

## Personal Data Protection Policy

### Information on the Processing of Personal Data

In connection with the processing of personal data, and pursuant to Article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR) 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, we provide the following information on personal data protection:

#### Contact details of the data controller:

Company: MDM logistics s.r.o.

Address: Triblavinská 24, 900 25 Chorvátsky Grob, Slovak Republic

Company ID (IČO): 54527082

Tax ID (DIČ): 2121703419

VAT ID (IČ DPH): SK2121703419

Telephone: +421 940 642 304

Email: info@mdmlogistics.sk

#### Basic Terms:

**Personal data** are any information relating to an identified or identifiable natural person. This includes, for example, title, name, surname, job position, email, phone number, signature, image on camera recordings. A personal data point is any data specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of a natural person.

**Processing of personal data** refers to any operation or set of operations performed on personal data or on sets of personal data. This includes collecting, recording, organizing, storing, altering, retrieving, consulting, using, disclosing by transmission, dissemination or otherwise making available, aligning, combining, restricting, erasing, or destroying. It applies regardless of the means used.

**Controller** is the entity that determines the purposes and means of processing personal data. MDM logistics is the data controller.

**Processor** is a person or entity that processes personal data on behalf of the controller. Certain suppliers of MDM logistics act as processors, e.g., IT service providers.

**Data subject** is a natural person whose personal data are processed. This includes employees, suppliers, customers, etc.

**Information system** refers to any structured set of personal data processed for a specific purpose according to specific criteria, such as an attendance system.

**Profiling** is any form of automated processing of personal data involving the use of personal data to evaluate certain personal aspects of a natural person, especially to analyze or predict aspects such as work performance, economic situation, health,

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preferences, interests, reliability, behavior, location, or movements. For example, evaluating a bank client's creditworthiness. MDM logistics does not engage in automated decision-making or profiling.

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**GDPR** refers to Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

**Personal Data Protection Act** refers to Slovak Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments and Supplements to Certain Acts, as amended.

### Right to Information

Every data subject has the right to be informed about the processing of their personal data. Appropriate measures have been adopted to ensure that this information is provided properly to the data subjects.

MDM logistics fulfills this information obligation through this document, which is permanently published at [www.mdmlogistics.sk](http://www.mdmlogistics.sk).

A data subject may contact the supervisory authority at any time with a complaint or concern regarding personal data processing: **Office for Personal Data Protection of the Slovak Republic:**

Address: Park One Building, Námestie 1. mája 18, 811 06 Bratislava, Slovak Republic

Company ID (IČO): 36 064 220

Phone: +421 2 32 31 32 14

Website: <https://dataprotection.gov.sk/uouu/>

### Who is this information intended for?

The information provided on this page is intended for individuals whose personal data is processed by our company as a data controller.

#### 1. Customers, Website Visitors, and Employees of Business Partners

- Managing business records as part of the preparation, registration, and fulfillment of business contracts: Contract performance with the data subject (Art. 6(1)(b) GDPR)
- Registering incoming and outgoing mail and document archiving: Compliance with legal obligations (Art. 6(1)(c) GDPR)

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- Establishing, defending, and asserting legal claims: Legitimate interest of the controller (Art. 6(1)(f) GDPR)
- Handling data subject requests regarding data processing: Compliance with legal obligations (Art. 6(1)(c) GDPR)
- Ensuring cyber security of information systems: Legitimate interest of the controller (Art. 6(1)(f) GDPR)
- Business communication with customers and business partner employees: Legitimate interest of the controller (Art. 6(1)(f) GDPR)
- Accounting and fulfilling tax obligations required by law: Legal obligation (Art. 6(1)(c) GDPR)
- Sending commercial communications via email (newsletters): Legitimate interest of the controller (Art. 6(1)(f) GDPR)
- Online marketing and targeted advertising based on interests: Consent of the data subject (Art. 6(1)(a) GDPR)
- PR communication and brand awareness via social networks: Legitimate interest of the controller (Art. 6(1)(f) GDPR)

**Your personal data is processed by our trained and confidential employees, as well as:**

- Accounting offices , Auditors, and tax advisors
- Legal, consulting, and educational service providers
- IT service providers, web hosting, and email hosting providers
- Online services, chat tools, and social media platforms
- Courier, transport, and postal service companies
- Public authorities

Data is processed automatically or semi-automatically and is mostly stored electronically. We protect it using physical and technological security measures to ensure its integrity and availability throughout the storage period.

### **Retention Periods:**

- Business records and contracts: for the duration of the contract and 5 years after termination
- Accounting and tax records: 10 years (according to legal requirements)
- Mail records and document archiving: for the period defined by the company's retention plan under Act No. 395/2002 Coll.
- Legal claims: as long as necessary, typically 3 years for civil disputes, 4 years for commercial disputes
- Handling data subject requests: 5 years after resolution
- Cybersecurity records (logs): 1 year
- Communication with data subjects: 3 years from last contact
- Intra-group data sharing: duration of the employment or contractual relationship

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- PR via social networks: duration of employment or until objection
- Online marketing and interest-based advertising: 1 year after consent
- Newsletters: duration of the contract and 5 years after termination

### **Rights of Data Subjects in Relation to Personal Data Processing:**

According to the regulation, you have the following rights, which we as a data controller are obligated to uphold. You may exercise them by sending a request to our address by post, telephone, or email. We are required to verify your identity to ensure data is not misused.

