

Data Privacy

The processing of personal data of data subjects is governed by 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) (the "**Regulation**") and Act no. 18/2018 Coll. on Personal Data Protection and on Amendments to Certain Acts (the "**Personal Data Protection Act**").

The purpose of this information is to explain how the foundation Nadácia SPP, with its registered office at Mlynské nivy 44/a, 825 11 Bratislava, Slovak Republic, ID number: 31 818 625, registered in the Register of non-governmental and non-profit organizations, registration number: 203/Na-2002/689 (the "**Foundation**" or "**SPP Foundation**") processes the personal data of the data subjects and what their rights are under the Regulation and the Personal Data Protection Act.

Pursuant to the Regulation and the Personal Data Protection Act, the Foundation acts as a controller in the processing of personal data, i.e. as a person who, alone or jointly with others, determines the purposes and means of the processing of personal data of the data subjects. In case of any questions or requirements regarding the processing of personal data, you may contact the Foundation at the email address osobneudaje@nadaciaspp.sk.

1. How does SPP Foundation collect personal data?

The Foundation collects personal data in the following ways:

- directly from the grant beneficiaries, when concluding the grant agreement.
- from publicly available sources, such as public registers and records.
- from persons who have voluntarily provided the Foundation with their personal data and have given their consent to its processing.

The Foundation collects and processes personal data only to the extent that is reasonable for the purpose of the processing. The Foundation pays special attention to the security and protection of personal data and the rights of data subjects.

2. What is the legal basis and purpose of the processing?

The Foundation processes personal data on the following legal basis established by the Regulation and the Personal Data Protection Act:

Legitimate interest

The Foundation may process the personal data of data subjects, should this be necessary for the legitimate interests of the Foundation or of third parties, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. Such legitimate interests of the Foundation are in particular:

- protection of the rights and legitimate interests that Foundation must fulfil due to the generally binding legal regulations and contracts in relation to contractual partners and other persons; for this purpose, the Foundation retains personal data for as long as is necessary to protect such rights and legitimate interests.
- recovery of receivables and other claims of the Foundation; for this purpose, the Foundation retains personal data for a maximum of the relevant limitation periods.
- marketing and promotional activities.

Performance of the contract

The Foundation processes personal data of the data subjects for purposes related to the fulfillment of contractual obligations of both parties, in particular the conclusion, changes and termination of the agreement. The provision of personal data by the data subject in the necessary extent is a precondition for concluding such agreements. Failure to provide personal data may prevent the Foundation from providing the grant to the data subject. The Foundation retains personal data for the purposes of performing the contract for the duration of the contractual relationship between the Foundation and the data subject and the necessary time after its termination.

Fulfillment of legal obligation

The Foundation may process personal data, including their provision to state authorities and other persons, if such an obligation arises from the law. Due to the legal obligation, the Foundation may provide personal data to the Ministry of the Interior of the Slovak Republic, law enforcement agencies or other institutions. The Foundation retains personal data for the purposes of fulfillment of legal obligation for no longer than is necessary for the fulfillment of the relevant legal obligation in accordance with the generally binding legal regulations.

Consent given by the data subject

The Foundation processes the personal data of the data subjects on the basis of the consent expressly granted by the data subject. The Foundation retains personal data processed with the consent of the data subject for no longer than the duration of such consent, or until revoked, whichever is the earlier. The data subject has the right to freely withdraw his or her consent to the processing of personal data at any time. Withdrawal of consent shall not affect the lawfulness of the processing resulting from the consent prior to its withdrawal.

4. Who are the recipients of personal data?

The Foundation can entrust the processing of personal data to a third party, the so-called processors. Processors of the Foundation are, for example, persons who ensure the execution of some administrative activities for the Foundation. Processors process personal data for the Foundation exclusively on the basis of a personal data processing contract, which must meet the requirements set by the Regulation and the Personal Data Protection Act, and in such cases the Foundation strictly ensures the protection of the personal data it provides to the processors.

Processors of the Foundation in Slovak Republic and within the European Union are:

Business name: Centrum pre filantropiu n.o.

Registered office: Bašťová 5, 811 03 Bratislava

ID no.: 31 821 871

4. SPP Foundation as joint controller

The company Slovenský plynárenský priemysel, a.s., with its registered office at Mlynské nivy 44/a, 825 11 Bratislava, Slovak Republic, ID no.: 35 815 256, registered with the Commercial Register of the District Court Bratislava I, section: Sa, insert no.: 2749/B (the “**SPP**”), as the founder of the SPP Foundation, processes some personal data of grant applicants, grant recipients and other persons involved in grant implementation, for the purpose of promoting the Foundation, its activities and the SPP brand. For this purpose, SPP processes the name, surname, address and visual and audio-visual records on which the data subjects are captured. SPP and the Foundation have designated the following contact point for the data subjects: osobneudaje@nadaciaspp.sk, but the data subjects can also contact SPP directly with their requests.

