

PRIVACY NOTICE

BUSINESS PARTNERS, THEIR EMPLOYEES, CONTACT PERSONS, REPRESENTATIVES, AND SUBCONTRACTORS

In the course of carrying out our activities, we obtain personal data of business partners, potential business partners, their employees, contact persons, authorised representatives, subcontractors and, where applicable, other natural persons connected with a legal entity ("**business partners**"). We want our business partners to know what kind of data we use, what we do with it, who we provide it to and to have them understand their rights, via which they can inspect the processing of their personal data.

This document contains information on conditions of processing personal data of business partners in line 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, and repealing Directive 95/46/EC (General Data Protection Regulation, "**GDPR**") and the Act No. 18/2018 Z.z. on protection of personal data and on amendment of certain acts ("**Act**").

The information set out in this document applies where we process personal data as a controller and relates to business partners who are natural persons. This information does not apply to the processing of data of legal entities. Further information on personal data protection may also be provided by means of a separate notice or statement.

1 RESPONSIBILITY FOR PERSONAL DATA PROCESSING

ZSE Energetické služby, s. r. o., registered office: Čulenova 6, 811 09 Bratislava, CRN: 52 820 2023, registered in the Companies Register of the City Court Bratislava III, Section: Sro, File No. 142010/B ("**ZSE Energetické služby**" or **we**" in the applicable grammatical form), email: elektromobilita@zse.sk, processes business partners' personal data to the extent and under the conditions set out in this document and, as a controller, is responsible for their protection and processing. Unless otherwise stated in legal regulations, ZSE Energetické služby is also responsible for the processing of personal data by processors appointed for this purpose.

2 CONDITIONS OF PERSONAL DATA PROCESSING

2.1 PERSONAL DATA CATEGORIES

Depending on the specific purpose of processing and the legal basis, we process the following categories of personal data (specific scope of personal data used for given purpose is indicated in Clause 2.2):

- a) Identification data (first name, surname, title, date of birth, company identification number, citizenship, details of registration in a register or other records), including data contained in the signatory's qualified certificate,
- b) Official document data (type, number),
- c) Contact data (residence / registered office, mailing address, phone number, email address);
- d) Bank details;
- e) Data on invoiced and collected amounts;
- f) Information relating to the relationship with the business partner (information on the contract, services or performances provided, outstanding receivables, damage incurred);
- g) Personal identification number;
- h) Information on clean record, including the criminal record certificate;
- i) Data contained in statutory declarations, references, certificates and other submitted documents;
- j) Other data provided by the business partner in connection with the relationship with the controller or communication with the business partner;
- k) Other data necessary to comply with legal requirements, and defend, exercise and prove legal claims, as well as to protect legitimate interests;
- l) likeness captured in a photograph.

2.2 LEGAL BASIS AND PURPOSE OF USING PERSONAL DATA

Personal data of our business partners is used only if it is necessary for the performance of the contract and within pre-contractual relations if mandated by applicable laws, or if it is necessary to protect our legitimate interests.

Provision and processing of personal data for purposes of contract performance and pre-contractual relations is contractually required. If personal data are not available in the necessary scope (especially to verify the identity and acquire data necessary for the contract performance), we are unable to conclude the contract.

We want to protect certain interests which are important for our usual business (e.g. collecting debts, compensation for damage, defending other legal claims), and we use personal data of business partners for this purpose. We are always mindful of not making our justified interests inadequate.

If, despite this, the business partners are concerned that data processing prevails over their basic rights and liberties, they may object to it.

Personal data are processed and disclosed to other subjects if there is a legal requirement stipulated by law.

Acquired personal data can subsequently be processed for statistical purposes in a manner compatible with the original purpose, whereas ZSE Energetické služby shall ensure that personal data are only used to the necessary extent, or that only information which is not deemed personal data is processed.

