

NOTICE ON THE PROCESSING OF PERSONAL DATA for business/contractual partners

within the meaning of Article 13 et seq. 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 ("GDPR") and with regard to Act No. 18/2018 Coll. on the protection of personal data and on amendments and supplements to certain acts, as amended ("ZOOU").

This information on the processing of personal data is intended for data subjects - business/contractual partners of Panasonic Industrial Devices Slovakia s.r.o. ("PIDEU-SK") (e.g. suppliers, customers, etc.), which may be: natural persons, natural persons entrepreneurs, representatives of natural persons, representatives of natural persons entrepreneurs and representatives of legal entities.

Identification and contact details of the controller:

Panasonic Industrial Devices Slovakia s.r.o.

Headquarters: Oravicka 616, 02801 Trstena

Production plant: Tovarenska 13, 06401 Stara Lubovna

Representative of the controller: Ing. Jozef Hricov, proxy holder

VAT: 36372285, registered in the Commercial Register of the District Court in Zilina, Section Sro, Insert No. 10396/L

Data protection officer (DPO) of the controller: Ing. Marian Tabacik, personnel Department (at the address of the controller's headquarters), email: gdpr@eu.panasonic.com, tel.: +421(0)435303219.

If you have any questions about the processing of your personal data or if you wish to claim the rights of data subjects, please contact the data protection officer of the controller.

THE PURPOSES AND CONDITIONS OF THE PROCESSING OF PERSONAL DATA

1. The purpose of the processing of personal data is **business communication in the preparation and implementation of the business activities of the controller** (this purpose applies to cases where the business partner/contractor is a legal entity)
 - Legal basis: Article 6(1)(f) of the Regulation - Legitimate interest of the controller in processing the personal data of a person authorized to act on behalf of a potential or contractual partner (e.g. supplier, customer), personal data of a potential or contractual partner's employee used in business communications or provided to the controller on the basis of concluded contracts (in particular supply, customer contracts) or on the basis of drafts of such contracts, in order to ensure business communications aimed at the conclusion and proper performance of a contract; personal data is directly stated in orders, contracts or obtained in connection with the performance of contracts/order, etc.
 - Data subjects: employees and members of the statutory body of the controller's business partners and other natural persons whose personal data are contained in commercial communications
 - Personal data: identification and contact details (in particular name, surname, title, function/job title, telephone number, email, details of your employer, signature)
 - Archiving period: 10 years following the year in which the contract/business communication was terminated
2. The purpose of the processing of personal data is the **conclusion and performance of a contractual relationship with the data subject in the provision of goods, works, services, etc.** (this purpose applies to cases where the business partner/contractor is a natural person)
 - Legal basis: Article 6(1)(b) of the Regulation necessary for the performance of the CONTRACT and the CONTRACTUAL RELATIONS
 - Data subjects: contracting parties - natural persons, natural persons-entrepreneurs
 - Personal data: the personal data indicated on the contract to which the data subject is a party, in particular identification data (in particular name, surname, title, date of birth, permanent address, mailing address, in some cases also birth number, name, ID number, VAT number, bank connection (IBAN), place of business of the entrepreneur and contact details (phone number, e-mail)
 - Archiving period: 10 years following the year in which the contract/business communication was terminated
3. The purpose of the processing of personal data is to **maintain accounting and bookkeeping records** (this purpose applies where we process accounting/tax documents and payments containing your personal data)

