# Attachment to Privacy Policy

## **Records of Intermediary Activities**

According to Article 30(1) of the Regulation (EU) 2016/679 of the European Parliament and of the Council on the Protection of Natural Persons when processing personal data and on the free movement of such data (hereinafter referred to as the "Regulation")

1/ CONTROLLER'S DATA	
Controller's Name	SPIRAM s.r.o.
Company ID No.	36 668 125
Street, number, municipality and postal code, state	Priemyselná 444, 965 01 Ladomerská Vieska
Legal form	Spoločnosť s ručením obmedzeným ( <i>eq. to Limited</i> <i>Liability Company</i> )
Controller's statutory body (or	Jozef Hyriak
the person authorized to act on its behalf)	Ing. Maroš Hyriak
Contact details	Ing. Zdenka Bartošíková

ECONOMIC AND ACCOUNTING AGENDA		
Name of IS	Economic and Accounting Agenda IS / <b>IS9</b> /	
Purpose of personal data processing	The purpose of personal data processing is the processing of orders, incoming invoices and invoicing, contact with the bank, cash register management, providing for cash receipts and expenses, warehouse management, recording fixed assets (including automatic depreciation) and small assets, keeping single/double-entry bookkeeping of the business.	
	The Accounting Act No. 431/2002 Coll., as subsequently amended	
	The Act No. 222/2004 Coll. on Value Added Tax, as subsequently amended	
	The Act no. 18/2018 Coll on the Personal Data Protection and on changes and amendments to some acts	
	The Act No. 145/1995 Coll. on Administrative Fees, as subsequently amended	
	The Act No. 40/1964 Coll. on the Civil Code, as subsequently amended	
Legal Basis	The Act No. 152/1994 Coll. on the Social Fund and on changes and amendments to the Act No. 286/1992 Coll. on Income Taxes, as subsequently amended	
	The Act no. 311/2001 Coll. the Labour Code, as subsequently amended	
	The Act No. 55/2017 Coll. on the Civil Service and on changes and amendments of certain acts, as subsequently amended	
	The Act No. 513/1991 Coll. on the Commercial Code, as subsequently amended	
	The Act No. 583/2004 Coll. on Budgetary Rules of Territorial Self-Government and on changes and amendments to certain acts	

Categories of recipients	Competent tax authorities, the Financial Directorate and other pur relevant legal regulations, Intermediary for accounting processing, Auditors Authorised staff Lawyers	ublic authorities according to the	
Deadlines	Auditor's reports, Annual reports, Financial plans	10 years	
for persona data	Billing/Invoicing	10 years	
deletion (the time	Internal documents	10 years	
periods specified are	Cashier	10 years	
according to the Record	Recovery of receivables	5 years	
Order)	Bank statements	10 years	
	Annual statistics	10 years	
	Statistics - monthly and quarterly	5 years	
	Financial statements	10 years	
Categories of Data Subjects	Suppliers and customers – Natural persons, self-employed Employees of suppliers and customers Representatives of suppliers and customers		
	- First name, surname, title		
	- Permanent residence		
	- Date of birth		
Categories	- Type and number of the ID document		
of personal data	- Temporary residence		
uuuu	- Phone number		
	- Email address		
	- Signature		
	- Bank account number of the natural person		
The Con	troller took appropriate personnel, organizational and technic 32(1) of the Regulation, in the form of	cal measures pursuant to Art.	
🕨 Ensi	uring the continued confidentiality, integrity, availability and resilience of pr	ocessing systems and services	
Abilities to incident	o restore the availability of and access to personal data in a timely mannel	r in case of physical or technical	
Processin	ng regular testing of the assessment and evaluation of the effectiveness of s to ensure the security of processing	f technical and organizational	
Informatio	n on the existence of automated decision-making, including profili	ng – <b>N/A</b>	
	Cross-border transfer of personal data – <b>N/A</b>		

