

## Conditions and information on personal data processing – Cameras

eGroup Solutions, a. s., Plynársená 7/B, 821 09 Bratislava – mestská časť Ružinov, CIN: 44 989 709, established in accordance with the legal regulations of the Slovak Republic, kept in the Commercial Register of the Municipal Court Bratislava III, Section Sa, Entry No. 4875/B ("eGroup Solutions, a. s.") as the controller obtains and processes personal data of data subjects, to whom it hereby provides information in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27.04.2016 on the protection of individuals with processing personal data and on the free movement of such data, repealing the Directive 95/46/EC ("GDPR") and with regard to the Act No. 18/2018Coll. on the protection of personal data and on the amendment of certain acts ("APPD").

### Right to object against personal data processing

You can object to processing of your personal data, which is based on our legitimate interests, at any time, without stating the reasons. We need to properly assess the objection. If we do not show that we have the necessary legitimate reasons for processing your personal data and that these prevail over your interests, rights and freedoms, we will not process your personal data further.

You can send your objection in writing to: eGroup Solutions, a. s., Plynársená 7/B, 821 09 Bratislava – mestská časť Ružinov, or by e-mail to dpo@egroup.sk.

Depending on the type of Parties relationship with the controller, the table below sets out the purposes of personal data processing (the "PD"), from which the category of data subjects is obvious, the legal basis for their processing, the categories of processed PD, as well as the time for which the controller will process the PD.

Data subjects	Purpose of personal data processing	Legal basis for the processing of personal data	Processing time	Recipients
a natural person recorded on a record from a camera device	<b>MONITORING PREMISES FOR THE PROTECTION OF PROPERTY, LIFE AND HEALTH</b>  <b>Note:</b> the purpose is to monitor by video intercom for the purpose of controlling persons entering the controller's premises and for the protection of property, life and health	<b>Article 6(1)(f) of the Regulation GDPR – LEGITIMATE INTEREST</b>  The legitimate interest of the controller is: control of persons located in the monitored area for the purpose of controlling entering persons, protection of the controller's property and prevention of damage by monitoring persons located in the monitoring area, i.e. in the area prior to access to the controller's premises in the corridor in front of the door on the 3rd floor.	live without recording (recording is only made when the ringer is ringing and is stored for 72 hours).	Entities to which the controller provides PD by law, professional consultants and advisers who are bound by legal and/ or contractual obligation of confidentiality
A natural person whose personal data are requested by public authorities	<b>PROVIDING PD TO PUBLIC AUTHORITIES UPON THEIR REQUEST</b>  <b>Note:</b> Provision of PD in case of request by public authorities e.g. if law enforcement authorities request the recording of cameras for the purpose of third party protection, i.e. for purposes other than those of the controller	<b>Article 6(1)(c) of the GDPR Regulation - necessary for meeting the LEGAL OBLIGATIONS</b> of the controller resulting from the Act No. 171/1993 Coll. On Police Forces, the Act No. 160/2015 Coll. Civil Dispute Code, the Act No. 372/1990 Coll. on offences	The application for the provision of personal data shall be kept for 10 years following the year to which it relates	Entities to which the controller provides PD by law, professional consultants and advisers who are bound by legal and/ or contractual obligation of confidentiality
a natural person recorded on a camera-device record for the purposes of the insurance agenda	<b>INSURANCE AGENDA</b>	<b>processing is within the meaning of Article 6(1)(f) of the GDPR Regulation – LEGITIMATE INTEREST</b>  The legitimate interest of the controller shall be: The controller wishes to process personal data in order to document the insured event.	10 years after the final conclusion of the relevant proceedings	Entities to which the controller provides PD by law, professional consultants and advisers who are bound by legal and/ or contractual obligation of confidentiality, Insurance company
A natural person with whom out-of-court settlement is conducted; natural person -	<b>COURT AND OUT-OF-COURT AGENDA</b>	<b>Article 6(1)(c) of the GDPR Regulation – necessary for meeting the LEGAL OBLIGATIONS</b> of the controller arising from the provisions of the Decree No. 160/2015 Coll. Civil Litigation	10 years after the final conclusion of the relevant proceedings/ou	Entities to which the controller provides PD by law, professional consultants and advisers who are bound by legal and/ or contractual

party to the proceedings, party to the dispute and other interested persons, statutory body or other person authorized to act on behalf of the party to the proceedings		order, the Act No. 244/2002 Coll. on arbitration, the Act No. 301/2005 Coll. Criminal order, the Act No. 7/2005 Coll. on bankruptcy and restructuring, the Act No. 314/2018 Coll. on the Constitutional Court of the Slovak Republic, the Act No. 162/2015 Coll. Administrative judicial order, the Act No. 233/1995 Coll. Enforcement order, the Act No. 307/2016 Coll. on enforcement proceedings and related legislation	t-of-court proceedings	obligation of confidentiality
Natural persons exercising their rights as data subjects	<b>AGENDA FOR DEALING WITH THE RIGHTS OF THE DATA SUBJECT</b>  (Records of exercised rights of data subjects under Chapter III of the Regulation 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data)	<b>processing is within the meaning of Art. 6 par. 1 letter c) of the GDPR necessary for meeting of the LEGAL OBLIGATIONS</b> of the controller arising from the GDPR and from the Act No. 18/2018 Coll. on the protection of personal data	5 years following the year in which the application was processed	Entities to which the controller provides PD by law, professional consultants and advisers who are bound by legal and/ or contractual obligation of confidentiality
Natural persons - senders and recipients of correspondence	<b>REGISTRY AGENDA, ADMINISTRATION OF THE REGISTRY, POST OFFICE RECORDS</b>	<b>Article 6(1)(c) of the GDPR Regulation – necessary for meeting the LEGAL OBLIGATIONS</b> of the operator arising from provisions of the Decree No. 395/2002 Coll. on archives and registries and on the addition of certain laws as amended and Act No. 305/2013 Coll. z on the electronic form of exercising the powers of public authorities and on the amendment and supplementation of certain laws (e-Government Act)	Ordinary correspondence - 5 years following the year to which they relate serious correspondence ; lists and protocols of records taken to the registry center - 10 years following the year to which they relate; filing diaries, decommissioning proposals, lists, decommissioning protocols, records of additions to the registration center - permanent archiving period postal books and other records of postal items - 3 years following the year to which they relate	Entities to which provision of personal data is required by law from the operator; professional consultants and advisors who are bound by legal and/or contractual confidentiality obligations; Microsoft company providing Office 365 services and cloud storage

