
The Directive on the processing of personal data

drawn up in accordance with the Regulation (EU) No. 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 repealing Directive 95/46/EC (General Data Protection Regulation)

cargo-partner SR, s.r.o.

registered office: Kopčianska 92, 852 03 Bratislava

Identification number: 31 358 152

Registered in the Commercial Register of the District Court Bratislava I, section. Sro, Inset No.: 5741/B

Preamble

- (1) The processing of personal data is a necessary part of the performance of business activities. Compliance of processing operations with legislation, in particular, with the Regulation (EU) No. 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 repealing Directive 95/46/EC (hereinafter referred to as "**GDPR**"), Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments to Certain Laws (hereinafter referred to as the "**Act**"); as well as with other relevant legislation is the primary duty of the information system controllers and processors.

- (2) **cargo-partner SR, s.r.o.**, registered office: Kopčianska 92, 852 03 Bratislava, Identification number: 31 358 152, registered in the Commercial Register of the District Court Bratislava I, Section Sro, Inset No.: 5741/B, (hereinafter referred to as the "**Company**"),
 - a. appreciates the trust of its employees, customers, suppliers and any other persons whose personal data it processes,
 - b. recognizes the importance of protecting the personal data it processes, and
 - c. takes steps, on an ongoing basis, that are necessary and purposeful to ensure compliance with the legislation and updates them as necessary.

- (3) For these reasons, the Company has adopted this Internal Directive on Personal Data Protection (the "**Directive**"), drawn up in accordance with the provisions of the GDPR, which regulates the processing of personal data within the Company and determines the rights and obligations of the persons involved in the processing, i.e. the data subjects and the persons authorized to handle personal data on behalf of the Company.

In view of the above, the Company has adopted this Internal Directive, as set out below:

1. **Scope and Application of the Directive**

- 1.1 This Directive applies to the transactions concerning the processing of personal data carried out by the Company as of May 25, 2018.
- 1.2 This Directive shall not apply to such processing of personal data that is not covered by the GDPR and the Act.
- 1.3 GDPR is a general European Union regulation in the area of personal data protection. The Company's business activities and the related processing of personal data are also covered by other laws, e.g. the Act, Act No. 311/2001 Coll. - Labour Code, Act No. 124/2006 Coll. on Occupational Safety and Health Protection, Act No. 431/2002 Coll. on Accounting, Act No. 351/2011 Coll. on Electronic Communications, etc.

1.4 The terms used in this Directive have the same meaning as the same terms defined in Art. 4 of GDPR.

2. Position of the Company in the processing of personal data

2.1 When processing personal data, the Company has the status of the controller, within the meaning of Article 4 (7) of the GDPR.

2.2 The Company shall not be a controller if it obtains personal data in a random manner without prior identification of the purposes and means of processing, in which case the GDPR shall not apply. These may include situations where the Company was provided with personal data by mistake or was provided with personal data that it had not requested and is not interested in further processing of this personal data for any purpose. Keeping this data, for example, in order to return them to the authorized person or to erase them within reasonable time, does not constitute the processing of personal data falling within the scope of the GDPR.

2.3 The company is a member of an international group of companies called cargo-partner where the personal data may be shared or processed together with other entities within a group of companies. The Company shall provide transparent information to the data subjects regarding the legitimate interests of the processing¹, recipients or categories of recipients of personal data or third countries to which the personal data should be transferred.²

3 Purpose of the personal data processing

3.1 The list below represents the categories of processing purposes which take place during the Company's business activity.

3.1.1 Selection procedures and new job applicants;

3.1.2 Database of existing job applicants;

3.1.3 Wages;

3.1.4 Keeping of attendance records;

3.1.5 Business phone book;

3.1.6 Business trips;

3.1.7 Bookkeeping;

3.1.8 Contract agenda;

3.1.9 Database of existing clients, potential clients;

3.1.10 Database of suppliers, potential suppliers;

3.1.11 Camera system;

¹ Recital 48 GDPR: "Controllers that are part of a group of undertakings or institutions affiliated to a central body may have a legitimate interest in transmitting personal data within the group of undertakings for internal administrative purposes, including the processing of clients' or employees' personal data. The general principles for the transfer of personal data, within a group of undertakings, to an undertaking located in a third country remain unaffected."

² Article 13 (1) d), e) and f) of the GDPR.

- 3.1.12 Litigation and recovery of claims;
- 3.1.13 Sent and received mail;
- 3.1.14 Archive;
- 3.1.15 Marketing;
- 3.1.16 Teambuilding of employees;
- 3.1.17 Recipients of shipments;

4 Basic principles of processing personal data

- 4.1 GDPR regulates the basic principles of personal data processing in Article 5 of GDPR. The company ensures, on an ongoing basis, that all processing operations be carried out in accordance with all the principles set out below.

Lawfulness, justice and transparency

- 4.2 The company processes the personal data of the data subjects in a legitimate, fair and transparent manner.
 - 4.2.1 Legitimate processing means that the processing of personal data is based on one of the legal bases of processing specified in Articles 6 to 11 and 89 of the GDPR.
 - 4.2.2 Fairness and transparency means that the Company provides clear and comprehensible information to the data subjects, whose personal data it processes, about the processing conditions and the rights they have in this respect. In addition to instruction about their rights, the data subjects are informed of the particulars of the processing as stipulated by law, including the purposes for which the data are processed and on what legal basis. The scope of the information to be provided is regulated in Article 13 and 14 of the GDPR and information provided at the request of the data subject is regulated in Article 15 of the GDPR. It follows from these provisions that the right of the data subjects to be provided with the information is not absolute and in some cases the Company is not obliged to expressly inform the data subjects.

Restriction of purpose

- 4.3 The Company collects the personal data for specified, explicit and legitimate purposes and these may not be further processed in a way that is incompatible with those purposes. Further processing for a purpose other than that for which the personal data was obtained is permitted under certain conditions, that means, even if the Company obtains personal data for a particular purpose, upon meeting certain conditions it may also process the data for other than the original purpose ("Compatibility test").

- 4.4 Further data processing for archiving purposes in the public interest, for purposes of scientific or historical research or statistical purposes is considered to be compatible with the original purpose pursuant to the GDPR. For this purpose, the Company shall provide appropriate safeguards regarding the rights and freedoms of the data subject.

Data minimisation

- 4.5 Personal data which the Company processes is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. For this purpose, before the entry into force of GDPR, the Company had completed an audit of the processing of personal data and it has also been monitoring the processing operations on an ongoing basis. The Company provides monitoring on an ongoing basis in order to be able to demonstrate that it needs all the personal data being processed in order to achieve the intended purposes of processing.

