

## PRIVACY NOTICE FOR THE ELECTRONIC TRIP LOG SERVICE

In connection with the provision of the **electronic trip log** service, we obtain customers' personal data, which are processed in the manner described in this document.

We want to give our customers an overview of what data we use, what we do with them, who we disclose them to, and we also want our customers to understand their rights, which they can exercise to have control over their personal data.

This document contains information on the terms and conditions of processing personal data of the electronic trip log service customers in line with the 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 Personal Data Protection and on amendment of certain acts ("Act").

### 1 TERMS AND DEFINITIONS

We believe that more information leads to better understanding of the rules of processing personal data. In the following part, we therefore explain the most important terms used in relation to personal data protection.

**Personal data** – means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Data subject** – is identified or identifiable natural person who is the subject of personal data. All customers who are natural persons (including self-employed persons) or other natural persons whose personal data are processed in connection with the provision of the electronic trip log service are considered to be data subjects.

**Controller** – is the subject who determines the conditions of personal data processing and is responsible for personal data processing.

**Processor** – means the subject who processes personal data on behalf of the controller. The controller may authorise the processor to process personal data without the data subject's consent, however, the controller must verify that the processor provides sufficient guarantees to ensure compliance of personal data processing with the GDPR.

**Joint controllers** – if two or more controllers jointly determine the purposes and means of processing, they are joint controllers; for the purposes of this document, the joint controllers are ZSE Energetické služby, s.r.o., and the relevant Partner.

**Processing** - means any operation which is performed on personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval,

consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Profiling** - means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

## 2 RESPONSIBILITY FOR THE PERSONAL DATA PROCESSING AND INFORMATION ON JOINT CONTROLLERS

ZSE Energetické služby, s. r. o., registered office: Čulenova 6, 811 09 Bratislava, Slovak Republic, registered in the Companies Register of the City Court Bratislava III, Section: Sro, File No. 142010/B, Company Registration No. 52 820 203, email: [elektromobilita@zse.sk](mailto:elektromobilita@zse.sk) ("ZSE Energetické služby) processes customers' personal data to the extent and under the conditions set out in this document and, as a controller or joint controller, is responsible for their protection and processing.

### Essentials of the joint controllers' agreement:

ZSE Energetické služby and each of the Partners listed in this register have entered into a joint controllers' agreement pursuant to Article 26 of the GDPR on the joint processing of personal data for the purpose of creating an electronic trip log.

In this agreement, the joint controllers have defined the following essential parts as follows:

- The joint contact point for data subjects, where rights under Articles 13 to 25 of the GDPR can be exercised, is ZSE Energetické služby, s.r.o., Čulenova 6, 811 09 Bratislava, email: [elektromobilita@zse.sk](mailto:elektromobilita@zse.sk).
- Standard information pursuant to Articles 13 and 14 of the GDPR, in the form of standard data protection terms ("PRIVACY NOTICE FOR THE ELECTRONIC TRIP LOG SERVICE"), is available on <https://zsedrive.sk/materialy-na-stiahnutie>.

## 3 CONDITIONS OF PERSONAL DATA PROCESSING

### 3.1 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 3.2):

- a) identification data (name, surname),
- b) contact data (phone number, email),
- c) transaction and accounting data concerning the charging,
- d) licence plate number,
- e) employee identifier.

### 3.2 LEGAL BASIS AND PURPOSE OF USING PERSONAL DATA

Customer personal data is used only if it is necessary for the performance of the contract and within pre-contractual relations, or if it is necessary to protect our legitimate interests. In certain cases, the use of already collected personal data may be required by law.

Provision and processing of personal data for purposes of contract performance and pre-contractual relations is contractually required. If we do not have personal data available to the required extent, we cannot proceed with concluding the contract.

**Joint controllers process personal data for the following purpose:**

**a) creation of an electronic trip log**

For this purpose, the joint controllers collect customers' personal data to the extent specified in Clause 3.1(a), (b), (c), (d), and (e). The legal basis for processing is the necessity of processing for the performance of a contract pursuant to Article 6(1)(b) of the GDPR, and, in the case of customer employees' data, the legitimate interest of the joint controllers pursuant to Article 6(1)(f) of the GDPR. The period of active processing of personal data is defined by the provision of the electronic trip log service.

Additional purposes for which personal data may be processed by the joint controllers:

**b) Recording data subject's requests for execution of their rights.**

Personal data categories under Clause 3.1 a), b) and e), together with additional data relating to the right exercised and the manner in which the request was handled, are processed for 5 years from the handling of the request. The legal basis is the legitimate interest of the joint controllers pursuant to Article 6(1)(f) of the GDPR.

**c) Exercising, defending and proving legal claims.**

Scope of processed personal data categories as per Clause 3.1 a), b), c), d) and e). Period of storing depends on legal periods of limitation. The legal basis is the legitimate interest of the joint controllers pursuant to Article 6(1)(f) of the GDPR. Unless longer storage can be justifiably assumed in the specific case, data are stored for 10 years from the termination of the contractual relationship.

**You have the right to object to the processing of data for purposes of justified interests.** In that case we may still process your personal data only if we prove necessary justified reasons for processing which prevail over your interests, rights and liberties.

### 3.3 SOURCE OF PERSONAL DATA

The joint controllers obtain personal data primarily directly from the customer, including by recording the customer's activity when using the electric vehicle.

### 3.4 AUTOMATED DECISIONS, PROFILING

The joint controllers do not perform automated individual decision-making without human intervention that would have legal effects on the data subjects or similarly significant impact.

### 3.5 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).

## 4 DATA RECIPIENTS

Personal data may be provided also to processors who were authorised by us to process them on our behalf. These are, in particular, companies of the ZSE Group ([www.skupinazse.sk](http://www.skupinazse.sk)), IT service providers, debt collection agencies and other persons whose services we use in carrying out our activities. We carefully choose our processors to be able to ensure that the legal requirements for data protection are met.

## 5 DATA SUBJECT'S RIGHTS AND THEIR EXERCISE

### 5.1 Data subject's rights

The data subject is entitled to:

- obtain from the joint controllers 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 (in exceptional cases, an adequate fee may be charged for administrative costs related to issuing additional copies requested by the data subject),
- ask the joint controllers to rectify incorrect personal data relating to the data subject without undue delay,
- right to erasure, i.e. right to make the joint controllers erase personal data relating to him or her without undue delay, and the joint controllers are 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 the joint controllers, 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 applying to him/her, relates to him/her or significantly impacts him/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, telephone: +421 2 3231 3214, email: statny.dozor@pdp.gov.sk.

## 5.2 How to exercise your rights

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

- By postal mail sent to the address ZSE Energetické služby, s.r.o., Čulenova 6, 811 09 Bratislava
- Via email to: [elektromobilita@zse.sk](mailto: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 mailing room to be officially certified; if the request is sent via email, it must be signed using the applicant's qualified electronic signature. If these conditions are not met, we will, in cooperation with the data subject, seek other ways to verify the identity of the applicant.

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.

## 6 CONTACT FOR PERSONAL DATA PROTECTION ENQUIRIES

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

## 7 FINAL PROVISIONS

This document comes into effect on 1 January 2026.

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