- You have the right to access your personal data, including information about the purpose of processing, data recipients, and duration of processing.
- You have the right to rectification if your data is inaccurate or has changed — just contact us and we'll correct it.
- You have the right to erasure of personal data if it is inaccurate or unlawfully processed.
- If your data is processed based on consent, you may withdraw that consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.
- You have the right to restrict processing, where we will limit processing to legal necessities or suspend it entirely.
- You have the right to data portability, allowing you to transfer your data to another controller in an appropriate format (unless prevented by technical or legal constraints).
- You have the right to object to processing based on legitimate interests under Article 6(1)(f) GDPR, including objection to profiling.
- You have the right to lodge a complaint with the supervisory authority: **Office for**

#### **Personal Data Protection of the Slovak Republic**

Address: Park One Building, Námestie 1. mája 18, 811 06 Bratislava

Company ID: 36 064 220

Tel: +421 2 32 31 32 14

Website: <https://dataprotection.gov.sk/uouu>

## **2. Employees, Former Employees, and Their Close Persons**

Our business activity focuses on warehousing and delivery (logistics) of goods for companies engaged in online sales (i.e., e-shops) and providing related services.

Most of the personal data we process about job applicants is obtained based on their consent provided to the Profesia.sk portal and is processed based on the performance of a contract or steps taken prior to entering into a contract, where the applicant is the contracting party. We also process personal data to comply with legal obligations or based on our legitimate interests.

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### **Purposes and Legal Bases for Processing:**

- Communication with data subjects (employees, job applicants, customers, and employees of business partners): Legitimate interest of the controller (Art. 6(1)(f) GDPR)
- Handling requests from data subjects regarding personal data processing: Compliance with legal obligations (Art. 6(1)(c) GDPR)
- Establishing, defending, and asserting legal claims: Legitimate interest of the controller (Art. 6(1)(f) GDPR)
- Registration of incoming and outgoing mail and archiving of documents: Compliance with legal obligations (Art. 6(1)(c) GDPR)
- Providing personal data for effective administrative processing within the group of enterprises: Legitimate interest of the controller (Art. 6(1)(f) GDPR)
- Provision and disclosure of employee personal data in connection with their work duties: Legitimate interest of the controller (Art. 6(1)(f) GDPR)
- Fulfilling obligations in the area of occupational health and safety (OHS) and occupational health services (OHS-PHS): Legal obligation (Art. 6(1)(c) GDPR)
- Providing employee data to authorities and institutions under specific regulations (e.g., social insurance): Legal obligation (Art. 6(1)(c) GDPR)
- Fulfilling employment-related (HR) obligations of the employer toward the employee: Contract performance (Art. 6(1)(b) GDPR)
- Fulfilling legal obligations related to salaries: Legal obligation (Art. 6(1)(c) GDPR)

### **Your personal data is processed by trained and confidential employees, as well as:**

- Accounting offices, auditors, and tax advisors
- Providers of legal, consulting, and training services
- IT service providers, web hosting, and email hosting
- Online services, chat tools, and social networks
- Courier, shipping, and postal service providers
- Public authorities

We process your data automatically or semi-automatically and primarily store it electronically. It is secured through physical and technological means to ensure safety, integrity, and availability during the retention period.

### **Retention Periods:**

- Incoming/outgoing mail registration and document archiving: as per the company's retention schedule in accordance with Act No. 395/2002 Coll.
- Employee personal files: 70 years from birth
- Other data: 10 years after employment termination
- Payroll slips: 50 years
- Other data: 10 years after employment termination

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- Social insurance claims/applications/changes: 20 years
- OHS and OHS-PHS obligations: Duration of employment + 5 years after termination
- Disclosure of personal data in relation to work performance: Duration of employment
- Intra-group administrative processing: Duration of the employment or contractual relationship
- Legal claims: As needed (typically 3 years for civil disputes, 4 years for commercial disputes)
- Requests regarding data processing: 5 years after resolution
- Communication with data subjects: 3 years from the last communication

### **Rights of Data Subjects in Relation to Personal Data Processing:**

- You may exercise your rights in writing, by phone, or via email. We are obliged to verify your identity before processing your request.
- Right to access, rectification, erasure, restriction, portability, and objection
- Right to withdraw consent at any time (if applicable)
- Right to lodge a complaint with the supervisory authority: **Office for Personal**

#### **Data Protection of the Slovak Republic**

Park One Building, Námestie 1. mája 18, 811 06 Bratislava

IČO: 36 064 220

Tel.: +421 2 32 31 32 14

<https://dataprotection.gov.sk/uoou/>

### **3. Job Applicants**

Our business activity is focused on the warehousing and delivery (logistics) of goods for companies engaged in online sales (so-called e-shops), as well as providing related services. We obtain most of the personal data we process about job applicants based on their consent, which they have provided to the Profesia.sk portal. We process this data for the purpose of fulfilling a contract or taking steps prior to entering into a contract, where the job applicant is the data subject and a party to the contract. We also process personal data in order to comply with legal obligations or within the scope of our legitimate interest.