Principle of correctness

- 4.6 The Company makes reasonable efforts to ensure that the personal data processed by the Company are accurate and updated as necessary. The Company shall ensure on an ongoing basis that the incorrect personal data are erased or corrected without delay. The data subjects are required, under any circumstances, to provide the Company with correct personal data and effectively update them on an ongoing basis (e.g. in writing, including via e-mail) with the Company if, for example, these data are changed.
- 4.7 The Company shall assume that the personal data provided by the persons concerned is true, up-to-date, complete and correct, until the moment of change being notified by the data subjects, in which case the Company shall change, modify or correct the relevant personal data without delay.

Minimisation of storage

- 4.8 The Company shall keep the personal data in a form that permits the identification of the data subjects; as long as it is necessary for the purposes for which the personal data are processed. If personal data are processed for multiple purposes, the Company is authorized to process them until at least one piece of personal data will have remained in effect. Personal data may be retained for longer if they are processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes. In such a case, the Company shall ensure that appropriate technical and organizational safeguards are adopted to protect the rights and freedoms of the data subjects.
- 4.9 Retention periods (i.e. storage periods) may, in some cases, result from specific regulations. However, some specific regulations only provide for a minimum legal storage

period, and the storage periods may be longer in given cases. The minimization policy of storage allows to continue the processing of personal data after expiration of storage periods to continue for some other specified purposes. These include the archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, as set forth in Article 89 of GDPR.

Integrity and confidentiality

- 4.10 The Company shall ensure that the personal data be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ("safety measures").
- 4.11 This principle is complemented by other obligations concerning the security of personal data which the GDPR deals with in Section 2 of Chapter IV, namely in the Articles 32 to 34 of the GDPR. The principle of integrity and confidentiality is explained in more detail in point 8 below.

Responsibility

- 4.12 The Company shall be responsible for the processing of personal data in accordance with the above principles while taking measures to demonstrate the compliance of each processing operation. For this purpose, for example, the Company shall prepare written evidence proving that all aspects of the Company's processing operations have been internally assessed, with the result that this assessment is compliant with the provisions of the GDPR. The obligation to demonstrate compliance exists solely with the relevant Office for Personal Data Protection.
- 4.13 In accordance with the principle of accountability, the Company can demonstrate compliance with the basic principles of processing personal data, e.g. in one of the following ways (if applied to the Company):
 - 4.13.1 by adopting and complying with this Directive;
 - 4.13.2 by concluding contracts with processors or joint controllers under Articles 26 or 28 of the GDPR;
 - 4.13.3 by keeping records of processing activities under Article 30 of the GDPR;
 - 4.13.4 by providing assistance to the relevant Office for Personal Data Protection in the performance of its tasks and powers under Article 31 of the GDPR;
 - 4.13.5 by adopting appropriate safeguards under Article 32 of the GDPR;
 - 4.13.6 by conducting an impact assessment and any prior consultation under Article 35 and 36 of the GDPR, if necessary;
 - 4.13.7 by training the employees in the field of personal data protection;

- 4.13.8 by appointing the Data Protection Officer under Articles 37 to 39 of the GDPR, if necessary;
 - 4.13.9 by complying with the rules and appropriate safeguards during the cross-border transfer of personal data to third countries or international organisations;
 - 4.13.10 by compliance with approved certification mechanisms and data protection seals and marks under Article 42 et seq. GDPR.
- 4.14 The Company makes reasonable efforts to ensure the protection of personal data through a specifically designed ("*data protection by design*") and standard ("*data protection by default*") protection of personal data.
- 4.14.1 Specifically designed protection of personal data means that the Company, taking into account various aspects of processing (e.g. latest knowledge, nature, scope and purposes of processing, risks to the rights of the data subjects), shall take appropriate technical and organizational measures and safeguards for the protection of personal data before commencing processing, and these shall be adapted on an ongoing basis for the current conditions of processing.
 - 4.14.2 Standard privacy protection means that the Company shall ensure that only the personal data necessary for each specific processing purpose are processed. The Company shall also ensure that personal data are not normally accessible to an unlimited number of natural persons without the intervention of a natural person.

5 Processing of special categories of personal data

- 5.1 Pursuant to GDPR, the special category of personal data (so-called "sensitive data") also includes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership. Furthermore, the GDPR also explicitly refers to sensitive personal data, such as the genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. Under Article 9 (1) of the GDPR, a general prohibition on processing of such data applies which will be lifted only if the conditions referred to in Article 9 (2) of the GDPR are fulfilled.
- 5.2 In contrast to the previous provision, the birth identification numbers and personal data relating to criminal convictions and offences are not treated as sensitive data. Likewise, the photo is no longer considered a sensitive data, so a regular security camera record or copy of an identity document including a photo on that document, do not meet this condition.
- 5.3 When processing personal data, the Company can also interact with sensitive data. This will include, in particular, health data required for labour relations purposes.

- 5.4 The processing of sensitive data may be carried out for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law. The Company shall be entitled to process sensitive data for labour relations purposes even without the consent of the data subject. In the event that the Company processes sensitive data on the basis of the consent of the data subject, it shall obtain *explicit* consent from the data subject for that purpose.

6 Rights of the data subjects

Right to information

- 6.1 Transparency is one of the basic principles of processing personal data. The Company therefore implements measures in its internal procedures to provide processing information to the data subjects. The legal framework for the provision of information to the data subjects is stipulated as follows:
- 6.1.1 information shall be provided in a concise, transparent, comprehensible and easily accessible form, formulated in a clear and simple manner;
 - 6.1.2 information may be provided in writing, by electronic means or by other means or orally upon request;
 - 6.1.3 information shall be provided free of charge, in the event of unjustified or inappropriate requests from data subjects, the Company shall be entitled to charge a reasonable fee or shall be entitled not to take action;
 - 6.1.4 The Company shall be entitled to request additional information to confirm the identity of the data subject.
- 6.2 The Company is authorized to fulfil the information obligation under Articles 13 and 14 of the GDPR in any appropriate and demonstrable manner, regardless of the form of the information provided. With regard to the circumstances of the processing, the Company may choose to provide this information, for example, by a link to its website, electronically via the web, in a separate pop-up window, on a hardcopy document, by incorporation into the contract documentation or general business terms, certified mechanisms, marks or seals, by sending it to the e-mail or postal address of the data subject, orally or in writing.