2.2.1 Contract performance and pre-contract relations

ZSE Energetické služby processes personal data in the context of pre-contractual relationships for the negotiation of contractual terms and the preparation of contractual documentation, for the conclusion, amendment, and termination of contracts in accordance with legal regulations, for the provision of services depending on the subject of the contract, including the use of electronic applications (e.g., supplier portal), for invoicing, handling requests, and communicating with the business partner on other matters. These primarily concern contracts for the supply of various goods or services, contracts relating to real estate, and similar agreements.

The extent of the processed data is based on the respective contractual and other documents, requests, forms and other documents. Generally, we use personal data under Clause 2.1 (a) to (d), (f) and (j). The duration of the processing is limited by the term of the respective contractual relation or existence of rights resulting from the given contract. Personal data may also be processed if there is another legal basis (e.g., a legitimate interest in asserting or demonstrating legal claims). If personal data of the signatory are processed in connection with the use of a qualified electronic signature, ZSE Energetické služby requires that the qualified certificate include at least the first name and surname of the signatory as an attribute. Providing the signatory's personal identification number is not necessary to achieve the purpose of the processing.

2.2.2 Legal obligation

As part of compliance with the obligations stipulated by law, we process personal data (including their disclosure to other subjects) especially for the following purposes:

- resolving legal disputes (Act No. 160/2015 Z.z. Code of Civil Contentious Procedure, Act No. 162/2015 Z.z. Code of Administrative Court Proceedings, and related laws);
- resolution of disputes in arbitration proceedings (Act No. 244/2002 Z.z. on Arbitration Proceedings),
- disclosure of information for purposes of criminal proceedings (Act No. 301/2005 Z.z. Criminal Procedure Code, Act No. 171/1993 Z.z. on Police Force, and related laws);

- disclosure of information required for the evaluation of the state of facts (Act No. 160/2015 Z.z. Code of Contentious Civil Procedure and related laws);
- resolving distraintment (Act No. 59/2018 Z.z. Code of Distraintment Procedure),
- bankruptcies and restructuring (Act No. 7/2005 Z.z. on Bankruptcies and Restructuring),
- registry administration – recording, creation, storage, protection of registry records, access to them and ensuring of their elimination (Act No. 395/2002 Z.z. on Archives and Registries),
- resolving administrative proceedings (Act No. 71/1967 Zb. Administrative Procedure Code and related laws),
- offence proceedings (Act No. 372/1990 Zb. on Offences and related laws),
- handling data subject requests to exercise rights under GDPR and the Act,
- notification of infringement of personal data protection under GDPR and the Act,
- processing of accounting documents (Act No. 431/2002 Z.z. on Accounting, Act No. 222/2004 Z.z. on Value-Added Tax),
- tax administration (Act No. 563/2009 Z.z. Tax Procedure Code, Act No. 595/2003 Z.z. on Income Tax),
- review of financial statements by an auditor (Act No. 431/2022 Z. z. on Accounting, Act No. 423/2015 Z.z. on Statutory Audit and related laws),
- handling reports related to the reporting of criminal or other anti-social activities (Act No. 307/2014 Z.z. on Certain Measures Related to the Reporting of Anti-Social Activities),
- Public procurement (Act No. 343/2015 Z.z. on Public Procurement),
- Audit of projects financed by EU funds (Regulation No. 966/2012 of the European Parliament and of the Council on the financial rules applicable to the general budget of the Union),
- prevention of money laundering and terrorist financing (within the meaning of Act No. 297/2008 Z.z. on Protection Against Money Laundering and Terrorist Financing),
- for the purpose of fulfilling obligations under Act No. 289/2016 Z.z. on the Implementation of International Sanctions and Amendment of Act No. 566/2001 Z.z. on Securities and Investment Services, as amended, including monitoring the published list of sanctioned persons and identifying their assets with the controller,
- compliance with relevant legal or regulatory requirements in special cases under other applicable laws.

For this purpose we use personal data categories under Clause 2.1 a) – k), whereas the exact scope of personal data processed depends on the applicable laws and specific situation. The retention period of personal data is based on the relevant legal regulations. If, in the specific case, there is no justified need to retain the data over a longer period, they are stored for no longer than 10 years from the termination of the contractual relationship.

