

## **Personal Data Protection**

The mission of Geis SK s.r.o. which is part of the multinational Geis group, is to provide and reliable forwarding services within and beyond the Slovak Republic. The company offers transport and logistical services that are constantly developed based on experience, new expertise and current logistic trends.

For the successful implementation of this mission it is necessary to ensure adequate protection of data and also all data processing equipment, thereby minimizing possible leaks in accordance with 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, as well as in compliance with new Slovak Act No.18/2018 Coll. on personal data protection and on the amendment and supplementation of some acts, as well as international standards and regulations. It is important for us that you are fully informed of the personal data that we obtain when providing our services and for you to be familiar with how we use them.

In connection with the processing of your personal data by Geis SK s.r.o. acts as independent operators, we have prepared following information for you, as a data subject (hereinafter a "Data Subject"), pursuant to Articles 13 and 14 of the GDPR.

## **Personal Data Processing**

## **Provision of Services**

We process the data of customers and suppliers, or rather their employees, to an extent for the purposes of concluding forwarding contracts or contracts on the transport of goods. We process personal data for the purpose of ensuring performance of such contracts and related activities. We also process the personal data of recipients of consignments for the purpose of delivering consignments. Your data are disclosed to us for these purposes through our customers from which you have ordered goods. For the purposes of the provision of the service of the delivery of goods (a consignment) Data Subjects are obligated to disclose data to the requested extent, as without such data we cannot realize the delivery of a consignment. The legal basis of processing personal data for the purposes of delivery of consignments by the recipient is Act No. 513/1991 Coll. (the Commercial Code), as amended.

## **Visiting Our Website**

We record and store your computer's IP address so that we can send the contents of our website to your computer (e.g. texts, images and files for downloading, etc.) in accordance with Article 6 (1) (b) of the GDPR. We process such data also so that we can identify and notify of any abuse. The legal basis in this case is Article 6 (1) (f) of the GDPR. In this context it is in our interest, as far as concerns the processing of personal data, to ensure the proper operation of our website and the business done over our website.

If we process your data, such as that specified above, for the purposes of ensuring the functionality of our website, you are contractually obligated to disclose this data to us.

## **Visiting Our Registered Office or Branch**

Geis SK s.r.o. conduct the video monitoring of their premises through a CCTV system for the purpose of increasing security and protecting assets with the aim of preventing criminality and other



antisocial activities that are property crime, committed primarily in the form of burglary, but also theft and damaging operator's assets. The subject of monitoring is the external space of the premises in general, the car parks, entrances to the premises and the operator's buildings, storage space, loading/unloading space and some internal common space.

In matters concerning a suspicion or the commission of misdemeanors and criminal offences, recordings from the CCTV system are provided to the Police or bodies active in criminal proceedings, administrative and misdemeanor proceedings and legal matters for the purposes of clarifying, investigating, authorizing or operative investigations into the matter affected by the recordings.

## Other Purposes

We also process personal data that are voluntarily provided to us (e.g. when placing an inquiry, ordering a meeting, online communication when performing our services, etc.). The legal basis in this case is Article 6(1) (b) of the GDPR. The data that we process in this context include the data of customers and suppliers, or rather their employees, to the extent necessary for the purposes specified as a part of this statement on personal data protection.

If we process your data as described above, e.g. for the purposes of the acceptance and processing of your inquiries, arranging a meeting or online communication during the provision of our services, etc., you are obligated to disclose these data. We cannot process your request without these data. If you agreed to the processing of personal data in accordance with Article 6(1) (a) of the GDPR, you can rescind your consent at any time. Rescinding your consent will not influence the lawfulness of processing based on your consent until the time the consent was rescinded.

## **Provision of Data to Third Parties**

In general we transfer your data to the relevant departments of Geis SK s.r.o. where they are processed to arrange the requested service and support.

Your personal data can also be processed by other legal entities. Such processing is, however, limited to the extent that is necessary for the purposes defined in this regulation on personal data protection or instructions issued by operator that another legal entity that acts as a service provider is obligated to comply with.