Scope of the obligation to inform

- 6.3 Where personal data relating to a data subject are collected from the data subject, the Company shall, at the time when the personal data are obtained, provide the data subject with all of the following information:
- 6.3.1 the identity and the contact details of the controller and, where applicable, of the controller's representative;
 - 6.3.2 the contact details of the data protection officer, where applicable;

- 6.3.3 the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
 - 6.3.4 where the processing is based on point (f) of Article 6 (1), the legitimate interests pursued by the controller or by a third party;
 - 6.3.5 the recipients or categories of recipients of the personal data, if any;
 - 6.3.6 where applicable, the fact that the controller intends to transfer personal data to a third country or international organisation and the existence or absence of an adequacy decision by the Commission, or in the case of transfers referred to in Article 46 or 47, or the second subparagraph of Article 49(1), reference to the appropriate or suitable safeguards and the means by which to obtain a copy of them or where they have been made available.
- 6.4 In addition to the information referred to in Article 6.3, the Company shall, at the time when personal data are obtained, provide the data subject with the following further information necessary to ensure fair and transparent processing:
- 6.5 the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
 - 6.6 the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability;
 - 6.7 where processing is based on point (a) of Article 6(1) or point (a) of Article 9(2), the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
 - 6.8 the right to lodge a complaint with a supervisory authority;
 - 6.9 whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data;
 - 6.10 the existence of automated decision-making, including profiling, referred to in Article 22 (1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Time limits for fulfilling the obligation to provide information

- 6.11 Regarding the deadlines for fulfilling the obligation to provide information, the following applies:
 - 6.11.1 if the Company obtains personal data from the data subject, it shall inform the data subject at the time of obtaining such data;

- 6.11.2 if the Company does not collect personal data directly from the data subject, it shall provide the data:
- a) within a reasonable period after obtaining the personal data, but at the latest within one month, having regard to the specific circumstances in which the personal data are processed;
 - b) if the personal data are to be used for communication with the data subject, at the latest at the time of the first communication to that data subject; or
 - c) if a disclosure to another recipient is envisaged, at the latest when the personal data are first disclosed.

Right of access to personal data

- 6.12 The right of access guarantees the data subject the possibility to verify what personal data of the subject are processed by the Company.
- 6.13 The data subject has the right to request the Company to access the personal data in accordance with the conditions of Article 15 of the GDPR. The right of access primarily includes the right of the data subject to obtain information whether the Company processes personal data about the subject. Only if the Company processes personal data about the data subject, the data subject shall be entitled to exercise further rights, namely:
- 6.13.1 the right to provide information under Article 15 (1) of the GDPR;
 - 6.13.2 the right to access personal data processed by the Company;
 - 6.13.3 the right to provide a copy of the processed personal data.
- 6.14 If the data subject does not explicitly indicate in their request that it also requests access to personal data or the provision of a copy of personal data under 6.5.1 and 6.5.2 above, the Company shall be entitled to consider the general request under Article 15 of the GDPR as a request for confirmation of whether the personal data are processed.
- 6.15 When providing information under Article 15 (1) of the GDPR, the Company shall be entitled to use the same method and means of providing information as in the providing of information under Articles 13 and 14 of the GDPR.
- 6.16 The right to provide a copy of personal data under Article 15 (3) of the GDPR is the supplementary right of the data subject within the right to access. By exercising the right to provide information under Article 15 (1) of the GDPR; the Company shall provide the data subject with only the categories of personal data concerned that are processed about the specific data subject (e.g. name, age). With the right to provide a copy of personal data pursuant to Article 15 (3) of the GDPR, the data subject shall exercise the right to be provided with a specific "value" of these personal data (e.g.: Jozef, 41). Copies of personal data may be provided in any commonly used electronic form, and upon request of the data subject, they will be provided in writing or electronically - depending on how the data subject requests a copy of the personal data.

- 6.17 The right of access under Article 15 of the GDPR, including any more specific rights contained therein, must not adversely affect the rights and freedoms of others. The term "others" may include, for example, other data subjects or persons other than the data subject which submitted the request.

Right to rectification

- 6.18 The data subject has the right to request the Company to rectify incorrect personal data on the data subject and has the right to have incomplete personal data completed, including by means of providing a supplementary statement. However, the Company as the controller shall decide whether the personal data is incomplete for processing purposes. The Company shall not be obliged to complete personal data at the request of the data subject if it does not deem it necessary for the given purposes, since the Company has a general obligation to process only the personal data necessary for the given purposes.

Right to erasure

- 6.19 The right to erase personal data is mistakenly perceived by the general public as an absolute right to delete all personal data at any time. In fact, the right to erasure is only applicable in the cases defined in Article 17 of the GDPR, which are not of a general or absolute nature. The data subject has the right to achieve the erasure of their personal data by the Company if they prove that some of the stipulated conditions were met. If the data subject requests erasure of their personal data by reason of the unlawful processing, for the purposes of this law the unlawful processing shall be deemed to be only such processing the unlawfulness of which has been duly decided by the competent court or the Office for Personal Data Protection.
- 6.20 The data subject must give sufficient reasons in their request for erasure of personal data, in particular by reference to the law under which their personal data should be erased (Article 17 (1) (e) of the GDPR) or by reference to a decision according to which the Company was unlawfully processing personal data (Article 17 (1) (d) GDPR). The Company shall be entitled to ask the data subject to complete the information. At the same time, the Company may refuse to take action following a request for the erasure of personal data, if one of the reasons referred to in Article 17 (3) of the GDPR applies.

Right to restriction of processing

- 6.21 The data subject has the right to request the Company to restrict the processing of data, in situations envisaged in Article 18 of the GDPR, whereas the fulfilment of these obligations shall be assessed in an appropriate manner, such as when assessing the reasons for the erasure of personal data explained in paragraph 6.4.2 above. If the conditions for restriction of processing are fulfilled, under Article 12 of the GDPR the

Company shall be obliged to restrict the processing within a reasonable time. Within this time limit the Company shall assess whether the request is justified.

Right to data portability

- 6.22 The data subject has the right to request the provision of personal data pursuant to Article 20 (1) of the GDPR only in relation to personal data which:
- 6.22.1 are processed by automated means (i.e., electronically);
 - 6.22.2 are processed on the legal basis of consent or performance of the contract (under Article 6 (1) (a) or (b) of the GDPR); and
 - 6.22.3 which the data subject provided to the bank by themselves.
- 6.23 The right to portability does not apply to personal data which the Company processes on other legal bases than consent or performance of the contract. Data categories that do not fall under the right of portability include, in particular, all personal data processed on the legal basis resulting from specific rules or legitimate interests of the Company as explained above.

