
	KP-GDPR-SM-35 Annex no.4 Information policy of the data subject	Issue number: 1	Release date: 17.12.2018
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Information policy of the data subject (GDPR)


Controller – the company Kodaň Plast s.r.o. is responsible for the processing of personal data according to Regulation (EU) 2016/679 of the European Parliament and of the Council 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, and repealing Directive 95/46/EC (General Data Protection Regulation). This information policy explains in a transparent a clear manner the information referred to in Articles 13 and 14 of the GDPR.

- 1) **Personal Data Administrator** – Controller is company, which determines the purpose and means of processing personal data:
Company name: Kodaň Plast s.r.o.
Address: Bytčická 2, 01001Žilina
Organization ID: 50623460
Tax ID: 2120405276
VAT: SK2120405276
- 2) **Data subject** – natural persons, employees of the controller and their family members (the spouse of the staff of the controller, dependent children of employees, parents of dependent children of employees, close persons), job seekers, employees of customers and suppliers, individuals entering the building
- 3) **Categories of personal data**, which the controller processes: *common personal data* – (the name, date of birth, address - street, house number, post code, city, phone number, E-mail address, education data, data on the number of children, the photo, video recording) and *specific categories of personal data* (data revealing trade union membership, health claims)
- 4) **Processing of personal data purpose** (personal data shall not be further processed in a way incompatible with those purposes) and **the legal basis** for providing the data:

<i>Processing of personal data purpose</i>	<i>The legal basis</i>
OSH Agenda (foreign persons) - Evidence of lessons on occupational safety, records of accidents at work	Fulfillment of legal obligations (Art 6 sect.1 point. c) GDPR)
Agenda of board members (Ltd.) - The company provides the management of the agenda of members of the bodies of the company pursuant to Act No. 513/1991 Coll. from. The Commercial Code and Act no. 530/2003 Coll. from. about the business register	Fulfillment of legal obligations (Art 6 sect.1 point. c) GDPR)
Supplier Agendas - Business Purposes - registration and processing of business cases, contracts and related information	the legitimate interest (Art 6 sect.1 point. f) GDPR)
Client Agenda - Business Purpose – registration and processing of business cases, contracts and related information	the legitimate interest (Art 6 sect.1 point. f) GDPR)

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Client Agenda – Delivery - registration and processing, delivery of material / goods	the legitimate interest (Art 6 sect.1 point. f) GDPR)
Jobseekers' Agenda - personal data is used for the selection of new employees	Consent (Art 6 sect.1 point. a) GDPR)
Attendance system - records of attendance and overtime of employees, employees on agreement	Fulfillment of legal obligations (Art 6 sect.1 point. c) GDPR)
Administration of the registry	Fulfillment of legal obligations (Art 6 sect.1 point. c) GDPR)
Evidence of complaints	Fulfillment of legal obligations (Art 6 sect.1 point. c) GDPR)
Staff Photos - awareness related to the staffing and promotion of the organization	Consent (Art 6 sect.1 point. a) GDPR)
HR and wages-social. insurance company - contributions to the social insurance company	Fulfillment of legal obligations (Art 6 sect.1 point. c) GDPR)
HR and wages-health. insur. - contributions to the health insurance company	Fulfillment of legal obligations (Art 6 sect.1 point. c) GDPR)
HR and wages-tax - compliance with the obligation of Act no. 595/2003 Coll. from. on Income Tax, as amended	Fulfillment of legal obligations (Art 6 sect.1 point. c) GDPR)
HR and wages-OSH - registration of OSH and Fire Protection employees	Fulfillment of legal obligations (Art 6 sect.1 point. c) GDPR)
HR and wages-others - performance of an employer's employment-related obligations, a similar relationship (e.g. on the basis of employment agreements), including pre-contractual relationships	Fulfillment of legal obligations (Art 6 sect.1 point. c) GDPR)
Processing of accounting documents	Fulfillment of legal obligations (Art 6 sect.1 point. c) GDPR)
Protection of personal data - handling the rights / initiatives of data subjects, control findings, other in the sense of Act No. 18/2018 Coll. from. on the Protection of Personal Data	Fulfillment of legal obligations (Art 6 sect.1 point. c) GDPR)
Employees of suppliers - fulfillment of the obligations under Act no. 82/2005 Coll. from. on Illegal Work and Illegal Employment, and on Amendments to Certain Other Wording	Fulfillment of legal obligations (Art 6 sect.1 point. c) GDPR)
Legal agenda - registration and provision of legal agenda, resolution of civil, commercial, labor law matters, representation in legal disputes before courts, preparation of documents for proceedings, preparation and assessment of contracts, notification of legal opinions	Fulfillment of legal obligations (Art 6 sect.1 point. c) GDPR)
Tender-records used for the needs of the selection procedure for filling a job position	Fulfillment of the contract (Art 6 sect.1 point. b) GDPR)

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5) ***The period for which the personal data will be stored*** – Your personal data is processed for as long as necessary for the purposes for which the personal data are processed. We most often stop processing your personal data after:

- a) the expiry of the storage periods set by the Registry Plan for Registry Records containing your personal data and upon approval of the retirement procedure;
- b) the expiry of the maximum retention period of your personal data processed for a specific purpose, as defined in the internal policy governing the retention of your personal data processed for specific purposes;
- c) the full settlement of our mutual contractual obligations;
- d) withdraw your consent to the processing of personal data.