In this context, in reasoned cases we use service providers that process data on our behalf (primarily they are carriers that arrange the transport of consignments and "Geis Point" issue points). In these cases the information is transferred to third parties, to enable further processing. External service providers are carefully selected and checked at regular intervals in order to ensure reasonable protection of personal data. These service providers are bound by our instructions. With regard to this, they are subject to our requirements, which include the processing of your data solely in accordance with our instructions and in accordance with the valid Act on Personal Data Protection and they handle your data in such a manner as to maintain the confidentiality of information and are not entitled to process data for purposes other than those agreed.

The transfer of data to processors is realized based on Article 28(1) of the GDPR.

We will not hand your data over to third parties or provide them in another way for commercial purposes.

In addition to the above, we have the right to provide your personal data to bodies active in criminal proceedings and to any third parties suffering detriment without your express consent, if it is necessary to clarify the unlawful use of our services or to make legal claims. Such transfer is, however, only implemented if there is specific evidence of unlawful actions or abuse. The transfer of your data can also be realized if it contributes to the enforcement of the conditions of use or other agreements. We are also obligated to provide information on request to some public bodies. The transfer of such data is based on our legitimate interest in preventing abuse, enabling the prosecution of criminal offences and ensuring the exercise of rights, if our interests predominate



over your interests and rights to the protection of your personal data in accordance with Article 6(1) (f) of the GDPR.

## Intended Transfer of Data to Third Countries

In some cases, we can transfer your personal data to countries that are not part of the European Economic Area, if it is required for the performance of one of our contractual duties.

As a part of transferring data to recipients, we can also hand your data over to third countries outside the European Economic Area, including countries that do not enable a reasonable level of protection of your personal data. We can perform all such transfers only if the relevant recipient undertakes to comply with one of the standard contractual clauses issued by the European Commission and available at the addresses:

http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32010D0087, <a href="http://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32001D0497">http://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32001D0497</a> and <a href="http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32004D0915">http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32004D0915</a>.

## Security

Geis SK s.r.o. take suitable technical and organizational measures to protect all personal data from random or intentional manipulation, loss, destruction or access by unauthorized persons. This also applies to all external services purchased. We verify the effectiveness of our data protection measures and constantly improve them in accordance with technological developments. Personal data input are encrypted during transfer with the assistance of a secure encryption process.

### **Cookies**

In order to make our website pro-user and to adapt the operation of our website to your needs, our website can use cookies. A cookie is a small file that is stored locally on your computer when you visit a website. When you visit a website on a certain device, a cookie indicates, for example, that you are a repeat visitor. Cookies also help us to analyze the use of our website. They do not include any personal data and it is not possible to use them to identify you on third party websites - including analysis provider sites.

#### How Google processes personal information

We use the following types of cookies:

#### **Basic/Necessary Cookies**

These cookies are unavoidable for the operation of our website. They include, for example, the issue of anonymous ID sessions for the inclusion of multiple queries to the web server or arranging the error-free functioning of registrations and orders.

#### **Functional Cookies**

These cookies help us store your chosen settings or support other functions when you are at our website. They enable us to, for example, remember your preferred settings for your next visit or store your log-in data at our website.

#### **Performance/Statistics Cookies**

These cookies gather information about how you use our website (for example which internet browser you use, how frequently you visit our website, which pages you open or how long you remain at our website). These cookies do not store any information that enables the personal identification of visitors. The information gathered by these cookies is aggregated and therefore anonymous.



You can accept or reject the cookies - including those that are used for tracking websites - by selecting suitable settings for your browser. You can set up your browser to notify you if you get a new cookie or block them completely. If, however, you decide to reject cookies, you may not be able to use all the functions of our website (e.g. when ordering purchases). Your browser will also offer you the option of deleting cookies (for example with the help of the Delete search history function). You can find other information in the Help function for users in the Settings for your web browser.

## **Anonymized Monitoring of Websites**

With the aim of better harmonizing the website with our customers' needs, we analyze how our customers communicate with the website. We anonymize your IP address and use it for an analysis of data, such as pages at the address https://www.geis-group.com that were visited by your browser and your computer. We use cookies for this purpose. A cookie contains only one unique number with the help of which we can identify you at our website, but not at third party websites. We use the data recorded only for statistical purposes. In particular, your IP address will not be associated with any individual user. The data will not be shared with third parties.