Right to object

- 6.24 The data subjects have the right to object, for reasons related to their particular situation, against the processing of personal data by the Company on the legal basis of public or legitimate interest. Pursuant to Article 12 of the GDPR, when receiving the request of the data subject, the Company shall be obliged, within the specified time limit, to demonstrate to the data subject the compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or grounds for the establishment, exercise or defence of legal claims.
- 6.25 The data subjects shall have the right to object to the processing of personal data for the purpose of direct marketing, in which case the Company shall be obliged to cease the processing of personal data within the time limit defined under Article 12 of the GDPR.

Automated individual decision-making, including profiling

- 6.26 The Company does not carry out automated individual decision-making or profiling.

Exercise of the rights of data subjects

- 6.27 The data subjects shall be entitled to exercise their rights resulting from the GDPR to the Company through requests. The handling of requests of data subjects shall be included in the job responsibility of the corporate lawyer, who shall be obliged to act in compliance with this Policy and the GDPR.
- 6.28 In any request based on the rights of the data subjects resulting from the GDPR, the Company shall primarily identify the data subject in accordance with the provisions of

Article 12 of the GDPR. The Company shall not be obliged to take action at the request of the data subject unless the identity of the data subject is clearly authenticated. The data subjects may contact the Company in person, in writing, electronically or by telephone. In each of these cases, however, the Company shall be entitled to require additional information to verify the identity of the data subject. This also results from Article 12 (6) of the GDPR, where, if the Company has reasonable doubts concerning the identity of the natural person making the request, the Company may request the provision of additional information necessary to confirm the identity of the data subject. In this case the Company shall be entitled to request personal identification of the data subject at the premises of the Company.

- 6.29 The general time limit for processing of a data subject's request under Articles 15 to 20 of the GDPR is one month from the date of delivery of the request; and if at the time of the delivery of the request, the identity of the data subject is not successfully verified, the period of one month shall begin to run until the identity of the data subject will have been successfully verified ("monthly time limit"). The company shall be entitled to decide on extension of this monthly period by additional two months, taking into account the complexity of the request and the total number of requests received by the Company at that time. Whenever the Company decides to extend the given period, it shall be required to inform the data subject of any such extension together with the reasons for the not complying with the original monthly period.
- 6.30 If the Company does not take action on the request of the data subject, it shall inform the data subject within the monthly period of the reasons for not taking action and on the possibility of lodging a complaint with the Office for Personal Data Protection or of seeking a judicial remedy within one month from the delivery of the request. However, this obligation does not apply to a situation where the Company shall not take action at the request of the data subject because the Company cannot identify the data subject or the data subject refuses to provide additional information to verify their identity.
- 6.31 For reasons set out in Article 12 (5) of the GDPR, the Company shall be entitled to refuse taking action based on a request or may request a reasonable fee covering the Company's administrative costs in relation to the provision of information, notifications or in connection with the performance of the required authorization. The Company can take such action whenever the requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character. In particular, requests of the data subject shall be considered as unfounded if the following applies:
- 6.31.1 data subject requests unauthorised access to confidential or sensitive information, regardless of their intention in relation to that information;
 - 6.31.2 requests which are expressly harassing the Company's employees or the Company itself;

- 6.31.3 requests which are vulgar or contain elements of racial, ethnic, gender, sexual, sexual or religious hatred;
- 6.31.4 requests which are so general by nature or are so incomprehensible that the Company shall be unable to identify from the request which right is exercised by the data subject;
- 6.31.5 requests of the data subject for information, notifications or measures which do not expressly follow from Articles 15 to 20 of the GDPR;
- 6.31.6 requests which repeatedly target the same fact that the Company had already repeatedly explained to the data subject and under these circumstances it must be clear to the data subject that there is no reason for the Company's response to change;
- 6.31.7 requests which raise suspicion of the intention of the data subject in connection with their request, to commit proceedings which could result in criminal liability or damage to the Company or other persons;
- 6.31.8 requests in which the data subject has produced image, sound or audio-visual recordings of the employees of the Company or the Company itself;
- 6.31.9 requests where the data subject has acted in an aggressive manner, under the influence of alcohol or narcotics, or has put at risk the safety of other persons in the area.
- 6.32 The Company shall maintain the electronic records of all received requests of the data subjects and their processing by the Company, at least to the following extent: (i) the date of receipt, (ii) the content of the request, (iii) the method of processing the request, and (iv) the date of notification of the data subject.
- 6.33 The processing of the request to exercise the right of data subject is described in the table below:

	Activity	Activity description	Data protection officer
1	Receipt of request	<ul style="list-style-type: none"> Information on the received request is collected and processed at the HR department. If the request is received elsewhere, it will be immediately transferred to the HR department. 	Authorised employees, Legal Department,
2	Identification of the data subjects	<ul style="list-style-type: none"> The Company shall, in an appropriate manner, examine and clearly identify the identity of the data subject, e.g. by phone or text message, or by another appropriate method. The Company shall be required to facilitate the exercise of rights and remove any discrepancies in conjunction with the data subject. 	Authorized person, Legal Department

	Activity	Activity description	Data protection officer
3	Checking the lawfulness of the request	<ul style="list-style-type: none"> The Company shall verify that the GDPR conditions are met for the exercising of a particular right. 	Authorized person, Legal Department
4	Identification of personal data	<ul style="list-style-type: none"> The Company shall identify the personal data of data subjects and the legal basis of such processing 	Authorized person, Legal Department
5	Check for the existence of legitimate reasons for the processing of personal data	<ul style="list-style-type: none"> In the case of a legitimate complaint against processing, the Company shall investigate whether it is necessary to further process the personal data of the data subject. This case may occur if: <ul style="list-style-type: none"> there are legitimate reasons for processing that override the interests, rights and freedoms of the data subject; or processing is necessary to exercise or to protect the legal claims of the Company 	Authorized person, Legal Department
6	Handling of the specific right of the data subject	<ul style="list-style-type: none"> According to the specific law being exercised, the Company shall provide the processing of a request in accordance with GDPR. 	Authorized person, Legal Department
7	Communication with the data subjects	<ul style="list-style-type: none"> The Company shall notify the data subjects of the measures taken. 	Authorized person, Legal Department
8	Documentation and ensuring traceability of the request	<ul style="list-style-type: none"> The Company shall document any communication with the data subjects, as well as the related internal action and the adopted measures. This includes evidence of the adoption of technical and organizational measures to prevent further processing of erased personal data. 	Authorized person, Legal Department

7 Impact assessment and prior consultation

7.1 The Company has carried out an analysis of the impact assessment obligation and prior consultation, and these obligations do not arise in connection with the processing operations carried out by the Company.