RECOVERY OF RECEIVABLES	
Name of IS	Recovery of Receivables IS / <b>IS11</b> /
Purpose of personal data processing	The purpose of personal data processing within this agenda is to secure the claims from outstanding liabilities of debtors— i.e. recovery of receivables from debtors. This agenda also covers processing of personal data for the purpose of satisfying the creditor (i.e. the Controller) in full amount from the sending of reminders, invitations, submission of a motion to the competent court of the Slovak Republic or arbitration court, enforcement of a final decision by submitting an application for enforcement to a bailiff, filing for bankruptcy or restructuring, and next steps associated with the exercise of the claim for payment of the amount due.
Legal Basis	The Act No. 460/1992 Coll. Constitution of the Slovak Republic, as subsequently amended
	The Act No. 40/1964 Coll. on the Civil Code, as subsequently amended
	The Act No. 160/2015 Coll. Civil Dispute Procedure Code, as subsequently amended
	The Act No. 161/2015 Coll. Civil Non-contentious Procedure, as subsequently amended
	The Act No. 162/2015 Coll., the Code of Administrative Procedure, as subsequently amended
	The Act No. 300/2005 Coll. Criminal Code
	The Act No. 301/2005 Coll. Code of Criminal Procedure
	The Act No. 71/1967 Administrative Procedure Code
	The Act No. 233/1995 Coll. on Bailiffs and Enforcement of Activity (Enforcement Code ) and on changes and amendments to certain acts, as subsequently amended
	The Act No. 7/2005 Coll. on Bankruptcy and Research on Structuring and on changes and amendments and to certain acts
	The Act No. 153/2001 Coll. on the Public Prosecutor's Office, as subsequently amended
	The Act No. 372/1990 Coll. on Offences, as subsequently amended, Act No. 586/2003 Coll. on Advocacy and on changes and amendments to the Act No. 455/1991 Coll. on Trade Licensina (the Trade Licensina Act). as subsequently
	The Personal Data Protection Act and related legislation, as subsequently amended
Categories of	Lawyers / legal representatives
Recipients	Employees of the Controller
	Debtor and their legal representatives
	Intervener and other persons involved in the dispute
	Judicial authorities Bailiffs' offices
	State administration authorities, public authorities and public administration under applicable law Authorised personnel
Periods for deletion of personal data	3 to 10 years after the end of the contractual relationship with the client
Categories of data subjects	Debtors of the Collector
Categories of personal data	Name, surname, address of permanent residence or residence, date of birth or any other

The Controller took appropriate personnel, organizational and technical measures pursuant to Art. 32(1) of the Regulation, in the form of

- Ensuring the continued confidentiality, integrity, availability and resilience of processing systems and services
- Abilities to restore the availability of and access to personal data in a timely manner in case of physical or technical incident
- Processing regular testing of the assessment and evaluation of the effectiveness of technical and organizational measures to ensure the security of processing

Information on the existence of automated decision-making, including profiling – N/A

Cross-border transfer of personal data – N/A

#### **CONTRACTUAL RELATIONS**

Name of IS	Contractual Relations IS / <b>IS12</b> /	
Purpose of personal data processing	Monitoring compliance, procuring legal matters, reviewing and preparing contractual relations, transferring of assets, lease contracts, purchase contracts. Furthermore, it is frequenting the drafting of contracts within the framework of the supply of human – relations, exercising the right to fulfil obligations under contracts and property sanctions, rights to compensation for damage, etc.	
Legal Basis	The Act No. 40/1964 Coll. on the Civil Code, as subsequently amended The Act No. 513/1991 Coll. on the Commercial Code, as subsequently amended The Act No. 250/2007 Coll. on Consumer Protection and on Amendments to the Act of the Slovak National Council No. 372/1990 Coll. on offences, as subsequently Contracts concluded in accordance with the legal regulations above	
Categories of Recipients	State administration authorities, public autho	-
	Banks	The Act No. 483/2001 Coll. on Banks, as subsequently amended
	Insurance institutions	The 39/2015 Coll. on Insurance and on changes and amendment of certain acts, as subsequently amended
	Slovenská pošta a Courier Companies	The Act No. 324/2011 Coll. on Postal Services, as subsequently amended
	Suppliers	Contractual basis
	Courts, law enforcement authorities	The Act no. 160/2015 Coll. Code of Contentious Civil Procedure, as subsequently amended, The Act no. 161/2015 Coll. Code of Non-contentious Civil Procedure, as subsequently amended The Act no. 162/2015 Coll. the Code of Administrative Procedure, as subsequently amended The Act No. 301/2005 Coll. on the Code of Criminal Procedure, as subsequently amended
	Auditors of the financial statements	The Act No. 431/2002 Coll. on Accounting, as subsequently amended
	Intermediary: Auditors:	
	Lawyers:	

