

PRIVACY POLICY

pursuant to Articles 13 and 14 of Regulation 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, and repealing Directive 95/46/EC (GDPR)

We would like to briefly inform you about the processing of your personal data. We process your personal data in accordance with the GDPR and the relevant provisions of Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments to Certain Acts, as amended (hereinafter referred to as the "**Personal Data Protection Act**").

This information does not concern the personal data of legal entities, including the name, legal form and contact details of the legal entity, but on the other hand it concerns the contact details of the authorized representatives of these legal entities whose personal data the Controller processes.

1. WHO IS THE CONTROLLER OF YOUR PERSONAL DATA?

The controller who has determined the purposes and means of processing your personal data is:

Cavo Automotive Slovakia s.r.o., with its registered office at Dolné Hony 9, 949 01 Nitra, ID No. 36 553 387, registered in the Commercial Register of the District Court Nitra, Section Sro, Insert No. 13964/N (hereinafter referred to as the "**Operator**" or also as the "**Company**").

2. WHO CAN I CONTACT IF I HAVE ANY QUESTIONS?

We care about the protection of your privacy, and therefore allow us to provide you with information in particular about how our Company processes your personal data, what personal data for what purposes and on what legal bases, what rights are granted to you in the field of protection of the processing of your personal data, to whom your personal data may be provided or made available and other important information.

If you have any questions about the protection of your personal data, you can contact us at any time using the contact details provided or you can write to us at the address of our registered office.

Contact details:
gdpr@cavo.eu

3. DEFINITIONS

"**PD**" means personal data (including plural);
"**DO**" means the data subject (including plural);

4. IN WHAT SITUATIONS WILL THE CONTROLLER PROCESS YOUR DATA?

We process your personal data without your consent only in cases where the applicable legal regulations allow us to do so. You must provide us with the PD that you provide to us on the basis of a contract, a special regulation or on the basis of a legitimate interest, otherwise we will not be able to fulfil your or our obligations determined for the given purpose.

Without your consent, we process your personal data only in the following cases and on the basis of the following legal bases:

PURPOSE OF PERSONAL DATA PROCESSING	LEGAL BASIS	RETENTION PERIOD
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If you are a job seeker, we process your PD to the extent of common data, in particular identification and contact data and other data that you have provided to us as part of your CV, cover letter, interview, for the purpose of:

Records of job seekers for the purpose of organizing, implementing and evaluating the selection procedure to fill a vacant position (so-called pre-contractual relations).	Article 6(1)(b) GDPR - Fulfilment of pre-contractual relations with the job seeker as the data subject	one month after the end of the selection procedure, provided that the deletion does not conflict with any other legitimate interests of our company
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If you are a visitor to our workplace, or other persons whose personal data we are obliged to process in connection with measures to prevent the spread of COVID-19, we process your personal data to the extent of common data and a special category of personal data (data related to health), for the purpose of:

Fulfilling the Company's obligations in the fight against the spread of COVID-19 in accordance with the relevant state measures and related legislation.	Article 6(1)(f) GDPR - exercise of the legitimate interest of the Controller in the fulfilment of legal obligations in connection with the measures of the competent state authorities in the fight against the spread of COVID-19, while the data subjects can reasonably expect such processing of PD due to the current situation and their processing is only temporary	PDs are not stored in the case of viewing "covid certificates" or other established documents.
	... in conjunction with the derogation from the prohibition:	In the event that we store PD, the retention period will be set for the necessary period necessary to prove the fulfilment of the Company's obligations, or within the specified statutory periods.
	Article 9(2)(i) GDPR – processing is necessary for reasons of public interest in the field of public health, or	
	Article 9(2)(b) GDPR – enabling the processing of data related to health status for the exercise of special rights in the field of labour law, so that the employer can fulfil its obligations in preventing health threats in exceptional conditions due to the spread of COVID-19.	