8 Security of personal data

Adequacy of security measures

- 8.1 The Company shall, at all times, ensure a reasonable level of protection of the personal data it processes, in accordance with the GDPR, taking into account:
 - 8.1.1 latest knowledge;
 - 8.1.2 cost of implementing measures;
 - 8.1.3 nature, scope, context and purpose of the processing;
 - 8.1.4 risks of different likelihood and severity for the rights and freedoms of natural persons.
- 8.2 The Company has implemented some or all of the following measures to ensure the security and integrity of personal data:
 - 8.2.1 pseudonymisation and encryption of personal data;
 - 8.2.2 the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
 - 8.2.3 the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
 - 8.2.4 a process for regular tests, assessment and evaluation of the effectiveness of technical and organisational measures to ensure the security of the processing.
- 8.3 The Company shall also provide for the protection of personal data through regular training of its employees who are authorised, within their job responsibility, to access personal data. The trainings shall take place at least once a year.
- 8.4 The IT employees of the Company shall identify, evaluate and manage information security risks. Existing and new hardware shall be configured professionally. The Company shall ensure safe use of portable storage devices (USB, CD). The Company shall allocate user accounts to employees so that they only have access to such information/equipment/data they need to perform their job. The Company shall impose an obligation for the employees to regularly change access passwords to computers and programs. The Company shall provide for detection of any unauthorized access to them.
- 8.5 Authorized persons are required to process personal data in such a way as to prevent any unauthorized or accidental access to personal data, their alteration, destruction or loss, unauthorized transfers, any other unauthorized processing, or other misuse of personal data from occurring.
- 8.6 Documents and digital recording media which contain personal data must be secured in lockable premises of the Company or in other places where they can be protected. Employee access to personal data shall be kept in the records stating at least what personal data and for what reason they were made available.
- 8.7 Data containing personal data that are stored on the servers of the Company or employees are protected against unauthorized access by individuals, against the change, destruction, loss, unauthorized processing, and other misuse of personal data, mainly by using individual user passwords, encryption, backup, etc.

- 8.8 Employees of the Company shall not be entitled to upload personal data to any portable computer or any portable data carrier that may be retrieved from the premises of the Company. Exceptions are granted to authorized persons if personal data are encrypted or other technical or security measures have been implemented.
- 8.9 Employees of the Company having access to personal data are required to maintain confidentiality of personal data and security measures taken to protect personal data. Authorized persons are required to handle personal data only for the purpose of performing their duties and in accordance with the obligations laid down by the relevant legislation, this Directive and the Company's instructions.
- 8.10 The Company shall maintain records on the processing of personal data in accordance with the GDPR, separately for each processing of personal data by its purpose.
- 8.11 Both the company and the authorized person shall supervise the submission of personal data to the relevant systems and their processing, and shall keep records of personal data, including details of their transmission or disclosure to third parties. At the same time, the Company shall keep records of authorized persons who are authorized to process personal data, including the form, extent and reason why personal data are processed by these persons.

Communication of a personal data breach

- 8.12 The Company shall communicate a breach of personal data protection within 72 hours of verification whether there has been a breach of personal data protection and what risks this may pose to the rights and freedoms of natural persons. The company shall be required to perform the verification in the previous sentence without delay after identification that a personal data breach may have occurred.
- 8.13 The company shall notify a breach of personal data protection under Article 33 of the GDPR, using a specific form in Annex No. 1 of this Policy.

9 Other entities involved in the processing of personal data

Provision of personal data

- 9.1 In the performance of the Company's activities, the Company shall provide personal data as a controller to other entities. With regard to the fact that neither GDPR nor the Privacy Act explicitly require the provision of personal data to another entity using the consent of the data subject, it stands that the provision of personal data is a processing operation that may take place on any legal basis permitted by the GDPR.
- 9.2 In some cases, the Company shall be required by specific regulations to provide personal data to other entities. Personal data processed by the Company may be accessed by the

Office for Personal Data Protection, law enforcement agencies, tax authorities, and other entities.

Use of processors

- 9.3 The company may use the processors who will process personal data on its behalf. The use of processors is not subject to the consent of the data subject. Where processing is to be carried out on behalf of the Company, the Company shall use only processors providing sufficient guarantees to implement appropriate technical and organisational measures in such a manner that processing will meet the requirements of GDPR and to ensure the protection of the rights of the data subject.

10 Data protection officer (DPO)

- 10.1 The Company has carried out an analysis of the obligation to appoint a data protection officer, and the result of the analysis is that the Company does not have such obligation.

11 Disposal of personal data

- 11.1 The company periodically liquidates personal data for which the purpose of processing had ceased to exist. The erasure of obsolete and unnecessary personal data shall be performed by the Company's employees on a regular basis once a year. Disposal shall take place in a technically safe manner in order to eliminate the risk of data misuse. Paper data carriers will be shredded and electronic carriers will be erased to ensure that the data cannot be restored.

12 Final provisions

- 12.1 This Policy was adopted by the Company to ensure compliance with the GDPR and to regulate the rights and obligations of the relevant subjects involved in the processing operations.
- 12.2 The wording of the Policy has been drafted in accordance with the GDPR and, to the extent necessary, with specific legislation.
- 12.3 The attachments form an integral part of this Policy.
- 12.4 These Principles and all relationships arising therefrom will be governed by the laws of the Slovak Republic.

Version	Validity/Effective Date	Prepared by	Approved by
1.0	25. 5. 2018	Mag. Oliver Benda	Ing. Tibor Majzún

ATTACHMENTS:

Annex No. 1 NOTICE OF PERSONAL DATA SAFETY BREACH – SAMPLE

Annex No. 2 PRINCIPLES OF PROCESSING PERSONAL DATA – INFORMATION FOR BUSINESS PARTNERS, CUSTOMERS, RECIPIENT OF SHIPMENTS AND CONTACT PERSONS

Annex no. 3 PRINCIPLES OF PROCESSING PERSONAL DATA – INFORMATION FOR JOB APPLICANTS

Annex no. 1
NOTIFICATION OF PERSONAL DATA SAFETY BREACH – SAMPLE

Office for Personal Data Protection of the Slovak Republic
Hraničná 4826/12
820 07 Bratislava

[DATE]

Subject: **Notification of personal data safety breach**

To the Office:

according to Article 33 (1) of the GDPR, *in the case of a personal data breach, the controller shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority competent in accordance with Article 55, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.*

The Controller - **cargo-partner SR, s.r.o.**, with its registered office: Kopčianska 92, 852 03 Bratislava, Identification number: 31 358 152, registered in the Commercial Register of the District Court Bratislava I, Section Sro, Inset No.: 5741 / B "on [DATE] at [TIME] detected breach of personal data. Pursuant to the above mentioned provision of the Regulation, the Controller hereby notifies the relevant Office for Personal Data Protection of the following facts:

- **Nature of the breach**

[describe the nature of the personal data breach including, where possible, the categories and approximate number of data subjects and the categories and approximate number of personal data records concerned]

- **Contact point for additional information**

[provide name, surname and contact details of the person who can provide detailed information]

- **Likely consequences of the breach**

[describe the likely consequences of a personal data breach]

- **Measures taken**

[describe the measures taken or proposed to be taken by the controller to rectify the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects]

Sincerely,

cargo-partner s.r.o.