## Google Universal Analytics - Terms and Conditions of Use

This web location uses the Google Universal Analytics service, a web analytical service provided by Google, Inc. ("Google"). The Google Universal Analytics service uses cookies, which are text files placed on your computer to help a website analyze how a user uses the site. The information created by a cookie about the use of a website (including your IP address) will be sent and stored by Google on servers in the United States.

IP anonymization is supported at this website. Google will abbreviate/anonymize the last octet of your IP address for European Union member states as well as for other parties to the Agreement on the European Economic Area. Only in exceptional cases is your full IP address sent and abbreviated by Google servers in the USA. On behalf of the website provider, Google uses this information for the purposes of assessing your use of websites, building overviews of websites' activities for website operators and providing additional services concerning website activities and internet use to a website provider. Google will not allocate your IP address to other data that Google has. You can refuse to use cookies by choosing the relevant settings in your browser. We point out, however, that if you do so you will not be able to make use of the website's full functionality. Besides this, you can prevent Google from gathering and using data (cookies and IP addresses) by downloading and installing a browser plugin available at https://tools.google.com/dlpage/gaoptout?hl=sk.

You can refuse to use Google Analytics services in your browser settings. On your computer you set a cookie rejection that prevents the future gathering of your data when visiting the website.

You can find further information concerning the conditions the use and the protection of personal data at http://www.google.com/analytics/terms/gb.html or at https://www.google.de/intl/en\_uk/policies/.

We draw attention to the fact that at this website the Google Analytics code is supplemented by "anonymizelp", to ensure the anonymization of the collection of IP addresses (IP-masking).

## **Plugins**

Our website uses connections to the following social networks:

- Facebook, Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA
- YouTube, LLC, 901 Cherry Ave., San Bruno CA 94066, USA
- LinkedIn, 2029 Stierlin Ct, Mountain View, CA 94043, USA

The buttons display the logos of the individual social networks. The buttons, however, are not standard plugins provided by social networks, but connections to button icons. The buttons are



activated only by an intentional activity (clicking). If you don't click on a button, no data will be transferred to social networks. By clicking on a button you accept communication with the social network's servers, by which you activate a button and create a link.

After clicking, a button works like a plugin for sharing. The social network obtains information about the website visited, which you can share with your friends and contacts. If you are not logged-in, you will be re-directed to the log-in page of the social network on which you clicked. If you are logged-in, your "like" or sharing of the relevant article will be sent.

If you activate a button, the social network will get the information that you obtained at the relevant page of our website and when you did so. In addition to this, information such as your IP address, details of the browser used and language settings can be sent. If you click on a button, your click will be transferred to the social network and used in accordance with the data rules.

If you click on a button, we do not have control over the data gathered and the processing activities. We are not responsible for this data processing; we are not the "controller" as defined in the GDPR. We are not aware of the full extent of the collection of data, its legal basis, purposes and storage period. With regard to this, the aforementioned information does not have to be necessarily complete.

The data is sent without regard to whether you have an account with the provider or whether you are logged in. If you are logged-in, your data will be allocated directly to your account. A provider can also use cookies on your computer for tracking.

As far as we know, such providers store such data in user profiles that they use for advertising, market research and/or a design oriented on queries. This type of analysis is performed (even for users that are not logged in), to present advertising oriented on queries and inform other social network users about your activities at our website. You have the right to object to the creation of such user profiles. If you want to exercise your right to object, please contact the relevant provider. Information about the purposes and extent of gathering data, further processing and use of data by the relevant social network and rights and personal data protection settings can be found in the information provided by the following social media websites:

Facebook: https://sk-sk.facebook.com/privacy/explanation

YouTube: https://policies.google.com/privacy?hl=en

LinkedIn: https://www.linkedin.com/legal/privacy-policy?trk=uno-reg-guest-home-privacy-policy If you don't want the social networks to obtain information about you, do not click on the aforementioned buttons.

## Standard Periods for Erasure of Data

Legislation has defined the periods and duties for storing data. At the end of these periods the relevant data will be regularly erased. Data to which the aforementioned periods and duties does not apply will be erased or anonymized immediately after the purposes defined in this statement on personal data protection cease to apply. If this statement on personal data protection does not contain other special provisions for storing data, we store all data that we gather, if they are required for the aforementioned purposes, for which they were gathered.