If you are a supplier, customer or a person authorized by a supplier or customer, we process your PD in the scope of common data, in particular identification, contact and invoicing data, for the purpose of:

Fulfilment of obligations arising from accounting regulations, management of accounting agenda, management of accounting documents.

Article 6(1)(c) GDPR – fulfilment of the Operator's legal obligations arising from special legal regulations.

Statutory time limits (10 years)

If you are DO relevant for the performance of contractual relationships between suppliers and customers, we process your PD in the scope of common data, in particular contact data and identification data, for the purpose of:

Article 6(1)(b) GDPR – fulfilment of contractual and pre-contractual relations (if the contracting party is a natural person himself)

Fulfilment of rights and obligations arising from contractual relationships with suppliers / customers of the Operator.

Article 6(1)(f) GDPR - processing is necessary for the purposes of the legitimate interests of the Controller, if the Contracting Party is a legal entity and other natural persons act on its behalf for the purpose of fulfilling contractual relations on the basis of a special authorisation, or if the natural person who is a Contracting Party is represented by another natural person, so that the Controller can fulfil contractual and pre-contractual relationships, while the data subjects can reasonably expect such processing.

until the termination of the contractual relationship and until the expiry of the applicable limitation, prescription, complaint, retention and other similar periods stipulated by legal regulations or agreements of the contracting parties, until the expiry of the last of these periods (but not more than 10 years)

If you are the recipient or sender of our correspondence, we process your PD in the scope of common data, in particular contact details, including the subject of correspondence, for the purpose of:

Keeping records of received and sent correspondence, including electronic correspondence.

Article 6(1)(c) GDPR – fulfilment of the Controller's legal obligations arising from special legal regulations (in particular Act No. 395/2002 Coll. on Archives and Registries and on Amendments to Certain Acts, as amended).

Statutory Archiving Periods for Important Documents

If you are an individual exercising your rights as a data subject under the GDPR, we process your personal data to the extent of common data, in particular contact data and identification data, for the purpose of:

Exercising the rights of data subjects and fulfilling other obligations under the GDPR.

Article 6(1)(c) GDPR – fulfilment of the Controller's legal obligations arising from special legal regulations;
Art. Article 6(1)(f) of the GDPR

5 years - objective period for inspection by the Office for Personal Data Protection

the processing is necessary for the purposes of the legitimate interests of the Controller to comply with the obligations imposed on it by the GDPR, and the DO may reasonably expect such processing

If you are DO relevant for the purpose of ensuring network security, we process your PD in the scope of common data, in particular data obtained from networks, for the purpose of:

Ensuring network and other security of the Controller for the protection of processed data.	<p>Article 6(1)(f) GDPR - processing is necessary for the performance of the legitimate interest of the Controller.</p> <p><i>Legitimate interest of the Controller in ensuring security - the obligation under the GDPR to implement appropriate security measures.</i></p>	5 years (objective period of the Office for Personal Data Protection)
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If you are a natural person entering the monitored area of the Controller, we process your personal data in the scope of common data such as video recording, or video recording, and related possible manifestations of a personal nature, for the purpose of:

Monitoring the premises of the production hall and the parking lot in its area for the purpose of protecting public order and security, detecting crime, protecting property, life and health of the Operator, employees and other persons who are lawfully in the monitored area or their property is lawfully located there.	<p>Article 6(1)(f) GDPR - processing is necessary for the performance of the legitimate interests of the Controller in order to fulfil the purpose pursued by the Controller, while the data subjects can reasonably expect monitoring in the premises used for the performance of the Controller's business activities</p>	7 days (automatic lubrication)
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We may also process your PD on the basis of your consent, which we may ask you for in each such operation. Providing consent is voluntary, i.e. it is up to you to decide whether you provide us with the PD or not. If you give us your consent, you can then revoke it at any time.