- Legal basis: Article 6(1)(c) of the Regulation - necessary for the fulfilment of the LEGAL OBLIGATIONS of the controller arising in particular from Act No. 431/2002 Coll. on Accounting, as amended, Act No. 222/2004 Coll. on Value Added Tax, as amended, and other accounting regulations
 - Data subjects: natural persons included in the accounting documents
 - Personal data: personal data contained in accounting documents
 - Archiving period: 10 years following the year to which they relate
4. The purpose of the processing of personal data is the **management of the register and the registration of mail** (this purpose applies to cases where your personal data is contained in incoming or outgoing correspondence and registers)
- Legal basis: Article 6(1)(c) of the Regulation - necessary to fulfil the LEGAL OBLIGATIONS of the controller arising from Act No. 395/2002 Coll. on archives and registers and on the amendment of certain acts, as amended, and related legislation
 - Data subjects: senders and recipients of correspondence and other persons mentioned in the correspondence
 - Personal data: personal data contained in incoming and outgoing mail and registers
 - Archiving period: in the case of routine correspondence, 10 years following the year in which the communication record was created
5. The purpose of the processing of personal data is to **provide work safety and anti-fire safety training** (this purpose applies where you are required to undergo training as a result of the activity you carry out for us)
- Legal basis: Article 6(1)(c) of the Regulation - necessary to fulfil the LEGAL OBLIGATIONS of the controller arising in particular from Act No. 124/2006 Coll. on Health and Safety at Work and on Amendments and Additions to Certain Acts, Act No. 314/2001 Coll. on Fire Protection, as amended, and Act No. 355/2007 Coll. on the Protection, Promotion and Development of Public Health and on Amendments and Additions to Certain Acts, as amended.
 - Data subjects: persons participating in work safety and anti-fire safety training
 - Personal data: personal data contained on the records
 - Archiving period: 5 years following the year relating to training
6. The purpose of the processing of personal data is to **deal with accidents at work and other accidents** (this purpose applies to cases where an accident at work or other accident occurs)
- Legal basis: Article 6(1)(c) of the Regulation - necessary to fulfil the LEGAL OBLIGATIONS of the controller arising in particular from Act No. 124/2006 Coll. on Health and Safety at Work and on Amendments and Additions to Certain Acts, Act No. 314/2001 Coll. on Fire Protection, as amended, and Act No. 355/2007 Coll. on the Protection, Promotion and Development of Public Health and on Amendments and Additions to Certain Acts, as amended.
 - Data subjects: persons involved in the work/other accident
 - Personal data: accident-related personal data
 - Archiving period: ordinary accidents - 5 years following the year to which they relate; fatal and serious accidents and occupational diseases - permanent archiving period
7. The purpose of the processing of personal data is the **registration and handling of notifications of antisocial activity** within the meaning of Act No. 54/2019 Coll. on the Protection of Whistleblowers of Antisocial Activity and on Amendments and Additions to Certain Acts, as amended (this purpose applies to cases where your personal data will be processed in connection with a notification pursuant to Act No. 54/2019 Coll. on the Protection of Whistleblowers of Antisocial Activity and on Amendments and Additions to Certain Acts, as amended).
- Legal basis: article 6(1)(c) GDPR - necessary to fulfil the LEGAL OBLIGATIONS of the controller arising from Act No. 54/2019 Coll. on the Protection of Whistleblowers of Anti-Social Activity and on Amendments and Additions to Certain Acts, as amended
 - Data subjects: whistleblowers of antisocial activity within the meaning of Act No. 54/2019 Coll. on the protection of whistleblowers of antisocial activity and on the amendment and supplementation of certain acts, as amended, and persons mentioned in the notifications
 - Personal data: personal data concerning notifications of anti-social activities
 - Archiving period: 3 years from the date of receipt of the notification