Periods for deletion of personal data	<ul> <li>Records of important contracts – Contracts with cities, contracts for real estate</li> </ul>	10 years
	Records of other contracts (Central Lists, Supplier, Customer, Consulting Contracts, Insurance Policies, Leasing Contracts, Investments, Loan Agreements, Leases, etc.)	10 years
	- Insurance claims	10 years
Categories of data subjects	- Contractual Party – Natural person	
Categories of personal data	<ul> <li>Contractual Party – Natural person</li> <li>Title</li> <li>Name</li> <li>Surname</li> <li>Date of birth</li> <li>Personal number</li> <li>Phone number</li> <li>Email address</li> <li>ID Card No.</li> <li>License plate</li> <li>Price</li> <li>Account no.</li> </ul>	
<ul> <li>The Controller took appropriate personnel, organizational and technical measures pursuant to Art. 32(1) of the Regulation, in the following form:</li> <li>Ensuring the continued confidentiality, integrity, availability and resilience of processing systems and services</li> <li>Abilities to restore the availability of and access to personal data in a timely manner in case of physical or technical incident</li> <li>Processing regular testing of the assessment and evaluation of the effectiveness of technical and organizational</li> </ul>		

measures to ensure the security of processing

Information on the existence of automated decision-making, including profiling – N/A

Self-employed Person Records	
Name of IS	Self-employed Person Records IS /IS14/
Purpose of personal data processing	The purpose of personal data processing within the framework of the agenda is to prepare and manage the supplier and clients relations with the self-employed persons. The agenda framework includes contractual relations, invoices and orders, records of deliveries and goods, services, etc.
Legal Basis	Contract between the Controller and a self-employed person authorized by the Constitution of the Slovak Republic, the Civil Code, the Commercial Code The Act No. 455/1991 Coll., the Trade Licensing Act and any relevant legislation

Categories of Recipients	State administration authorities, public authorities and public administration authorities under applicable legal regulations Auditors Authorised personal Lawyers	
Deadlines for deleting personal data	<b>ersonal</b> 10 years after the end of the contractual relationship due to registration within the accounting	
Categories of data subjects Customer/supplier – self-employed person		
Categories of personal data - Name, surname, title - Address, place of residence - Date of birth - Bank – account number - Contact details		
The Controller took appropriate personnel, organizational and technical measures pursuant to Art. 32(1) of the Regulation, in the following form:		
<ul> <li>Ensuring the continued confidentiality, integrity, availability and resilience of processing systems and services</li> <li>Abilities to restore the availability of and access to personal data in a timely manner in case of physical or technical incident</li> <li>Processing regular testing of the assessment and evaluation of the effectiveness of technical and organizational measures to ensure the security of processing</li> </ul>		
Information on the existence of automated decision-making, including profiling – <b>N/A</b>		

REPRESENTATIN	ES OF SUPPLIERS AND CUSTOMERS RECORDS	
Name of IS	Registration of Representatives of Suppliers and Customers IS /IS15/	
Purpose of personal data processing	The purpose of personal data processing within agenda framework is the management of representative, employee, supplier and customer databases due to performance of their work, service and functional duties and ensuring smooth supplier and customer relations.	
Legal Basis	Legitimate interest within the meaning of Article 6(1f) of the GDPR. The main legitimate interest is to ensure contacts within the trouble-free flow of business relations, as well as the application of S. 78(3) of the Act no. 18/2018 Coll. on the Personal Data Protection and on changes and amendments to certain acts.	
Categories of Recipients	Auditors Authorised personnel Lawyers	
Deadlines for deleting personal data	Within 30 days following the date of termination the supplier and consumer relations	
Categories of data subjects	Natural person – Representatives / Employees of the supplier, customer	
Categories of personal data	<ul> <li>Name, surname, title</li> <li>Occupational, functional or professional classification</li> <li>Employee's personal number</li> <li>Employee number</li> <li>Department</li> <li>Place of work</li> <li>Phone number</li> <li>Fax number</li> <li>Email address to the workplace</li> <li>Identification data of the employer</li> </ul>	