More specifically, the period of stored of personal data resulting from our policy of retention of personal data (entered in Records of processing activities). In any case, we do not systematically process any personally acquired personal data for any purpose defined by the Controller and / or established by the Act by the Controller. As far as possible, we shall inform the data subject whose accidentally obtained personal data are inadvertently obtained and, where appropriate, provide him with the necessary cooperation to restore control of his or her personal data. Immediately after these necessary steps to resolve the situation, we will immediately dispose of any personally acquired personal data in a safe manner without destruction.

6) ***Processors*** - our business partners, who may have access to your personal data, they also respect the privacy policy and we have a personal data processing agreement with them (list of processors is available on request at the email address ph@kodanplast.eu).


Recipients of data subjects' personal data are different groups of subjects to whom we provide your personal data most often as part of our legal obligations and/or are our own employees, with whom you are in contact as data subjects. Personal data will only be provided to public institutions such as administrative authorities, courts or law enforcement authorities to the extent permitted by law. Below is a list of categories of recipients of personal data:

- a) IT administrator services
- b) suppliers of software and technical support
- c) consulting and advisory companies
- d) postal operators and postal undertakings
- e) lawyers, bailiffs, notaries
- f) accountants – auditors
- g) using external recruitment agencies to select suitable employees and / or to participate in the selection of suitable job seekers

7) ***Controller data protection:*** we take technical and organizational security measures to protect your data from unauthorized access as widely as possible. Only authorized persons of the controller who are instructed in the processing and protection of such personal data have access to the relevant personal data.

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- 8) The processing of personal data is carried out **within the Member States of the European Union and the European Economic Area**. The processing of personal data in the territory of a third country may only be carried out with the consent of the controller and subject to the specific conditions laid down in the regulation of GDPR.
- 9) Personal data **will not be used for automated individual decision making**, including profiling.
- 10) The proper processing of your personal data is for Kodaň Plast s.r.o. important and their protection is a matter of course. You may exercise the following rights when processing personal data:
- Withdraw consent** – in cases where we process your personal data with your consent, you have the right to withdraw that consent at any time. You may withdraw the consent electronically, at the address of the Data protection officer, in writing, by notice of withdrawal of consent or in person at the office. Withdrawal of consent does not affect the lawfulness of the processing of personal data that we have under it about you processed.
 - Right of access by the data:** you have the right to confirm whether or not personal data are processed and, if so, you have access to processing information, categories of personal data concerned, recipients or categories of recipients, the period for which the personal data will be stored, as well as the right to information about your rights, the right to file a complaint with the Office for Personal Data Protection, information about the source of personal data, information on whether there is an automated decision and profiling, information and guarantees in case of transfer of personal data to a third country or international organization. You have the right to provide copies of the processed personal data as long as this act does not adversely affect the rights of other natural persons.
 - Right to rectification:** you have the right to obtain without undue delay the rectification of inaccurate personal data concerning you.
 - Right to erasure:** You may request that your personal data be erased without undue delay if the conditions set out in GDPR are met (you have a right of erasure in particular if your personal data are no longer needed for the purposes for which they were processed or if the personal data were processed unlawfully. The right of erasure shall not apply in particular where the processing of personal data is necessary to establish, exercise or defend the legal claims of the controller or third parties),
 - Right to restriction of processing:** in the cases set out in the GDPR (e.g. if you challenge the accuracy of your personal data or the processing is not in compliance with the law or we no longer need the personal data for the intended purpose, but you need it to establish, exercise or defend legal claims), you have the right to request that we restrict their processing
 - Right to data portability** – in certain circumstances, you have the right to ask us to transfer the personal data you have provided to another third party of your choice. However, the right to portability only applies to personal data that we have obtained from you by consent or under a contract to which you are a party.

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g) **Right to object:** if the processing of personal data carried out on a legal basis is a legitimate interest under the GDPR, you have the right to object to such processing. We may not further process this data unless the necessary legitimate reasons for processing outweigh your interests, rights and freedoms, or the grounds for establishing, exercising or defending our legal claims or third parties.

11) You have the right to file a complaint to the Office for Personal Data Protection of the Slovak Republic or to another competent supervisory authority, in particular where it is presumed that there has been a breach of the processing of personal data.

Contact to exercise of the rights of data subjects: in case you contact us by e-mail to address personally ph@kodanplast.eu or by post to the address Bytčická 2, 010 01 Žilina, we will store the data you have notified (your e-mail address or your name, surname and your phone number) to answer your questions to handle your request. Data will be erased if it is no longer needed for the purpose of processing, or we restrict its processing if there are legal obligations to keep it. We will provide you with comments and possible information on the action taken as soon as possible, but no later than within one month. If necessary and in view of the complexity and number of applications, we can extend this period to two months. We will inform you of the extension, including the reasons.