8. The purpose of the processing of the personal Data is the **network security agenda** (this purpose applies when you access our IT environment or our IT systems)
- Legal basis: Article 6(1)(f) of the Regulation - Legitimate interest of the controller, consisting in particular in the following:
 - protection of data and ensuring the continuous flow of this data, which is necessary to ensure uninterrupted production process (business activity);
 - ensuring information security and cyber security - implementing preventive and control measures to prevent unauthorized access to electronic communication networks, preventing the spread of malicious program codes, as well as stopping attacks aimed at overloading servers and damaging computer and electronic communication systems, etc.;
 - comply with legal requirements relating to the protection of personal data (GDPR) and cybersecurity (NIS2) -> take appropriate security measures to prevent unlawful processing of personal data and other information that needs to be protected in the controller's environment.
 - meeting the requirements of international standards (norms) of information security (ISO27001, TISAX).
 - Data subjects: natural persons who have access to the controller's systems or persons whose personal data are contained in the controller's systems
 - Personal data: login data to IT systems, data related to the use of network services, IP addresses, log records, etc.
 - Archiving period: 12 months from the creation of the logs
9. The purpose of the processing of the personal data is the **registration of entries to the premises and facilities of PIDEU-SK** (granting permission to enter the premises and to the controller's facilities).
- Legal basis: Article 6(1)(f) of the Regulation - Legitimate interest of the controller consisting in the right to the protection of property and the right to control the access of data subjects to the controller's premises, both in general and as an organizational security measure
 - Data subjects: persons entering the premises and facilities of the controller on the basis of a special permit
 - Personal data: name and surname, employer's name, name and surname of the person visited, purpose of the visit, license plate number of the vehicle, time of arrival and departure, signature
 - Archiving period: 6 months from the creation of the record
10. The purpose of the processing of personal data is to **monitor the premises and facilities of the controller by a security camera system** (in case you enter the premises or enter the premises of the controller)
- Legal basis: Article 6(1)(a) of the EC Treaty. (f) of the Regulation - Legitimate interest of the controller, consisting in particular in the following: protection of the property of the controller and the property of its employees (with the aim of preventing and detecting crime, mainly committed in the form of burglary, as well as theft and damage to property of others); protection of the property of business partners (customers, suppliers) and their employees; resolution (examination) of customer complaints; protection against unauthorized entry of unauthorized persons into the premises and premises of the company; protection of life and health of the persons concerned; protection of sensitive information of the controller (including personal data); protection against fires and protection of the environment (early detection of fires).
 - Data subjects: natural persons who enter the monitored (marked) area
 - Personal data: video footage of the person concerned, photograph, vehicle registration number, expressions of a personal nature captured on CCTV. The CCTV footage is exclusively a visual recording, not an audio recording.
 - Archiving period: 72 hours, or 14 days in certain justified cases (for the purpose of resolving customer complaints and proving that the goods dispatched have left our warehouse without damage).
11. The purpose of the processing of the personal Data is to **claim the rights of data subjects under the GDPR** (this purpose applies in cases where your rights under the GDPR and the DPA are exercised)
- Legal basis: Article 6(1)(c) of the Regulation - necessary for compliance with the LEGAL OBLIGATIONS of the controller under the Regulation and the GDPR and related legislation
 - Data subjects: natural persons claiming the rights of data subjects, or their representatives
 - Personal data: identification data - e.g. name, surname, title, date of birth and address of permanent residence and other PERSONAL DATA contained in requests for the exercise of rights under the GDPR and the response to the request
 - Archiving period: 5 years following the year in which the application was processed

12. The purpose of the processing of personal data is to **deal with the controller's litigation agenda, including participating in proceedings and asserting and/or defending the controller's legal claims** (litigation, enforcement, debt recovery agenda) (this purpose applies to cases where there is litigation and the assertion of your or our rights)
- Legal basis: Article 6(1)(c) of the Regulation - necessary for compliance with the LEGAL OBLIGATIONS of the controller arising in particular from Art. 160/2015 Coll., Civil Procedure Code, as amended, Art. 162/2015 Coll., the Administrative Procedure Code, as amended, Act No. No. 301/2005 Coll., the Code of Criminal Procedure as amended, Act No. No. 7/2005 Coll. on Bankruptcy and Restructuring and on Amendments and Additions to Certain Acts, as amended, Act no. 233/1995 Coll. on bailiffs and enforcement activities (Execution Code) and on amendments and supplements to other acts, as amended.
 - Data subjects: parties to contentious proceedings
 - Personal data: personal data contained in contentious proceedings, judicial and extrajudicial proceedings, enforcement and bankruptcy proceedings, etc.
 - Archiving period: 10 years following the year in which the proceedings were finally terminated