Personal data are disclosed to public authorities and other authorised entities under applicable laws. These primarily include courts, arbitration tribunals, statutory auditors and auditing firms, lawyers, distraintors, notaries, bankruptcy trustees, law enforcement authorities, the tax administrator, district offices, the Public Procurement Office of the Slovak Republic, the Office for Personal Data Protection of the Slovak Republic, the Ministry of the Interior of the Slovak Republic, and the Ministry of Justice of the Slovak Republic..

2.2.3 Legitimate interest

ZSE Energetické služby processes personal data for purposes of legitimate interests, which are:

- Protection of the provider's property and property rights,
- Proving and control of compliance with statutory obligations.

ZSE Energetické služby processes personal data on the basis of legitimate interest primarily for the following purposes:

- Business communication with the business partner through its employees, contact persons, and authorised representatives. Scope of processed personal data categories: title, first name, surname, job position, role, functional position, personal employee number or staff number, department, place of work, telephone number, fax number, work email address.

- Recording data subject's requests for execution of their rights. Personal data categories as per Clause 2.1 (a), (c) and (k) are processed for 5 years from when the request was handled.
- Exercising, defending and proving legal claims (e.g. to recovery of receivables, compensation for damage, surrender of unjust enrichment). Scope of processed personal data categories as per Clause 2.1 a) – f), i) – k). Period of storing depends on legal periods of limitation. If there is no justified expectation of longer retention in a particular case, the data are destroyed after 10 years.
- Records of incoming and outgoing mail. Scope of processed personal data categories as per Clause 2.1 a), c). Retention period is 5 years from when the mail was received or sent.
- Administration and records of contracts and other agreements. Scope of processed personal data categories as per Clause 2.1 a) – d) depending on the document. The data are retained for no longer than 10 years from the contract termination.
- Handling reports concerning suspected violations of the Code of Conduct. Scope of processed personal data categories as per Clause 2.1 a), c), k). Retention period: 3 years from the time when the complaint was resolved.
- Record of processors processing personal data on behalf of the controller (applies only if the business partner acts as a processor). Scope of personal data categories to be processed as per Clause 2.1 a), c). Retention period: 5 years after the end of the contractual relationship.
- Ensuring information and network security (applies only to business partners having access to the controller's system). Categories of personal data processed: identification data and other common personal data, access data for information systems, logs. Retention period: 1 year.
- Using application for services of information technologies and information systems (applies only to business partners having access to the controller's system and technologies). Categories of personal data to be processed: Name, surname, personal number, role, access data to information systems. Retention period: Throughout the validity of the access authorisation.
- Record of parking and access permits (applies only to business partners with a permit). Scope of personal data processed: first name, surname, job or equivalent position, contact information (email address/telephone number), address, date of birth, identity document number, licence plate number. Retention period: Throughout the validity of the permit.
- Organising events with participation of business partners. Scope of personal data processed: first name, surname, information about the employer/organisation, and other information necessary for organising the event. Retention period: until the end of the event.
- Internal analysis of compliance and risk assessment. Scope of processed personal data categories as per Clause 2.1 a), c), k). Retention period: 5 years.
- Screening the employees and business partners for purposes of assessing the risk and avoiding the harm of interests of the controller. Scope of processed personal data categories as per Clause 2.1 a), b), h), i), k). Retention period: for the duration of the contractual relationship.
- Provision of information in connection with the implementation of business transactions (e.g. as part of due diligence). Scope of processed personal data as per Clause 2.1 a), c), k). Retention period: during the transaction.

- Statistical purposes. Personalised data and data regarding the contractual relationship with ZSE Energetické služby are processed only in justified cases and in the necessary extent; and statistical outputs do not contain personal data. Data are processed during the preparation of statistical data.

2.3 SOURCE OF PERSONAL DATA

ZSE Energetické služby obtains personal data from business partners, from public authorities and other entities listed in Clause 2.2.2, as well as from publicly accessible sources and databases.

2.4 AUTOMATED DECISION-MAKING

ZSE Energetické služby does not make automated individual decisions including profiling without human intervention which would have any legal effects or other significant impact on the business partners.