The Controller took appropriate personnel, organizational and technical measures pursuant to Art. 32(1) of the Regulation, in the following form:

- Ensuring the continued confidentiality, integrity, availability and resilience of processing systems and services
- Abilities to restore the availability of and access to personal data in a timely manner in case of physical or technical incident
- Processing regular testing of the assessment and evaluation of the effectiveness of technical and organizational measures to ensure the security of processing.

Information on the existence of automated decision-making, including profiling – N/A

Cross-border transfer of personal data – **N/A** 

Client Records		
Name of the IS	Client Records IS / <b>IS18</b> /	
Purpose of personal data processing	In the Information System, personal data of natural persons – clients as registered clients when ordering services or goods provided by the Controller is processed in order to keep records of clients and its contact lists.	
Legal Basis	The consent of the data subject under Article 6(1a) of the Regulation and the Act on the Protection of Personal Data, while the data subject has the right to withdraw their consent at any time. Withdrawal of consent shall not affect the lawfulness of processing based on the contents prior to its withdrawal.	
Categories of Recipients	State administration authorities, public authorities and public administration authorities under the relevant public authorities Authorised personnel Lawyers Auditors	
Deadlines for deleting personal data	Client records – 5 years	
Categories of data subjects Natural persons - Clients		
Categories of personal data       Title, name and surname         Email address       Phone		
The Controller took appropriate personnel, organizational and technical measures pursuant to Art. 32(1) of the Regulation, in the following form:		
<ul> <li>Ensuring the continued confidentiality, integrity, availability and resilience of processing systems and services</li> <li>Abilities to restore the availability of and access to personal data in a timely manner in case of physical or technical incident</li> <li>Processing regular testing of the assessment and evaluation of the effectiveness of technical and organizational measures to ensure the security of processing</li> </ul>		
Information on the existence of automated decision-making, including profiling – <b>N/A</b>		
Cross-border transfer of personal data – <b>N/A</b>		

### **CONTRACTUAL RELATIONS – CLIENTS – NATURAL PERSONS**

Name of IS

Contractual Relations IS - Clients - Natural persons /IS19/

Purpose of personal data processing	In the Information System, personal data of natural persons – clients when ordering services or goods provided by the Controller on the basis of orders (by phone, email, via the order form on the website) are processed	
Legal Basis	The contractual relationship between the Controller and the customer established by the confirmed order or a contract within the scope of business of the Controller, authorized by the Constitution of the Slovak Republic, the Civil Code, the Commercial Code The Act No. 455/1991 Coll., the Trade Licensing Act and related legislation. /Article 6(1b) / Processing of Personal Data of Natural Persons – Clients is necessary to perform the subject of the contractual relationship, where the data subject – the client is a contractual party	
Categories of Recipients	State administration authorities, public authorities and public administration authorities under applicable law Auditors Authorised personnel Lawyers	
Periods for deletion of personal data	Records of clients (invoices, orders, complaints)	5 – 10 years
Categories of data subjects	Natural persons - Clients	
Categories of personal data	<ul> <li>Name, surname</li> <li>Address</li> <li>Phone number</li> <li>Email</li> </ul>	
The Controller took appropriate personnel, organizational and technical measures pursuant to Art. 32(1) of the Regulation, in the following form:		
Ensuring the continued confidentiality, integrity, availability and resilience of processing systems and services Abilities to restore the availability of and access to personal data in a timely manner in case of physical or technical incident		