### **Further Use of Data and Their Erasure**

Any further processing or use of your personal data is commonly performed only to the extent permitted based on a legal regulation or if you agree to data processing or the use of data. In the event of further processing for other purposes such as those for which the data was originally gathered, we will inform you of their further use and provide you with all important information before further processing.

## **Identification and Prosecution of Abuse**



We will store all information for the identification and prosecution of abuse, in particular your IP address, for a maximum of 7 days. The legal basis in this case is Article 6(1)(f) of the GDPR. The reason for interest in storing your data for 7 days is to ensure the operation of our website and business realized through it and to prevent cybernetics attacks. If needed, we can use anonymous information to adapt the design of our website to the needs of the users.

## **Rights Related to Personal Data Processing**

#### **Right to Access**

On request, you have the right to obtain information from us about the personal data that concern you and that we have processed to the extent defined in Article 15 of the GDPR. You can send your request by post or e-mail to the addresses stated below.

#### **Right to Rectification**

You have the right to ask us to, without undue delay, to rectify any inaccuracies in personal data that concern you (Article 16 of the GDPR). For this purpose please contact the address specified below.

#### **Right to Erasure**

If you have valid legal reasons defined in Article 17 of the GDPR, you have the right to immediate erasure (the "right to be forgotten") of personal data that concerns you. These legal reasons include: the personal data are no longer needed for the purpose for which they were processed, or you rescind your consent and there are no other legal reasons for processing; a Data Subject objects to processing (and there are no overriding legitimate reasons for processing - this does not apply to objections to direct advertising). If you want to exercise your right, please get in touch with the contact address specified below.

#### Right to Restriction of Processing

If the criteria defined in Article 18 of the GDPR are met, you have the right to restrict processing, as stated in the previous article of the GDPR. In accordance with this article you can require a restriction on processing, in particular if processing is unlawful and the Data Subject opposes the erasure of personal data and requests, instead of this, a restriction on their use, or if the Data Subject objects to processing in accordance with Article 21(1) of the GDPR, if it is not clear whether our legitimate interest overrides the Data Subject's interest. If you want to exercise your right, please get in touch with the contact address specified below.

#### **Right to Data Portability**

You have the right to data portability, as defined in Article 20 of the GDPR. This means that you have the right to obtain the personal data that concern you that you provided to us in a structured, ordinarily-used and machine-readable format and you have the right to transfer such data to another processor. The condition is that processing is based on a consent or contract and is performed using automatic means. If you want to exercise your right, please get in touch with the contact address specified below.

## **Right to Object**

In accordance with Article 21 of the GDPR you have the right to, at any time, object to the processing of personal data that concerns you that is based on Article 6(1)(e) or (f) of the GDPR, for reasons concerning your specific situation. We will stop processing your personal data if we cannot prove convincing, legitimate reasons for processing that override your interests, rights and freedoms, or if the purpose of processing is not proving, exercising and defending legal claims. If you want to exercise your right, please get in touch with the contact address specified below.



Right to Make a Complaint to the Supervisory Body

If you think that the processing of the personal data that concerns you and that we have performed is unlawful or impermissible, you have the right to submit a complaint to the relevant supervisory body. You can contact this body at the following address:

## Úrad na ochranu osobných údajov Slovenskej republiky (Office for Personal Data Protection of the Slovak Republic)

Hraničná 12 820 07, Bratislava 27 Slovak Republic

Registered number: 36064220 www.dataprotection.gov.sk

Telephone consultations concerning personal data protection: Tuesday and Thursday from 08:00 to 12:00 +421/2/3231 3220.

# Contact details of the operator and responsible person Geis SK s.r.o.

Trňanská 6, 960 01 Zvolen Registered number: 31 324 428 VAT ID number: SK 2020452687

The company is entered in the Commercial Register maintained by the District Court in Banská

Bystrica, section: Sro, entry number: 2083/S

Responsible person for the operator Geis SK s.r.o.:

Please address matters concerning the processing of your personal data, requests for information and claiming of rights of Data Subjects or complaints directly to our responsible person, who is available to you at the e-mail address gdpr@qeis.sk.

1 June 2021