or her personal data, otherwise his or her demand cannot be duly handled.

Personal data of the data subject are not provided to recipients.

SEPS does not intend to transmit personal data of data subjects into a third country or an international organisation.

P) Filing system of personal data “Statutory Bodies, Proxies and Employees of Suppliers and Customers”

The purpose of personal data processing is keeping registration of members of the statutory bodies, representatives and employees of suppliers and customers or the persons appointed or authorized by them or other similar entities in order to lead efficient communication with the other party.

The legal basis for processing includes legitimate interests of SEPS as the controller through which it focuses on efficient communication with the other party. The data subject shall be obliged to provide his or her personal data or pursuant to the provision of Art. 78 par. 3 of the General Data Protection Regulation he or she shall tolerate provision of his or her personal data while in case of failure to provide personal data, SEPS is unable to efficiently communicate with the other party.

The personal data of the data subject may be provided to the following recipients: lawyers providing SEPS with legal services.

SEPS does not intend to transmit personal data of data subjects into a third country or an international organisation.

Q) Filing system of personal data “Whistleblowing”

The purpose of personal data processing is handling the suggestions delivered to SEPS in regard to communication of anti-social activity, keeping their registration and execution of the related measures. The legal basis for processing is fulfilment of legal obligation of SEPS pursuant to Act No. 307/2014 Coll. on Certain Measures Related to Reporting on Anti-Social Activities and on amendments of certain laws as amended. Provision of personal data of the data subject is a legal requirement and in case of the failure to provide them, SEPS cannot fulfil its legal obligations under the relevant legislation.

The personal data of the data subject may be provided to the following recipients: court, law enforcement authorities, state administration and public power authorities for performance of control and supervision (e.g. Labour Inspectorate), Ministry of Justice of the Slovak Republic, lawyers providing SEPS with legal services.

SEPS does not intend to transmit personal data of data subjects into a third country or an international organisation.

R) Filing system of personal data “Anti-Money-Laundering”

The purpose of personal data processing is execution of measures regarding protection against money-laundering and protection against terrorist financing.

The legal basis for processing is fulfilment of legal obligation of SEPS pursuant to Act No. 297/2008 Coll. on Protection Against Money Laundering and Terrorist Financing and on amendment to certain acts as amended or other related legislation. Provision of personal data of the data subject is a legal requirement and in case of the failure to provide them, SEPS cannot fulfil its legal obligations under the relevant legislation.

Personal data of the data subject may be provided to the following recipients: law enforcement authorities, courts, lawyers providing SEPS with legal services, etc.

SEPS does not intend to transmit personal data of data subjects into a third country or an international organisation.

S) Filing system of personal data “Administration of Registry”

The purpose of personal data processing is duly management and administration of the Registry. The legal basis for processing is fulfilment of legal obligation of SEPS pursuant to Act No. 395/2002 Coll. on Archives and Registries and on amendment to certain acts as amended or other related legislation. Provision of personal data of the data subject is a legal requirement and in case of the failure to provide them, SEPS cannot fulfil its legal obligations under the relevant legislation.

Personal data of the data subject may be provided to the following recipients: Ministry of Interior of the Slovak Republic and other state administration authorities in the section of archives and registries, courts and law enforcement authorities, lawyers providing SEPS with legal services.

SEPS does not intend to transmit personal data of data subjects into a third country or an international organisation.

T) Filing system of personal data “Statistical Purposes”

The purpose of personal data processing is keeping databases of statistics on certain personal data of data subjects while using appropriate and effective technical and organisational measures, especially to ensure respecting the principle of data minimization and pseudonymisation.

The legal basis for processing is Article 89 of the GDPR Regulation.

Personal data of the data subject are not provided to recipients.

SEPS does not intend to transmit personal data of data subjects into a third country or an international organisation.

VI.

Processed Personal Data

SEPS processes only the personal data which it inevitably needs mainly to carry out its business activity, to fulfil its legal and contractual obligations and to protect its legitimate interests.

SEPS takes care so that the data subject can process only the scope of personal data inevitable to fulfil the purpose of relevant processing. This principle of processing minimisation is also applied in relation to personal data provided to SEPS based on the consent of the data subject. If SEPS monitors position of the data subjects, it shall notify the data subject of it in an appropriate manner.

VII.

Period of Personal Data Storage

SEPS keeps personal data of data subjects during variously long period which depends on the reason and purpose of processing. In general, SEPS processes personal data:

- during the period required by the generally binding legal regulation if it processes personal data due to fulfilment of its legal obligations;
- during the validity period of the contractual relation established by the contract or duration of precontract relations if it processes personal data due to contract performance;
- during the period of legitimate interest on which SEPS focuses, if personal data processing is inevitable for this purpose;
- during the period expressly stated in the consent or until it is withdrawn if it processes personal data based on the consent.

In order to ensure not storing personal data for longer period than is inevitable, SEPS shall define periods for erasure or regular investigation of personal data. Personal data can be processed solely during the period when the purpose of their processing applies. Then the personal data are being liquidated in compliance with the relevant SEPS internal regulations and documents.

Particular storage periods of individual data are provided in the relevant SEPS internal regulations and documents (e.g. SEPS Rules of Records Retention).

At any time, the data subject may address the request for the information to SEPS (or DPO) for how long his or her personal data will be stored.

After elapsing of the respective aforementioned period, SEPS shall be authorized to process personal data of the data subject only for compatible or special purposes such as archiving or statistics.