2.5 PERSONAL DATA TRANSFER

Transfer of personal data to third countries (outside EU/EEA) will only take place if according to the decision of the Commission (EU) the third country provides adequate protection or the controller and/or processor who imported the data offered adequate guarantees of personal data protection (e.g. through standard clauses on data protection).

3 DATA RECIPIENTS

Personal data of our business partners are provided primarily to processors who were authorised by us to process them on our behalf. These are particularly ZSE Group companies (www.skupinazse.sk), printing companies, consulting companies, IT service providers, debt collection companies, service providers and other persons whose services we use during the provision of our services. We carefully choose our processors to be able to ensure that the legal requirements for data protection are met. ZSE Energetické služby also provides personal data to postal service providers, courier companies, as well as to other entities to the extent of obligations laid down by law (see Clause 2.2.2).

4 DATA SUBJECT'S RIGHTS AND THEIR EXERCISE

4.1 Práva obchodného partnera

Business partner as the data subject has the following rights:

- to recall the consent to process personal data at any time (if the processing is based on their consent),
- obtain from ZSE Energetické služby a confirmation whether personal data relating to him or her are processed and if so, he or she is entitled to access to such personal data, information on personal data processing and a copy of data (ZSE Energetické služby shall be entitled to charge an adequate fee for administrative costs related to issuing additional copies requested by the business partner);
- for ZSE Energetické služby to rectify incorrect personal data relating to the data subject without undue delay,
- right to erasure, i.e. right to make ZSE Energetické služby without undue delay erase personal data relating to him or her, and the controller is obliged to erase personal data without undue delay, provided that conditions indicated in Article 17 of GDPR are met,
- right to restriction of personal data processing in cases specified in Article 18 of GDPR;
- right for portability of data, meaning the right to get personal data related to him/her, which he/she provided to ZSE Energetické služby, in a structured, generally used format that can be displayed on computers, and the right to transmit this data to another controller, if conditions under Article 20 of GDPR are met,
- to object against the processing of personal data related to him/her any time due to reasons related to his/her specific situation, if such processing is being conducted based on a legitimate interest, including objecting against profiling;

- right not to be subject to decisions based exclusively on automated processing, including profiling, which has the legal effects concerning him or her or significantly impacts him or her,
- seek protection of his/her rights at the relevant court under Article 78 of GDPR;
- file a complaint with the supervisory body, especially in the member state of their habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes GDPR. For the Slovak Republic, the supervisory authority is the Office for Personal Data Protection of the Slovak Republic, Budova Park One, Námestie 1. mája 18, 811 06 Bratislava, Slovak Republic, telephone: +421 2 3231 3214, email: statny.dozor@pdp.gov.sk.

4.2 How to exercise your rights

In order to protect the rights of business partners and prevent potential misuse or leak of personal data, rights of data subjects can exclusively be exercised in the following manner:

- By postal mail sent to the registered office of ZSE Energetické služby
- Via email to elektromobilita@zse.sk.

For the request to exercise the rights to be accepted it is necessary to sufficiently identify the applicant and to clearly specify the subject of the request. Otherwise the request will be rejected.

With regard to the right to access to data, the right for transferability of data and right to erasure of data whose misuse could seriously affect the data subject's rights and liberties, we recommend for the applicant's signature on the request sent by post or delivered to the post room to be officially certified; if the request is sent via email, it must be signed using the applicant's qualified electronic signature. When a request is submitted in person, these conditions do not have to be met, as we verify the identity on the basis of the presented identity document.

If the data subject's right is exercised by another person based on the power of attorney, we require the original of the power of attorney with officially certified principal's signature; the power of attorney may not be older than 6 months.

5 CONTACT FOR PERSONAL DATA PROTECTION ENQUIRIES

Should you have any questions or comments related to personal data protection, please contact our Data Protection Officer via email at: elektromobilita@zse.sk or by letter to ZSE Energetické služby, s.r.o., Čulenova 6, 811 09 Bratislava.

6 FINAL PROVISIONS

This document comes into effect on 1 January 2026.

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