Recipients of personal data (common to all the above purposes):

- entities to which the controller provides OU on the basis of the law;
- entities cooperating contractually with the controller, in particular for the purpose of IT support, IT infrastructure management or external auditing;
- a company that provides Microsoft Office services (including Outlook, Teams);
- a provider of postal or courier services;
- professional consultants and advisers who are bound by legal and/or contractual obligations of confidentiality;
- Courts, law executor, lawyers, notaries and other public administration/power bodies and entities to which the controller provides OA on the basis of the law (litigation agenda).

We may also disclose personal data to a parent company within the Panasonic group, if required and permitted by law, to the extent necessary. In such cases, these entities will use the personal information for the same purposes and under the same terms and conditions as set out in this notice. We may also disclose your personal data to Panasonic Europe Ltd.'s IT service provider, Panasonic Information System Company Europe, which provides an adequate level of protection for the processing of personal data on our behalf. The Panasonic Companies have signed the "Panasonic Intra-Group Data Transfer Agreement / Intra-Group Data Transfer Agreement", by which they undertake to comply with all legal requirements relating to the protection of personal data.

Transfer of personal data to third countries

The controller does not primarily transfer personal data to third countries (outside the European Union/European Economic Area). However, in the context of contractual relationships, the data subjects themselves may be from third countries and personal data (in particular contact data) are also transferred in the course of mutual communication (performance of the contract).

The transfer may occur in the case of Microsoft (the supplier of Office 365 cloud services), with which the controller has an intermediary agreement. Microsoft primarily processes all personal data within the EEA, but some of its subcontractors are based in a third country such as the USA (<https://www.dataprivacyframework.gov/>). Microsoft uses standard contractual clauses or European Commission adequacy decisions as transfer tools. For more on Microsoft's privacy policy, please visit <https://learn.microsoft.com/en-us/compliance/regulatory/gdpr>.

Obligation to provide personal data

If, for any of the processing purposes, the legal basis for processing of the Personal Data is a contract, the provision of such data constitutes a contractual requirement for performance under the contract in question. In the event of failure to provide such data, neither the conclusion of the contractual relationship nor the subsequent performance of the contract is possible. Where the legal basis for the processing of personal data is the performance of a legal obligation, the provision of this data is a legal requirement. In the event of non-provision of these data, it is not possible to ensure the proper performance of PIDEU-SK's obligations under the relevant general legislation.

Automated individual decision-making, including profiling

PIDEU-SK does not process personal data for the purpose of carrying out **automated decision-making**, including **profiling**.

Rights of data subjects

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

- 1) **Right of Access to Personal Data** - upon request, to request from PIDEU-SK the right of access to personal data, i.e. the data subject has the right to obtain confirmation from the controller as to whether the personal data relating to him/her is being processed and, if so, to obtain access to that personal data and that information:
 - a) processing purposes;
 - b) the categories of personal data concerned;
 - c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
 - d) if possible, the expected period of retention of the personal data or, if this is not possible, the criteria for determining it;
 - e) the existence of the right to request from the controller the rectification or erasure of personal data relating to the data subject or the restriction of processing or the right to object to such processing;
 - f) the right to raise a complaint with the supervisory authority;
 - g) if the personal data were not obtained from the data subject, any available information as to their source;
 - h) the existence of automated decision-making, including profiling as referred to in Article 22(1) and (4) of the GDPR, and in these cases at least meaningful information about the procedure used as well as the significance and the envisaged consequences of such processing for the data subject;
 - i) where the personal data is transferred to a third country or an international organization, the data subject has the right to be informed of the appropriate safeguards under Article 46 of the GDPR relating to the transfer.

- 2) **Right to rectification of personal data** - upon request, require PIDEU-SK to correct incorrect or outdated personal data or to complete incomplete personal data.