eGroup Solutions, a. s. does not disclose personal data to any third parties other than those required by law or these personal data processing conditions. eGroup Solutions, a. s. by default, it does not transfer personal data to third countries (outside the European Union / European Economic Area). In the case of Microsoft providing company tools and applications of the Microsoft Office 365 operator, the transfer may take place to third countries, specifically to the USA. The operator has concluded standard contractual clauses with the mentioned company,

the text of which can be found here <https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>. eGroup Solutions, a. s. does not process personal data for the purposes of automated decision-making, including profiling.

In the event that for any of the purposes of processing, the legal basis for the processing of personal data is the performance of the contract, the provision of such data constitutes a contractual requirement for performance under the contract in question. In the absence of this information, it is not possible to enter into a contractual relationship or subsequent performance of obligations under the contract.

If the legal basis for the processing of personal data is the law (meeting of legal obligations), the provision of such data is a legal requirement. If this information is not provided, it is not possible to ensure proper meeting of eGroup Solutions, a. s.'s obligations arising from the relevant general legal regulations.

In relation to the processing of personal data, the data subject shall in particular have the following rights:

- 1) upon application, request from eGroup Solutions, a. s. confirmation of whether its PD are processed or not (**access to personal data**), under what conditions, including the scope, purpose and time of their processing, and information on the source of the personal data concerned;
- 2) upon application, request from eGroup Solutions, a. s. correction of incorrect or outdated personal data, or completion of incomplete personal data;
- 3) upon application, request from eGroup Solutions, a. s. **erasure/destruction of personal data** if:
  - a) personal data are no longer needed for the purpose for which they were obtained or otherwise processed,
  - b) in cases where personal data have been processed on the basis of consent and this consent to the processing of personal data has been revoked, there is no other legal basis for the processing of personal data or another legal exception;
  - c) if the data subject objects to the processing of personal data on grounds of legitimate interest and there are no legitimate reasons for the processing or the data subject objects to direct marketing;
  - d) personal data are processed illegally;
  - e) personal data must be deleted in order to comply with the legal obligation;
- 4) upon application, request from eGroup Solutions, a. s. restrictions on the processing of personal data if:
  - a) the data subject objects to the accuracy of the personal data during the period allowing eGroup Solutions, a. s. to verify the accuracy of personal data;
  - b) the processing of personal data is illegal and the data subject objects to the deletion of personal data and calls instead for restrictions on their use;
  - c) eGroup Solutions, a. s. no longer needs personal data for the purpose of processing personal data, but the data subject needs it to assert a legal claim;
- 5) For reasons relating to its particular situation, object to the processing of personal data relating to it, which is carried out either (A) because of the necessity of a public-interest task or (B) on grounds of the legitimate interest of eGroup Solutions, a. s. as the controller in the processing of personal data, including the objection to profiling based on those legal bases (in cases, where eGroup Solutions, a. s. would perform profiling on the basis of automated decision-making);
- 6) to file an **application for the opening of proceedings** at the Office for the protection of personal data of the Slovak Republic.

Applications for the above rights shall be made by the data subject entitled to its exercise at the controller's address, email - [dpo@egroup.sk](mailto:dpo@egroup.sk), in person or by post at the address of the controller. The subject of the e-mail and the letter should include: "Protection of personal data "Cameras".

Replies to those applications from the data subjects or measures taken on the basis of those applications shall be given free of charge. Where the application of the data subject is manifestly unfounded or disproportionate, in particular due to its repeated nature (repeated application), eGroup Solutions, a. s. has the right to charge a fee taking into account its administrative costs of providing information or a reasonable fee taking into account its administrative costs of notification, or to take the requested action or has the right to refuse to act on such an application.

In case of doubt about compliance with the obligations related to the processing of personal data, you can directly contact eGroup Solutions, a. s., i.e. the responsible person at the address eGroup Solutions, a. s., Plynárenská 7/B, 821 09 Bratislava, [dpo@egroup.sk](mailto:dpo@egroup.sk).

At the same time, you have the opportunity to file a complaint with the Office for Personal Data Protection of the Slovak Republic, with the registered office at Hraničná 12, 820 07 Bratislava 27, E-mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk), <https://dataprotection.gov.sk/>.

The current version of this document can be found at [www.egroup.sk](http://www.egroup.sk) and at the reception of the company.

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