5. What are the rights of data subjects?

The data subject has the right:

to require from the Foundation:

- the confirmation of whether or not its personal data is being processed; if the personal data has not been obtained from the data subject, the data subject may request the provision of any available information as to its source ("**right of access to personal data**").
- if its personal data is processed, the access to the personal data and other information and to receive a copy of the personal data that the company processes ("**the right to be informed about the processing**"); the company is entitled to charge the data subject a reasonable administrative fee in connection with the request for a copy of personal data.
- the correction of inaccurate/incomplete personal data processed by the company ("**right to rectification**").
- the erasure of personal data if any of the reasons listed in the Regulation or Personal Data Protection Act are met; especially if the personal data are no longer necessary for the purposes for which the company acquired or processed them, if the data subject withdraws consent and the company has no other legal basis for processing, if the data subject objects to the processing, or if the company processed personal data illegally; if official documents containing personal data are being processed, the data subject may request their return ("**right to erasure**").
- the restriction of personal data processing if any of the reasons listed in the Regulation or the Personal Data Protection Act are met; for example, if the data subject reports that the company is processing inaccurate personal data about it, the data subject can request that this personal data is not processed until it is corrected ("**right to restriction**").
- the provision of personal data relating to the data subject and that the data subject has provided to the company, in a structured, commonly used and machine-readable format; the data subject has the right to transfer this personal data to another controller, if it is technically possible and if the conditions specified in the Regulation and the personal Data Protection Act are met ("**right to portability**").

- to object, on grounds relating to the data subject's particular situation, to the processing of its personal data and that are necessary to fulfill a task carried out in the public interest, including objecting to profiling; to object to the processing of its personal data for the purposes of direct marketing without its consent, including profiling, to the extent that it is related to such direct marketing ("**right to object**").
- to object to being subjected to a company decision that is based solely on automated processing, including profiling, which has legal effects that concern or similarly significantly affect the data subject, unless the Regulation or the Personal Data Protection Act provide otherwise ("**automated decision-making including profiling**").
- at any time to withdraw the consent to the processing of personal data granted to the company with effects from the moment of withdrawal of consent ("**right to withdraw consent**").
- in case of suspicion that its personal data is being processed without authorization, to submit a motion to initiate personal data protection proceedings at the Office for Personal Data Protection of the Slovak Republic, with its registered office at Hraničná 4826/12, 820 07 Bratislava, Slovak Republic, phone number: + 421 2 3231 3220, www.dataprotection.gov.sk.

If the data subject does not have full legal capacity, its rights, in accordance with the Regulation and the Personal Data Protection Act, can be exercised by a legal representative. The rights of the deceased data subject pursuant to the Regulation and the Personal Data Protection Act can be exercised by its close living relative.

6. How can data subjects exercise their rights?

With regard to the possible risks of misuse and ensuring the protection of the personal data of the data subjects, the Foundation establishes means of communication by which it is possible to receive and respond to the request of the data subject in relation to its personal data that the Foundation processes. The Foundation also takes into account the technical aspects of some rights of the data subject and adapts the means of communication to ensure these rights of the data subject. In case of doubt about the identity of the data subject, the Foundation is entitled to request an additional verification of the identity.

The data subject can exercise its rights in the following ways:

- by mail (the signature of the data subject must be officially certified) sent to the address of the registered office of the Foundation.
- by e-mail to the Foundation's address osobneudaje@nadaciaspp.sk.

7. Cookies

In order to provide transparent, clear and comprehensible information about the usage of information and personal data of users of its website, the Foundation provides visitors of the website www.nadaciaspp.sk, in accordance with the provisions of § 109 Section 8 of Act No. 452/2021 Coll. on electronic communications, the following information on the use of data stored in the user's end device, the so-called cookies ("**Cookies**"). We can store or gain access to Cookies on your device only on the basis of your verifiable granted consent. Consent is not required for Cookies, which are absolutely necessary to ensure the functioning of the website www.nadaciaspp.sk.

What are Cookies?

Cookies are small data packages or small text files that are stored on your device, which you use to browse the website www.spp.sk. Cookies are used to improve the user experience on the website and to ensure some website functionality, for example, they allow us to identify that you visit our website repeatedly from your device, which allows us to offer you content that corresponds to your previous visits. Cookies also allow us to ensure the proper functioning of the website www.spp.sk and thanks to them we can improve its functionality and our services for you.

What types and for what purpose do we use Cookies?

Cookies can be divided according to the time during which they are stored on your device or according to the purpose for which they are stored.

Depending on the duration for which Cookies are stored on your device, we divide Cookies into two basic categories, namely temporary and permanent. Temporary Cookies are used only for the purpose of one specific visit to our website. They mainly serve to identify the type of your device (computer, tablet, mobile phone) when repeatedly loading parts of our website within one visit. This improves your browsing experience. After the website browser is closed, temporary Cookies are removed from your device. Permanent Cookies help us recognize you as a unique user of our website and remain stored on your device until their predetermined validity period expires or until you delete them. In addition, permanent Cookies will enable us to provide you with personalized content of our website on your next visit.

In terms of purpose, we use Cookies in several ways, based on which these Cookies are divided as follows:

Necessary (functional) cookies ensure the basic usability of the website and without their use the website would not function properly. These are, for example, functions such as website navigation and so on.

Analytic (statistical) cookies help us better understand the behavior of visitors and users of the website and thereby improve the functionality of this website. Analytical cookies can create anonymous statistics.

Marketing cookies enable the personalization of marketing content on this website. They are primarily used to display relevant advertising for the user or website visitor.

When do we use Cookies and what to do if you do not agree to their use?

We use Cookies only if you have given your explicit consent to their use through the so-called cookies banner. We do not use Cookies until you give such consent. However, consent is not required for Cookies, which are absolutely necessary to ensure the functioning of the website www.nadaciaspp.sk.

You can grant, change or revoke your consent to the use of individual categories of Cookies at any time in the Cookies settings window (the so-called cookies banner) in the "Details" section. You can reopen this window at any time using the button located in the lower corner of the website.

Please note that due to the settings of our website, the rejection to grant consent to the use of some categories of Cookies may affect its functionality and prevent you from using some functions.