Processing regular testing of the assessment and evaluation of the effectiveness of technical and organizational measures to ensure the security of processing

Information on the existence of automated decision-making, including profiling - N/A

PUBLICATION OF CONTRACTS		
Name of IS	Contract Publication IS / <b>IS20</b> /	
Purpose of personal data processing	The purpose of personal data processing within the framework of the contract publication agenda is the performance of obligations arising from the Act No. 211/2000 Coll. on Free Access to Information and on changes and amendments to some acts, as subsequently amended.	
Legal Basis	The Act No. 211/2000 Coll. on Free Access to Information and on changes and amendments to certain acts, as subsequently amended.	
Categories of Recipients	State administration authorities, public authorities and public administration authorities under applicable law, especially the Ministry of Education, Science, Research and Sport of the Slovak Republic, self-governing regions, relevant professional organisations or relevant professional organisations Public	
Periods for deletion of personal data		
Categories of data subjects	Authorised persons and employees of the contracting party compulsory publishing contracts (hereinafter referred to as the "Data Subject")	

Categories of personal data

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Name, surname, position, contact details of the person and/or employee acting on behalf of the data subject

The Controller took appropriate personnel, organizational and technical measures pursuant to Art. 32(1) of the Regulation, in the following form:

- Ensuring the continued confidentiality, integrity, availability and resilience of processing systems and services
- Abilities to restore the availability of and access to personal data in a timely manner in case of physical or technical incident
- Processing regular testing of the assessment and evaluation of the effectiveness of technical and organizational measures to ensure the security of processing

Information on the existence of automated decision-making, including profiling - N/A

RECORDS OF COMPLAINTS		
Name of IS	Records of Complaints IS / <b>IS21</b> /	
Purpose of personal data processing	Records of complaints for the purposes of their application and handling.	
Legal Basis	Fulfilment of legal obligations of the Controller arising from special legal regulations, namely: The Act No. 40/1964 Coll. on the Civil Code, as subsequently amended	
	The Act No. 513/1991 Coll. on the Commercial Code, as subsequently amended	
	The Act No. 250/2007 Coll. on Consumer Protection and on changes and amendments to the Act of the Slovak National Council no. 372/1990 Coll. on Offenses, as subsequently amended, Contracts concluded in accordance with the legislation above.	
Categories of	Employees of the Controller	
Recipients	State administration authorities, public authorities and public administration authorities in accordance with the relevant legislation Authorised personnel	
Periods for deletion of personal data	5 years	
Categories of data subjects	The clients of the Controller exercising their rights to make a complaint	
Categories of personal data	<ul> <li>Name, surname, position, contact details of the person and/or employee acting on behalf of the data subject</li> </ul>	
The Controller too	k appropriate personnel, organizational and technical measures pursuant to Art. 32(1) of the Regulation, in the following form:	
<ul> <li>Abilities to restore the incident</li> <li>Processing regular te</li> </ul>	ed confidentiality, integrity, availability and resilience of processing systems and services e availability of and access to personal data in a timely manner in case of physical or technical esting of the assessment and evaluation of the effectiveness of technical and organizational the security of processing	
Information on the e	existence of automated decision-making, including profiling – <b>N/A</b>	
	Cross-border transfer of personal data – <b>N/A</b>	

CCTV MONITORING PREMISES ACCESSIBLE TO PUBLIC	
Name of IS	CCTV System Monitoring Areas Accessible to the Public IS / <b>IS22</b> /
Purpose of personal data processing	The purpose of personal data processing within the agenda framework is to monitor the premises accessible to public in order to protect property and health.
Legal Basis	Legitimate interest within the meaning of Article 6(1f) of the GDPR. The main interest is to protect the property and safety of the Controller and the data subjects
Categories of Recipients	Public authorities under the relevant legislation
	Insurance institutions
	Police
	Auditors
	Authorised personnel
	Lawyers
Periods for deletion personal data	15 days after the day when the record was made
Categories of data subjects	Natural persons who entered the premises of the Controller which are accessible to the public
	The public
Categories of personal data	Image recording