- 3) **Right to erasure of personal data** - upon request, require PIDEU-SK to delete/eliminate the personal data if:
 - a) the personal data is no longer needed for the purpose for which it was collected or otherwise processed;
 - b) in cases where the processing of personal data was based on consent and that consent to the processing of personal data has been withdrawn, in the absence of any other legal basis for the processing of personal data or any other legal exception;
 - c) where the data subject objects to the processing of personal data on the basis of legitimate interest and no legitimate grounds for processing prevail or the data subject objects to direct marketing;
 - d) personal data is processed illegally;
 - e) to comply with the legal obligation, the personal data must be deleted.

- 4) **Right to restriction of personal data processing** - upon request, require PIDEU-SK to restrict the processing of personal data if:
 - a) the person concerned challenges the accuracy of the personal data, during the period allowing PIDEU-SK to verify the accuracy of the personal data;
 - b) the processing of the personal data is unlawful and the data subject objects to the erasure of the personal data and requests instead a restriction on its use;
 - c) PIDEU-SK no longer needs the personal data for the purposes of processing the personal data, but the data subject needs it to prove, exercise or defend legal claims;
 - d) the data subject has objected to processing pursuant to Article 21(1) of the GDPR, pending verification that the legitimate grounds on the part of the controller outweigh the legitimate grounds of the data subject.

- 5) **Right to personal data portability** - on request, to request from PIDEU-SK the personal data concerning the data subject which he or she has provided to the controller in a structured, commonly used and machine-readable format and the right to transfer those data to another controller without being prevented by the controller to whom the personal data have been provided, if:
 - a) the processing is based on consent pursuant to Article 6(1)(a) of the GDPR or Article 9(2)(a) of the GDPR or on a contract pursuant to Article 6(1)(b) of the GDPR, and
 - b) where the processing is carried out by automated means.

Note: when claiming his or her right to data portability pursuant to the preceding paragraph, the data subject shall have the right to have the personal data transmitted directly from one controller to another controller, insofar as this is technically feasible.

- 6) **Right to object to personal data processing** - applies only to the legal basis under Article 6(1)(f) GDPR - legitimate interest.

You may object to the processing of your personal data based on our legitimate interests at any time, even without giving reasons. We must properly assess the objection. Unless we can demonstrate that we have compelling legitimate grounds for the processing and that these override your interests, rights and freedoms, we will no longer process your personal data.

EXERCISE OF THE RIGHTS OF DATA SUBJECTS

The data subject is entitled to make requests in connection with the above rights at gopr@eu.panasonic.com, or by registered letter delivered to the controller - his/her DPO, or in person at the controller's registered office. In the same way, in case of any doubts and questions about compliance with the obligations related to the processing of personal data, please contact directly the DPO of the controller (contact details provided at the beginning of this document).

We will respond to your request in the form you have chosen for us to deliver your request (email or post) or you can request the form you want us to deliver your response. We will keep a record of your requests, together with details of the handling of those requests. Responses to or action taken on the basis of those requests by the data subject will be provided free of charge. If a data subject's request is manifestly unfounded or unreasonable, in particular because of its repetitive nature (repeated request), PIDEU-SK shall be entitled to charge a fee to reflect its administrative costs for providing the information or a reasonable fee to reflect its administrative costs for notifying you or for taking the requested action, or to refuse to act on such a request.

Without prejudice to any other administrative or judicial remedies, you have the right to lodge a complaint with a supervisory authority if you consider that the processing of personal data concerning you is in breach of the GDPR and the GDPR. The local competent supervisory authority is the Office for Personal Data Protection of the Slovak Republic, located at Hranicna 12, 820 07 Bratislava. In the first instance, we always recommend that you contact the DPO of the controller, who will respond promptly to your requests and questions.

The current version of this document can be found at the Controller's registered office and on the website: <https://pideu.panasonic.de/company/know-how/development-center/panasonic-industrial-devices-slovakia.html>.

Updated 02.12.2024