

PRIVACY POLICY

We strive to respect your privacy by complying with all applicable regulations relating to data protection, including Regulation (EC) 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 (hereinafter referred to as „GDPR“) in conjunction with Act No 18/2018 Coll. on the protection of personal data and on the amendment and supplementation of certain acts (hereinafter referred to as „the Act“). In this context, we have taken appropriate technical, organisational and personnel measures to ensure the protection of your personal data.

This policy is intended to inform you about which personal data we process about you or which personal data you provide to us via our website <https://cybergame.sk-cert.sk>. Please read the following carefully to understand our approach and procedures regarding your personal data and how we will treat it.

Personal data controller

The personal data controller is **Produkcia s.r.o.**, Lýcejná 4, 811 03 Bratislava, ID No.: 36 830 194 (hereinafter referred to as the "Controller").

Any questions regarding privacy can be addressed in writing by email to: produkcia@produkcia.eu

We process personal data for the following purposes:

Purpose # 1	Legal Basis
Conducting public opinion polls	Article 6(1)(f) GDPR Legitimate interest and Article 6(1)(a) GDPR (visual, audio and visual-audio recordings) - which allow us to carry out our activities in the field of conducting surveys for collection, sorting, recycling, good habits and recommended practices in these activities and environmental protection and public awareness in this area
Purpose # 2	Legal Basis
Supporting the activities of the operator through marketing activities	Article 6(1)(f) GDPR Legitimate interest - GDPR Legitimate interest - which enables us to develop our business and other activities by sending marketing content to data subjects who have used or expressed an interest in using our services in the past. Article 6(1)(a) GDPR Consent to the processing of personal data - which allows us to process your personal data for those marketing purposes for which we do not have a legitimate interest under Article 6(1)(f) GDPR
Purpose # 3	Legal Basis
Provision of training, awareness-raising	Article 6(1)(b) GDPR Contract fulfilment - provision of

and other professional services	training and other services on the basis of an order or a specific contract
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Purpose # 4	Legal Basis
Social Networks	Article 6(1)(f) GDPR Legitimate interest - GDPR Legitimate interest - processing of personal data of visitors to a social network profile; reactions, comments or messages provided voluntarily by the data subject

Purpose # 5	Legal Basis
Purposes relating to the protection of legal or legitimate interests, legal claims, judicial or other decisions of public authorities	Article 6(1)(f) GDPR Legitimate interest - GDPR Legitimate interest - processing of personal data in case of future legal claims, whether by a third party against the controller or vice versa

Purpose # 6	Legal Basis
HR and payroll	Article 6(1)(c) GDPR Compliance with legal obligations - GDPR Legitimate interest - processing of personal data of employees and persons performing work outside the employment relationship to the extent within the meaning of generally binding legal regulations

Purpose # 7	Legal Basis
Accounting and tax purposes	Article 6(1)(c) GDPR Compliance with legal obligations - GDPR Legitimate interest - processing of personal data within the meaning of generally binding legislation

What kind of personal data do we process?

In the process of operating its activities, the Operator collects certain information (hereinafter referred to as „personal data“) relating to identified natural persons (or information through which natural persons could be identified), which is provided to us directly by natural persons, namely:

For purpose # 1

a common category of personal data, namely

- visual, audio and audio-visual recordings of the person concerned,

For purpose # 2

a common category of personal data

For purpose # 3

a common category of personal data

For purpose # 4

a common category of personal data, namely the visitor's login name (in the range of first name; first and last name, nickname, etc.)

For purpose # 5

a common and special categories of personal data

For purpose # 6

a common and special categories of personal data

For purpose # 7

a common and special categories of personal data

Automated decision-making, including profiling

The personal data referred to herein is not subject to automated decision-making, including profiling.

Who do we disclose your personal data to?

In order to fulfil the purposes described above, the Controller uses the services of various suppliers, some of whom are third parties/recipients who are not intended to process the data, but may have access to it in the performance of their tasks or in the course of their cooperation with the Controller, in particular:

- the administrator of the Operator's website;

In the context of the processing activities described above, your personal data will not be transferred to countries or international organisations outside the European Union or the European Economic Area.

In the event that we intend to transfer your personal data to countries that do not provide an adequate level of personal data protection, the Controller will only carry out such transfer provided that the legal requirements for this are met (e.g. the conclusion of standard contractual clauses, your consent to such transfer, etc.). You will also be informed of such transfers.

How long do we keep your personal data?

We will only retain your personal data for as long as is necessary to fulfil the purposes of processing your personal data as described above.