The Controller took appropriate personnel, organizational and technical measures pursuant to Art. 32(1) of the Regulation, in the following from:

- Ensuring the continued confidentiality, integrity, availability and resilience of processing systems and services
- Abilities to restore the availability of and access to personal data in a timely manner in case of physical or technical incident
- Processing regular testing of the assessment and evaluation of the effectiveness of technical and organizational measures to ensure the security of processing

Information on the existence of automated decision-making, including profiling - N/A

Cross-border transfer of personal data - N/A

#### RECORDS OF DOCUMENTS FOR OBTAINING PERMITS FOR PERFORMANCE OF THE CONTROLLER'S SUBJECT ACTIVITIES

Name of IS	Records of documents for obtaining permits for the performance of the Controller's subject activities / <b>IS26</b> /
Purpose of personal data processing	The purpose of the processing of personal data under this agenda is to record the relevant documents necessary for the proper performance of the subject activities, to obtain permits, certificates and licences issued /granted by competent authorities/.
Legal Basis	Applicable regulations in the given area – fulfilment of obligations stipulated by applicable Slovak legal regulations

Categories of Recipients	Lawyers State administration authorities, public authorities and public administration authorities under applicable law Auditors Registry Courts Applicable District Authorities (Trade Register of the SR) Authorised personnel
Periods for deletion of personal data	Not specified in the registry standards of the Controller
Categories of data subjects	Employees Partners Responsible persons
Categories of personal data	Issuer of the document / certificate Identification data of the issuer of the document / certificate Name, surname and signature of the issuer of the document / certificate Document / certificate data
<ul> <li>Ensuring the continu</li> <li>Abilities to restore th incident</li> <li>Processing regular to</li> </ul>	ok appropriate personnel, organizational and technical measures pursuant to Art. 32(1) of the Regulation, in the following form: red confidentiality, integrity, availability and resilience of processing systems and services e availability of and access to personal data in a timely manner in case of physical or technical esting of the assessment and evaluation of the effectiveness of technical and organizational the security of processing
Information on the e	xistence of automated decision-making, including profiling – <b>N/A</b>
	Cross-border transfer of personal data – <b>N/A</b>

RECORDS OF JOB SEEKERS	
Name of IS	Registration of Job Seekers IS / <b>IS27</b> /
Purpose of personal data processing	The purpose of managing the job seekers database who sent their applications to the Controller, voluntarily, based on the job interview or without a job interview with the possibility to be contacted regarding the job interview in the future if the Controller does not have any suitable job position or if other job seeker was hired
Legal Basis	Consent of the data subject under Article 6(1a) of the Regulation and the Personal Data Protection Act, where the data subject has the right to withdraw their consent at any time. Their consent withdrawal shall not affect the lawfulness of processing based on the consent prior to its withdrawal.
Categories of Recipients	Authorised Personnel IT Admin

Periods for deletion personal data	<ol> <li>year from the date of sending the job application based on the job interview</li> <li>year following the day of sending the job application and the consent to the personal data processing and their consent to the processing and keeping records of personal data out of the job interview</li> <li>days after sending the job application without consent to the processing and registration of personal data out of the job interview</li> </ol>
Categories of data subjects	Job seekers
Categories of personal data	Data provided in the CV, cover letter and any others after requested document confirming the required qualification, in particular name, surname, name at birth title, education, work experience, employment, job title, function, course of previous occupations, date of birth, place of birth, district of birth, permanent residence, temporary residence, previous residence, marital status, contact – by phone, email, ID card or any travel document number, any other identification data, extract from the Criminal Record, certificate on education acquired within the specialization
Ensuring the continu	ok appropriate personnel, organizational and technical measures pursuant to Ar 32(1) of the Regulation, in the following form: ned confidentiality, integrity, availability and resilience of processing systems and services e availability of and access to personal data in a timely manner in case of physical or technical
	esting of the assessment and evaluation of the effectiveness of technical and organizational the security of processing
Information on the ex	kistence of automated decision-making, including profiling – <b>N/A</b>