Name, surname, position

Annex no. 2

PRINCIPLES OF PROCESSING PERSONAL DATA - INFORMATION FOR BUSINESS PARTNERS, CUSTOMERS, RECIPIENT OF SHIPMENTS AND CONTACT PERSONS

Information on processing of personal data

in accordance with **Article 13 and 14** of the Regulation (EU) No. 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 ("GDPR")

This document provides information about the processing of your personal data by the **cargo partner SR, s.r.o.**, as well as your rights related to this processing. **cargo partner SR, s.r.o.** is the data controller for the processing of your personal data, i.e. a person which shall decide on the purposes and means of processing and on the processing of your personal data for the following purposes.

Contact information:

cargo-partner SR, s.r.o.

registered office: Kopčianska 92, 852 03 Bratislava

Identification number: 31 358 152

Registered in the Commercial Register of the District Court Bratislava I, section. Sro, Inset No.: 5741/B

Phone number: +421 (0) 2 68242 300

Fax: +421 (0) 2 68242 222

(hereinafter referred to as "Company" or "We" in the appropriate grammatical form)

What data we process

We process the following personal data:

- a) **identification details**, including, in particular, title, first and last name, ID and VAT number, if you are an entrepreneur, and your position in the organization, if you represent a legal entity;
- b) **contact details** including personal data which allow us to contact you, in particular: e-mail address, phone number, postal address, employer address, department, job description, billing address;
- c) **data about services ordered** including, in particular, information about shipments that you or your company have ordered with us, form of payment, including your payment account number, and complaint data;
- d) **data relating your visit to our facility**, especially records from CCTV camera systems in branch offices
- e) **information about your behaviour on the website** during your visit of our website <https://www.cargo-partner.com/>.³

Why do we process personal data and what entitles us to process such data?

As part of our operation, we process personal data for various purposes and to various extent, either:

- a) **without your consent** on the basis of performance of the contract (Article 6 (1) (b) of the GDPR), our legitimate interest (Article 6 (1) (f) of the GDPR) or processing necessary for compliance with a legal obligation (Article 6 (1) (c) of the GDPR), or
- b) **based on your consent** (Article 6 (1) (a) GDPR).

What type of processing we may do without your consent depends on the purpose of such processing and what is your position in relation to us - whether you have concluded a contract with us, ordered a service, or, whether, at the given time, there is no contractual relationship between you and cargo-partner SR, s.r.o. We may also process your data if you are the recipient of a shipment that has been ordered with us, if you communicate with us or if you visit our facility.

Purposes of processing

1. If you order a shipment or conclude a contract with us

If you order transport of a shipment or conclude a contract with us for providing a service or another contract, we will perform the following processing:

1.1. Processing based on performance of the contract

If you are a natural person and you order transport of a shipment with us, we will process your personal data **for the purpose of transport and tracking of the shipment**, in the case of another contract, for the purposes of that contract performance we will process your **identification and contact details and details of your orders**.

³ For information on the processing of your personal data during your visit of our website, please see the "Privacy Policy" section at <https://www.cargo-partner.com/rechtliches/privacy-policy/>.

In case you order with us the transport of a shipment with as an employee of a legal entity, we will process the following data **for the purpose of transport and tracking of the shipment** , and, in the case of another contract, then for the purpose of this contract performance: your **identification and contact details and data on the services ordered, pursuant to § 78 (3) of the Act No. 18/2018 Z. z. on the Protection of Personal Data and on Amendments to Certain Acts (the "Act")**.

Using this data for the purpose of shipping and tracking a shipment or performance of a contract means that we will use them in particular for the following purposes:

- so that we can communicate with you about your shipment being transported, for example, to send you a confirmation of the shipment delivery;
- for the purposes of payment for transport or other service, or for the delivery of the service; to that end, we may also provide your data to our other shipping partners as described in the section [Who processes your personal data and to whom we provide those data?](#);
- in connection with a complaint;
- in connection with your other requirements.

1.2. Processing on the basis of legitimate interest

If you order transport of a shipment or conclude a contract with us, we will process your **identification, contact details, and data on ordered services** based on our legitimate interest (without your consent) in order to protect legal claims, keeping our internal records, statistics and audit, to complete satisfaction surveys in order to improve the services provided, as well as marketing activities (provide information on goods or services similar to those you have purchased) by e-mail or by phone. Our legitimate interests include the protection of legal claims and checking the due provision of our services, and direct marketing.

1.3. Processing based on legal obligations

We must also comply with certain legal obligations. If we process your personal data for this reason, we do not need your consent to such processing. On this legal basis, we process your identification, contact details and data on ordered services, in particular to comply with the following regulations: Act No. 40/1964 Coll. - Civil Code, Act No. 513/1991 Coll. - Commercial Code, Act No. 250/2007 Coll. on the Consumer Protection (if you order the transport as a natural person), Act No. 222/2004 Coll. on Value Added Tax, Act No. 431/2002 Coll. on Accounting, Act No. 395/2002 Coll. on Archives and Registers, IATA rules on air transport, EU regulations targeted against the support of terrorism, money laundering, etc.

2. If you are the recipient of a shipment the transport of which was ordered with us

If you are the recipient of a shipment the transport of which was ordered with us, we will process your **identification and contact data**:

- in order to fulfil the shipping contract, to transport and track the shipment;
- in order to fulfil legal obligations, in particular pursuant to the Act No. 222/2004 Coll. on Value Added Tax and Act No. 431/2002 Coll. on Accounting;
- in order to protect legal claims and keeping of our internal records, statistics and audit; our legitimate interests here include the protection of legal claims and the checking the due provision of our services.