Only with your consent can we process your personal data in the following cases:

PURPOSE OF PERSONAL DATA PROCESSING	LEGAL BASIS	RETENTION PERIOD
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Provision of consent by the data subject pursuant to Article 6(1)(a) of the GDPR

If you are an unsuccessful job seeker, but we would like to keep your CV and other relevant data that we have collected about you during the selection procedure, we process your personal data to the extent of common data, for the purpose of:

Records of unsuccessful job seekers for the purpose of contacting them even after the end of the selection procedure, in the event that a suitable job for an unsuccessful applicant becomes available to the Operator.	approval	for a maximum period of one year from the granting of consent
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If you are a job seeker who approaches us outside the announced selection procedure, we process your personal data to the extent of the usual data you provide to us (CV, cover letter, or cover letter and basic identification, contact data), for the purpose of:

Records of job seekers who apply outside the announced selection procedure, so that the Operator can process their data and address them with a job offer, in the event that a suitable job vacancy for such an applicant becomes available.

approval

for a maximum period of **one year from the granting of consent**

You are under no obligation to provide this consent to the Operator. You cannot be at risk of any harm in connection with the non-provision or withdrawal of consent.

5. WHAT PERSONAL DATA DO WE PROCESS ABOUT YOU?

In particular, we process common **personal data** about you, which you provide to us or we obtain from other sources, electronically via e-mail communication, by post or by other means.

We process a special category of PD, the so-called sensitive PD, about you only as part of the fulfilment of our obligations in the context of anti-epidemiological measures, which we base on the relevant legal basis in conjunction with the relevant exception to the prohibition of processing sensitive data under Article 9(2) of the GDPR.

6. FOR HOW LONG WILL WE PROCESS YOUR PERSONAL DATA?

We will immediately delete your PD after the specified deadlines, unless we have another legal basis for their further storage.

We store your PD no longer than it is necessary for the purposes for which PD is processed. When storing PD, we are governed by special regulations that set storage periods and/or the basic principles of the GDPR regarding the storage and disposal of PD. If you have provided us with your data on the basis of consent, we will process them only for the period of validity of the consent or only until its withdrawal.

7. WHAT SOURCES DOES THIS INFORMATION COME FROM?

The personal data that we process about you comes from you and that you have provided to us, such as in connection with the conclusion of a contract, or you have communicated them to us in the course of our cooperation.

We may process personal data about you that we have received from another source, which may be, for example, your employer or another person.

If the PD does not come from the data subject and you provide it to us for the performance of one of the purposes, you are obliged to inform the data subjects whose PD you have provided to us about the facts of their processing by the Controller in accordance with the GDPR.

8. WHO IS THE RECIPIENT OF PERSONAL DATA

We provide your PD only in justified cases and only to the extent necessary to the following categories of recipients:

- our contractual partners, whom we need for our normal functioning and implementation of the contractual relationship as an IT support provider, a service company for the camera system,

ad hoc recruitment agencies, portals such as ISTP, Profesia, Kariera (in the case of looking for new employees), a provider of legal services, and for administrative purposes within the CAVO OTOMOTIV group.

- other entities in cases where the right or obligation to provide your personal data is imposed on us by law or if it is necessary to protect our legitimate interests (e.g. courts, the Police, etc.).

Your PD may also be provided to other entities if we believe that such provision of PD is:

- in accordance with generally binding legal regulations, the Personal Data Protection Act or the GDPR; or
- it is necessary for the purposes of exercising, establishing or defending a legal right/claim of our company, or
- It is necessary to protect the important interests of our company or the important interests of another person.

We may also provide your PD to other recipients if you give us your consent to such provision or instruct us to provide your PD in such a way.

9. AUTOMATED DECISION-MAKING AND PROFILING

Your PD is not and will not be used for automated individual decision-making or profiling.

10. EXISTENCE OF AN INTRA-COMPANY TRANSFER OF A NB AND A TRANSFER OF AN IP TO THIRD COUNTRIES

As we are part of the CAVO OTOMOTIV group of enterprises and our parent company is CAVO OTOMOTIV TİC. İN SAN. A.Ş. conducting business activities in the Republic of Turkey, we may also transfer personal data to the Republic of Turkey.