VIII. Rights of Data Subjects

SEPS deems important so that every data subject can control his personal data and so that personal data can be processed legally. It is in the SEPS interest to allow data subjects to exercise their rights in relation to personal data protection. If the data subject intends to exercise any of his rights, he or she can do so electronically to the e-mail address: ochranaOU@sepsas.sk, by post mail by sending a written inquiry addressed to “the hands of a responsible person DPO” to the address: Slovenská elektrizačná prenosová sústava, a.s., Mlynské nivy 59/A, 824 84 Bratislava, by phone at the telephone number: +421 2 5069 2349, or also in person at the SEPS registered office with a request for meeting a responsible person.

The data subject shall have the right to ask SEPS for access to the personal data pertaining to him or her. The data subject shall have the right to rectification, erasure or restriction of personal data processing along with the right to object to personal data processing and the right to their portability. Furthermore, the data subject shall have the right to withdraw the consent with personal data processing and the right to lodge a complaint to the supervisory authority.

A) Right to access

The data subject shall have the right to obtain confirmation from SEPS whether his or her personal data are processed and if they are processed, he or she shall have the right to obtain access to these personal data. Moreover, the data subject shall have the right to obtain a copy of the processed personal data and additional information resulting from Article 15 of the GDPR Regulation such as for example: purposes of processing, categories of personal data concerned, personal data storage period, etc.

B) Right to rectification

It is in the SEPS interest to process solely current personal data on the data subject, thus we ask the data subjects to actively use their right to supplement incomplete personal data and to rectify incorrect personal data.

C) Right to erasure

The data subject shall have the right to achieve so that SEPS can, without undue delay, erase personal data which relate to him or her if any of the reasons in Article 17 of the GDPR Regulation is fulfilled. The reason of erasure may be, for example, if the data subject withdraws the consent with processing, if personal data are not already necessary for the purposes for which they were obtained or were otherwise processed or if the data subject objects to processing, etc.

D) Right to restrict processing

The data subject shall have the right to achieve so that SEPS can restrict personal data processing if any of the cases in Article 18 of the GDPR Regulation occurs. Restriction will occur, for example, if the data subject challenges correctness of personal data (during the period allowing SEPS to verify correctness of personal data) or if processing is illegal and the data subject objects to erasure of personal data and requests restriction of their use instead.

E) Right to data portability

If personal data processing is performed using automated means and the legal basis for personal data processing is the consent of the data subject or the contract fulfilment, the data subject shall have the right to obtain the related personal data and which were provided to SEPS, in the structured, commonly used and machine-readable format and he or she shall have the right to transmit these data to another controller. In case of interest of the data subject and if technically feasible, SEPS will transmit the relevant personal data directly to another controller.

F) Right to object and automated individual decision-making

The data subject shall have the right to any time object due to the reasons concerning his or her particular situation to personal data processing pertaining to him or her which is performed for the purposes of legitimate interests the controller follows including objections to the related potential profiling. SEPS may

not further process personal data, unless it shows inevitable legitimate reasons for processing which prevail over the interests, rights and freedoms of the data subject or reasons to prove, exercise or defend legal claims.

The data subject shall have the right not to be subject to the SEPS decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her. Currently, SEPS does not carry out automated decision-making including profiling.

G) Right to lodge a complaint

If the data subject has suspicion SEPS processes personal data illegally, it shall be entitled to lodge a complaint with the supervisory authority. The supervisory authority for the territory of the Slovak Republic is the Regulatory Office for Network Industries of the Slovak Republic, with registered office at: Budova Park One, Námestie 1. mája 18, 811 06 Bratislava, Slovenská republika, tel.: +421 2 3231 3214, web: www.dataprotection.gov.sk, e-mail: statny.dozor@pdp.gov.sk.

H) Right to withdraw consent

If it is personal data processing for which the consent of the data subject is required pursuant to the Personal Data Protection Legislation, for the relevant purpose of personal data processing SEPS requires the data subject to provide the consent with personal data processing which is a clear affirmative act establishing a freely given, specific, informed and unambiguous indication of the data subject's agreement to the processing of personal data relating to him or her. If the data subject provided the consent with processing of his or her personal data for a particular purpose, he or she shall have the right to withdraw his or her consent without affecting the lawfulness of processing based on the consent before its withdrawal.

SEPS shall without undue delay provide the data subject with the information on measures adopted based on the request of the data subject pursuant to this Article not later than one month from the request delivery. The mentioned period may be extended by further two months, if necessary. SEPS shall inform the data subject on each such extension within one month from delivery of the request including the reasons for missing the time limit. If the data subject lodged a complaint via electronic means, the information, if possible, shall be provided using electronic means, unless otherwise requested by the data subject.

If SEPS fails to take measures based on the request made by the data subject, it shall inform the data subject immediately and not later than one month from the request delivery on the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

All measures taken pursuant to Articles 15 to 22 and Article 34 of the GDPR Regulation shall be provided free of charge.

IX.

Final Provisions

In case of any inquiries related to personal data protection, the data subjects are kindly asked to contact the Top Responsible Person (DPO) in a form the most appropriate for the data subject.

SEPS shall be entitled to change the Privacy Policy, especially for the purpose of inclusion of the legislative changes, update of purposes and processing means, etc. Due to potential change of this Privacy Policy, SEPS shall not restrict the rights of the data subject resulting from the Personal Data Protection Legislation. If the Privacy Policy is modified, it will be notified to the data subjects by SEPS in an appropriate manner.