3. If you communicate with us via different channels

If you communicate with us via different channels, especially via phone, email and social networks, we will process your **identification, contact information, and records of communication** based on our legitimate interest (i.e. without your consent) for these purposes:

- to process your requirements; if you ordered a shipment transport with us, or you have entered into another contract with us and your request relates to this contract, we may process such data based on the performance of the contract concluded with you;
- to record your requests so that we can check that we fulfil them in due and timely manner;
- evidence that we have accepted and processed your request, e.g. when you order some goods using this channel or when you raise a complaint;
- data analysis to improve the quality of our services.

4. If you visit our facility

If you visit our branch office or its neighbouring area, we will process the CCTV video recordings on which you may be recorded, based on our legitimate interest (i.e. without your consent) in order to protect your and our property, life and health of persons moving around the branch office and its neighbouring area, as well as to prove and investigate any damage claims.

For this purpose, we will keep personal data for a period of 14 days. If the record is used in criminal or other proceedings to investigate the circumstances of the damage, crime, offence, etc., we will keep the personal data for the time necessary for such purpose.

5. If you give us your consent

If you have not used our services yet (you did not conclude a shipping contract with us, nor did you order shipment transport with us) and you give us your consent at the time of providing your data, we may use your **identification and contact data** to send you offers by e-mail, text message, to notify you of our offers by phone or other electronic means, or we can send them to you by post.

Your consent is completely voluntary and you can withdraw it at any time. To withdraw your consent please contact us as described in the section [How to apply individual rights?](#) Withdrawal of the consent does not affect the lawfulness of data processing until the moment of withdrawal.

How long shall we be processing your personal data?

We shall be processing your data for a given purpose only for the time necessary to achieve the purpose of processing, including archiving, for a maximum period of 10 years from the end of the business relationship and settlement of all related business obligations (unless the legislation provides for a longer period). Personal data for marketing purposes will be processed for a period of 5 years from the date of giving the consent. Personal data will be always erased (deleted) without undue delay after the purpose (or legal reason) of the processing has ceased to exist; or after the expiration of the statutory period during which we were authorized or obliged to process such data.

Who processes your personal data and to whom your data is provided?

We shall process the above personal data as the data controller.

We may also provide your personal data to other entities which are in the role of the **controller**, namely:

- if you are the recipient of the service that is ordered with us, we may provide your personal data to our partners involved in this performance, as listed in the section [If you are the recipient of a shipment the transport of which was ordered with us](#), specifically, to the partners who provide the transport and delivery of shipments, e.g. to our foreign partners at the time of international shipping;
- as part of the fulfilment of our legal obligations to the administrative and state authorities, if we have such obligation or if we are called upon to do so;
- our partners providing shipping on our behalf (courier).

We also transfer personal data within the cargo-partner group. Data transfer within the group takes place especially in the case of products or services that are subject to international shipping and without which the service or product cannot be delivered. In particular, this includes the transfer of contact or identification data to other cargo-partner companies that provide shipping services on behalf of cargo-partner SR, s.r.o. in the final destination, based on the performance of a contract obligation or based on legitimate interest for the administrative and statistical needs of the group and, furthermore, to provide those data to the controllers in the group for the purpose of the shipment delivery. Further, this may include processing in legitimate interest or performance of a legal obligation the aim of which is mostly to ensure security.

For personal data processing we also use third party services that process personal data on their own behalf only according to our instructions and for the purposes described in [Why do we process personal data and what entitles us to process such data?](#) Such **third parties** include, in particular, lawyers, tax consultants, auditors and debt collection agencies.

From what sources do we obtain personal data?

In most cases, we process personal data provided by you to us when ordering services or communicating with us. If you are the recipient of a shipment which we are transporting, we will collect your details from the person who ordered the transport.

Transfer of personal data outside the EU and the EEA

As part of providing data to the recipients listed in [Who processes your personal data and to whom we provide your data?](#) we may also transfer your data to third countries outside the EU and the European Economic Area that do not guarantee adequate level of personal data protection. We will only complete such transfers if it is necessary to perform a contract between you and us as a controller, to execute pre-contract measures taken at your request as the data subject, to conclude or perform a contract concluded in your interest between you and another person or if such transfer is necessary to prove, enforce or defend our legal claims. Except those cases, we may also complete such transfer upon your express consent after providing the information on the risks associated with such transfer. In other cases, the transfer of personal data outside the EU and the EEA is subject to the conclusion of the Standard Contractual Clauses.

What are your rights in processing of your personal data?

- **right of access (Article 15 of GDPR)** - the right to obtain confirmation of processing (no processing) of your personal data as well as the right to access personal data which apply to you and which we process
- **right to rectification (Article 16 of GDPR)** - if you find out that your personal data being processed by us are inaccurate or incomplete, you have the right to have us rectify or amend the data without unnecessary delay
- **right to erasure or restriction of processing (Articles 17 and 18 of GDPR)** - the right to erasure or restriction of the processing of your personal data if the conditions provided by legal regulations are fulfilled
- **right to data portability (Article 20 of GDPR)** - the right to obtain from us all your personal data that you have provided to us and which we process based on your consent and the performance of the contract. We will provide your personal data in a structured, commonly used and machine-readable format. In order to easily transfer your data at your request, this may only include data which we process by automated means in our electronic databases
- **right to object to processing (Article 21 of GDPR)** - right to object to the processing of personal data based on our legitimate interest, including objection to processing for direct marketing purposes

- **right to lodge a complaint with the supervisory authority (Article 77 of GDPR)** - the right to lodge a complaint with the Office for Personal Data Protection at Hraničná 12, 820 07 Bratislava. You may exercise this right, in particular if you believe that we process your personal data improperly or in violation of generally binding legal regulations.

How can you exercise your rights?

In all matters relating to the processing of your personal data by cargo-partner SR, s.r.o. you can contact us using the email address dataprotectionoffice@cargo-partner.com or contact us by phone at +421 (0) 2 68242 300.

We will process your request without undue delay, but no later than one month. In exceptional cases, especially due to the complexity of your request, we will be authorized to extend this period for a further two months. We will, of course, inform you of any possible extension and reasons thereof.

Version: [1.2]

Effective since: [06.12.2018]

Annex no. 3
PRINCIPLES OF PROCESSING PERSONAL DATA – INFORMATION FOR JOB
APPLICANTS

Notice on the processing of personal data
for job applicants in the cargo-partner SR, s.r.o.