The Operator is part of the CAVO family group of companies with interconnected economic interests and ownership structure, therefore it has **a legitimate interest in the transfer of the PD DO** within the meaning of recital 48 in conjunction with recital 37 of the GDPR, in particular for the purposes of corporate control, internal communication and for other administrative purposes, reporting (e.g. accounting, statistics, human resources and payroll, career development, supplier-customer relations) to the extent necessary while complying with the conditions of safe Transfer.

The Republic of Turkey is a third country that does not provide an adequate level of protection of personal data. Therefore, when transferring personal data, we will comply with all the conditions set out in Articles 44 to 49 of the GDPR, as well as other conditions of the GDPR, so that this transfer meets all security standards and that your rights and freedoms are not violated, **by means of standard contractual clauses** that govern the conditions of this transfer and are part of the contract with the parent company from a third country.

11. WHAT RIGHTS DO YOU HAVE WHEN PROCESSING YOUR PERSONAL DATA?

- **right of access** – you can ask us for access to the PD that we process about you. The Controller shall also provide a copy of the PD processed.
- **right to rectification** – you can ask us to rectify inaccurate or incomplete personal data that we process about you.
- **right to erasure** - you can ask us to delete your PD if any of the following situations occurs:
 - (i) PD are no longer necessary for the purposes for which they were collected or otherwise processed;

- (ii) Your PD has been processed illegally;
 - (iii) Your PD must be deleted in order to comply with a legal obligation laid down in Union or Member State law to which the Controller is subject.
 - **right to restriction of processing** - you can ask the Controller to restrict the processing of your PD if any of the following situations occurs:
 - (i) you have denied the accuracy of the PD for the time necessary for the Operator to verify the accuracy of the PD;
 - (ii) the processing of your PD is unlawful, but you oppose the deletion of this data and instead request the restriction of their use;
 - (iii) the controller no longer needs the PD for the purposes of processing, but you require it for the establishment, exercise or defence of legal claims;
 - (iv) you have objected to the processing of your personal data pursuant to Article 21 (1) of the GDPR until it is verified that the legitimate reasons of the Controller outweigh your legitimate reasons.
 - **the right to data portability** – if we process your PD on the basis of your consent or because it is necessary for the performance of a contract to which you are a party, and at the same time it is processing by automated means of processing, you have the right to obtain the PD that you have provided to the Controller in a structured, commonly used and machine-readable format with it, that this right must not adversely affect the rights and freedoms of others.
- **Right to withdraw consent** – if the processing of your PD is based on consent, you have the right to withdraw your consent to the processing of PD for the purpose for which you have given your consent at any time.
 - **right to object** – you can object at any time to the processing of your PD by the Controller for the purposes of direct marketing carried out on the basis of the Controller's legitimate interest and whenever we process your PD on the basis of a legitimate interest or public interest, including profiling.
- **the right to lodge a complaint** – you have the right to lodge a complaint with the supervisory authority, which is the Office for the Protection of the District Office of the Slovak Republic, <https://dataprotection.gov.sk/sk/>.

12. HOW CAN THE DATA SUBJECT EXERCISE HIS OR HER RIGHTS?

The data subject may exercise his/her rights orally, in writing or electronically, via the contact details provided above. We will provide you with information about the measures taken on the basis of your request without undue delay, no later than one month after receipt of your request. The controller may request the provision of additional information necessary to confirm the identity of the data subject if it has reasonable doubts as to the identity of a natural person who has exercised his or her rights through a request for the exercise of the data subject's right. It is the Operator's duty to prevent the provision of PD to an unauthorised person. In the event that we need to extend the deadline in justified cases, we will inform you in time. If a request for the exercise of the rights of the data subject would be manifestly unfounded or disproportionate, in particular due to its repetitive nature, we may refuse to process your request or we may require you to pay a reasonable fee taking into account our administrative costs of handling it.