We estimate that the processing activities with personal data for the purposes set out above will require the retention of personal data for the following periods:

Účel	Trvanie
1. Conducting public opinion polls	3 years after the survey
2. Supporting the activities of the operator through marketing activities	We process your personal data for a period of 3 years from the date of your consent. After this period, your personal data will be deleted and disposed of. If you would like us to continue to send you our newsletter, you can re-grant your consent for this purpose via our website
3. Provision of training and other professional services	For the duration of the contract
4. Social networks - LinkedIn	3 years from the date of acquisition of the personal data
5. Purposes relating to the protection of legal or legitimate interests, legal claims, judicial or other decisions of public authorities	For the duration of the limitation period and one year thereafter (for claims made at the end of the limitation period)
6. HR and payroll	within a time limit within the meaning of generally applicable law (e.g. an employee's personal file 70 years after his birth)
7. Accounting and tax purposes	within a time limit within the meaning of generally binding legislation

The processing of your personal data is also necessary for the purposes of our legitimate interests under Article 6(1)(f) of the GDPR, namely for the purpose of:

- internal control and record keeping, in particular the recording of payments received and made, the recording and planning of changes, the control of the performance of our obligations, etc., where it is our legitimate interest to ensure and control the proper performance of all your and our obligations,
- statistics and reports, in particular for monitoring and other controlling and reporting purposes, where our legitimate interest is to monitor and maintain the effectiveness of our activities,
- to protect our legal claims (in other words, to defend our own legal claims in judicial, extrajudicial or enforcement proceedings) where our legitimate interest is to prevent damage,
- ensuring security and protection of property, where our legitimate interest is to ensure physical and IT security and also to protect our property; for this purpose, we may carry out

monitoring of certain premises and the use of electronic devices, information systems and IT infrastructure.

Security of data processing

In connection with the processing of your personal data, we declare that we have taken appropriate technical, organisational and personnel measures to ensure the protection of your personal data, including the continuous evaluation and updating of security measures to ensure the secure and safe processing of your personal data.

Rights of data subjects

You have the following rights in the context of the processing of your personal data:

- **the right of access to the personal data processed:** you have the right to obtain confirmation as to whether your personal data are being processed and, if so, the right to access the type of personal data and the conditions of processing by addressing a request to the data controller in this respect;
- **the right to request rectification or erasure of personal data** - by sending a request in this respect to the data controller, you have the possibility to request the rectification of inaccurate personal data, the completion of incomplete data or the erasure of your personal data in the event that:
 - (i) the data is no longer necessary for its original purpose (and there is no new lawful purpose),
 - (ii) the lawful basis for the processing is the consent of the data subject, the data subject withdraws his or her consent and there is no other lawful basis,
 - (iii) the data subject exercises his or her right to object and the controller does not have overriding grounds for continuing the processing,
 - (iv) the data have been unlawfully processed,
 - (v) erasure is necessary to comply with EU law or the law of the Slovak Republic,
- **the right to request restriction of processing** - you have the right to obtain restriction of processing in cases where:
 - (i) you consider your processed data to be inaccurate and therefore the processing will be limited to a period that allows the controller to verify the accuracy of the personal data;
 - (ii) your processing is unlawful, but you do not want us to erase your personal data, you only want us to restrict its use;
 - (iii) where the data controller no longer needs your data for the aforementioned purposes, but you require the data to establish, exercise or defend a legal claim; or
 - (iv) you have objected to processing which is expected to verify whether the data controller's legitimate grounds override those of the data subject;
- **the right to withdraw consent to the processing of personal data** where the processing is based on consent, whereby the withdrawal of consent does not affect the lawfulness of the processing carried out up to that point; if you wish to withdraw your consent to the processing of personal data previously provided to us, you may do so at any time by sending a request to produkcia@produkcia.eu, or you may use the same method for withdrawing your consent as you used to provide us with your consent to the processing of your personal data;

- **the right to object to processing** on grounds relating to a particular situation where the processing is based on our legitimate interests pursuant to Article 6(1)(f) of the GDPR or the processing is carried out in the public interest pursuant to Article 6(1)(e) of the GDPR , and the right to object at any time to the processing of data for direct marketing purposes, including profiling;
- **the right not to be subject to a decision based solely on automated processing**, including profiling, which has legal effects concerning the data subject or similarly significantly affects the data subject;
- **the right to data portability**, which means the right to receive your personal data that you have provided to the data controller in a structured, commonly used and machine-readable format and the right to transfer those data to another data controller where the processing is based on your consent or contractual performance and is carried out by automated means;
- the right to lodge an application for data protection proceedings with the Office for Personal Data Protection.

The exercise of these rights may take place at any time. When exercising these rights, we recommend that you use the form of an email message addressed to produkcia@produkcia.eu.

Updates/changes to this Privacy Policy

The Controller is entitled to amend or update this Privacy Policy as necessary at any time by publishing the updated version on its website.

In Bratislava, 1. 2. 2022.