25 May 2018

1. Name and contact details of the data controller

In accordance with the Regulation (EU) No. 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 repealing Directive 95/46/EC (General Data Protection Regulation, "GDPR"), the data controller is the Multi Transport und Logistik Holding AG (P.O. Box 1, Airportstrasse, 2401 Fischamend, Austria), as well as cargo-partner SR, s.r.o., with registered office at Kopčianska 92, 852 03 Bratislava, Identification number: 31 358 152, registered in the Commercial Register of the District Court Bratislava I, section Sro, insert No.: 5741/B, which is marked in the list in accordance with point 4. "*" (hereinafter referred to as "we" or "company").

As a data subject who is not a company employee, you will find in this document all the requisites required by Art. 13 GDPR, as well as other necessary information regarding the processing of your personal data by the Company.

2. General Terms of Data Processing

Any job seeker may apply for a job in the Company using Profesia.sk job portal and the Company's online portal, by sending a written request to the Company address by post, email, or delivery in person.

Categories of personal data processed include, in particular: your "main" data to the extent of the title, first name, family name, permanent residence, temporary residence, age, sex, all data and other records listed in the official education document, signature, contact details (in particular, telephone number and e-mail address), CV data, language skills, experience, completed courses (name, country), certificates (name, period of validity, issuer, country), skills (name, level), expected salary, expected job responsibilities, expected job location and other data given in the CV, statement of purpose and personal questionnaire for the purpose of registering job applicants, (hereinafter "job applicant data").

In order to ensure the confidentiality, integrity and availability of the personal data of the data subjects, the Company shall use modern IT security systems. The Company shall adopt appropriate safety technical and organizational measures against unlawful or unauthorized processing of personal data and against accidental loss of or damage to personal data. Access to personal data is only available to persons who need it in order to perform their professional duties and are bound by statutory or contractual obligations of confidentiality.

3. Data processing in "Job application"

3.1. Scope of data processing

The personal data of a job applicant are provided to the company via the Profesia.sk job web portal, the online web portal of the Company, sending the job application to the company by post, by e-mail or by delivery in person, or during communication with the applicant during the admission process. Your job application shall always be delivered to a specific company of the cargo-partner group for the position you are applying for.

The Company will thoroughly evaluate your application and will compare your professional experience with the current needs and requirements for the specific job position. If we become interested in your profile and have a suitable job position for you, we will invite you to a personal interview.

3.2. Legal basis for processing of personal data

The legal basis for the processing of personal data shall be stipulated by Article 6 para. 1) b) of the GDPR Regulation – processing as part of pre-contractual relationships.

3.3. Purpose of data processing

Job applicant data provided by the applicants via the Profesia.sk job web portal, online web portal of the Company or by sending the application to the company's e-mail address or post or in person, may be processed solely for the purposes of processing your job application and for its assessment in the selection process, and also for the purposes of assessing the suitability of the candidate for the job position they are applying for.

The act of providing your personal information, as well as granting your consent to processing is voluntary. However, if you choose not to provide this information, we will not be able to commence or continue the selection process in connection your application.

3.4. Period of data retention

We shall keep the data of job applicants in the database for the duration of the selection process and for the period during which we must be able to demonstrate adherence to the non-discrimination principle.

4. Database of applicants

4.1. Scope of processing personal data

We shall maintain the data of job applicants in our database of candidates to be able to consider them for future vacancies. This database can only be accessed by the employees of HR department in cargo-partner SR, s.r.o. Submission of the data of the applicant to another cargo-partner company (see table 1) is only possible with the written consent of the applicant, who may voluntarily express the consent using the document titled "Consent to the Processing of Personal Data for job applicants" which will be completed during the job interview.

Table No. 1 List of selected cargo-partner group companies

company	city/country
cargo-partner GmbH	Fischamend/Austria
iLOGISTICS IT HOLDING GMBH	Fischamend/Austria
SPOTWORX GmbH	Fischamend/Austria
iLogistics IT Solutions GmbH	Fischamend/Austria
cargo-partner Group Holding AG	Fischamend/Austria
*cargo-partner SR, s.r.o.	Bratislava/Slovakia

4.2. Legal basis for processing of personal data

The legal basis for data processing in this case is set out by the Article 6 para. 1 a) GDPR or voluntary consent of the applicant who may voluntarily express the consent using the document titled "Consent to the Processing of Personal Data for job applicants" which will be completed during the job interview.

Should the applicant refuse to give their consent under the previous paragraph, the cargo-partner Company may process personal data of unsuccessful job applicants based on our legitimate interest in defending ourselves against any legal claims of unsuccessful applicants citing discrimination (Article 6 (1) (f) GDPR).

4.3. Purpose of data processing

If you wish to be contacted when a suitable job position appears in one of the companies in the cargo-partner group, your consent to the processing of personal data (after negative assessment of your earlier job application) shall be required.

4.4. Period of data retention

With your consent we may keep your data for a period of 12 months from the date of the selection process or until the consent is withdrawn (see 4.5). In the case of processing based on legitimate interest pursuant to 4.2 (2), we shall keep the personal data for as long as we will have to be able to provide evidence of non-discrimination.

4.5. Notice of withdrawal of consent

You may, at any time, withdraw your consent to processing without giving any reason, in writing or in electronic format, using the email address dataprotectionoffice@cargo-partner.com, or you may contact the respective cargo-partner company.

5. Rights of the data subject

You have the right to be informed about what personal data is collected and kept by the cargo-partner company, as well as about the purposes of such data processing and recipients of such data. You may request corrections or additions to the incorrect or incomplete data. In certain circumstances, for example, if the accuracy of the data is compromised, you may, until such time as the accuracy is verified, require that your data be processed only with your consent or for the purpose of claiming, exercising or defending legal claims, or in order to protect your right to privacy or privacy of other natural or legal person or for reasons of overriding public interest.

At the same time, you have the right to ask cargo-partner Company to send a copy of your data in a structured and readable format (Data Transfer Law) to you or, if technically possible, to a third party which you have specified.

Under certain circumstances, you have the right to ask us to erase your personal data, if, for example, the data had not been processed in accordance with the principles of privacy protection.

If you exercise your right to correct, erase or restrict data being processed by the cargo-partner Company, we must inform of such request all the recipients who have access to your data, unless this proves to be impossible or does not require disproportionate effort.

In exercising your rights, please contact cargo-partner company directly.

6. Supervisory Authority

If you believe that processing of your personal data is inconsistent with GDPR, you may file a complaint with the Austrian Data Protection Authority located at Wickenburggasse 8, 1080 Vienna and the Office for Personal Data Protection of the Slovak Republic, Hraničná 4826/12, 820 07 Bratislava. The above authority shall be competent to deal with any complaints concerning the processing of personal data. (Right to file a complaint)

Version: [1.2]

Effective since: [29.11.2018]