- Handling requests from data subjects related to personal data processing: Compliance with the controller's legal obligation pursuant to Article 6(1)(c) of the GDPR
- Establishing, defending, and asserting legal claims: Legitimate interest pursued by the controller pursuant to Article 6(1)(f) of the GDPR
- Registering incoming and outgoing mail and archiving documents: Compliance with the controller's legal obligation pursuant to Article 6(1)(c) of the GDPR

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- Communication with data subjects (employees, job applicants, customers, and employees of business partners): Legitimate interest pursued by the controller pursuant to Article 6(1)(f) of the GDPR
- Selection of job applicants for open positions:  
Performance of a contract to which the data subject is party, or to take steps at the request of the data subject prior to entering into a contract pursuant to Article 6(1)(b) of the GDPR

### **Your personal data is processed by our trained and confidentiality-bound employees, as well as by:**

- Accounting firms, auditors, and tax advisors
- Providers of legal, consulting, and training services
- IT service providers, web hosting and email hosting providers
- Online services, chat tools, and social networks
- Courier, transport, and postal companies
- Public authorities

We process your personal data either automatically or semi-automatically, and it is mostly stored electronically. We protect your data using physical and technological security measures to ensure its safety, integrity, and availability throughout the retention period.

### **Retention Periods:**

- Registration of incoming/outgoing mail and archiving of documents: For the period specified in the company's records retention plan in accordance with Act No. 395/2002 Coll.
- Establishing, defending, and asserting legal claims: For the period necessary to fulfill the purpose, typically 3 years for civil law disputes and 4 years for commercial law disputes
- Handling requests from data subjects related to personal data processing: 5 years after the request has been addressed
- Communication with data subjects (employees, job applicants, customers, and employees of business partners): 3 years from the date of the last communication
- Selection of job applicants for open positions: During the selection process and for 3 months after its conclusion

### **Rights of Data Subjects in Relation to Personal Data Processing:**

Under the GDPR, you have the following rights, which we, as the controller, are obliged to honor. You can exercise these rights by sending a request to our address by post, phone, or email. However, we are obliged to verify your identity to ensure that your data is not misused.

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- The right to access your personal data, including the purpose of processing, the recipients, and the duration of processing
- The right to rectification of incorrect or outdated personal data
- The right to erasure of your personal data if it is incorrect or processed unlawfully
- The right to withdraw consent at any time (if processing is based on consent), without affecting the lawfulness of processing carried out before withdrawal
- The right to restriction of processing – we will process your data only for the most necessary legal reasons or not at all
- The right to data portability, allowing you to receive your data in a structured, commonly used format and transmit it to another controller (subject to technical and legal feasibility)
- The right to object to processing of your personal data if it is based on legitimate interests, including profiling
- The right to lodge a complaint with the supervisory authority: **Office for Personal Data Protection of the Slovak Republic**

Park One Building, Námestie 1. mája 18, 811 06 Bratislava

IČO: 36 064 220

Phone: +421 2 32 31 32 14

Website: <https://dataprotection.gov.sk/uouu/>

### How to Exercise Your Rights?

You can exercise your rights in writing by post to the controller's address or by email to: [info@mdmlogistics.sk](mailto:info@mdmlogistics.sk)

MDM logistics records each request and processes it without undue delay, but no later than within one month. Within this time frame, the data subject who submitted the request will be informed of the measures taken. If necessary, this period may be extended by an additional two months, taking into account the complexity and number of requests. The data subject will be informed of any extension within one month, along with the reason for the delay.

The notification of the outcome of the request will be made in the same manner in which the request was submitted, unless the data subject requests a different method.

Requests are handled free of charge. However, if the request is manifestly unfounded or repetitive, we may charge a reasonable fee reflecting administrative costs or refuse to act.

### How Your Personal Data Is Protected

- We ensure the protection of personal data through appropriate technical, organizational, and security measures, taking into account the risks involved, the nature of the processing, current best practices, and implementation costs.



## Personal Data Protection Policy

- Personal data is protected using appropriate and available means against misuse. It is stored in spaces, locations, environments, or systems with restricted, predefined, and continually monitored access.
- Any security incident involving personal data is handled immediately. If it is likely to pose a high risk to the rights and freedoms of individuals, we will inform the data subject and notify them of the remedial measures taken.

If you have any questions, do not hesitate to contact us at: [info@mdmlogistics.sk](mailto:info@mdmlogistics.sk)