

Overview of the processing of personal data of clients

according to the Regulation of the European Parliament and the Council (EU) 2016/679 on the protection of natural persons in the processing of personal data and on the free movement of such data (hereinafter referred to as the "GDPR regulation") and Act no. 18/2018 Coll. on the protection of personal data and on the amendment of certain laws (hereinafter referred to as the "Law on Personal Data").

The aim of this overview is to provide you with basic information about the processing of your personal data, if you have expressed an interest in our services or are using our services.

Complete information is available upon request at the contact address below.

Identification and contact data

The controller processing your personal data is the company INVESTMENT SERVICES, a. s., Mlynské nivy 5, 821 09 Bratislava, company ID number: 50615211, e-mail: office@investmentservices.sk (hereinafter referred to as the "controller").

In case of ambiguities, questions regarding the processing of your personal data, suggestions, or complaints, if you believe that we process your personal data illegally or unfairly, or in case of exercising any of your rights, you can contact us at any time by sending an email to: office@investmentservices.sk or in writing to the controller's address.

Contact details of the Data Protection Officer: Ing. Martin Pilka, MBA, e-mail: dpo2@proenergy.sk.

Basic overview of processing activities

We may process your personal data as part of the following processing activities (IS):

Name and description of the processing activity - purpose and legal basis, other important facts	Categories of data subjects	Categories of personal data	Deadline for erasure	Category of recipients (external)
Clients - we can process your personal data as long as you have entered into a contractual relationship with us for subscription or other activities related to securities (bonds), including the processing of relevant documents.	natural persons - clients of the controller	• ordinary personal data - identification and financial data)	duration of the contractual relationship or for the period necessary according to a special regulation	(1) other authorized entity, Tax Office, National Bank of Slovakia
AML - we can process your personal data in order to fulfill the rights and obligations of legal entities and natural persons in preventing and detecting the legalization of income from criminal activity and the financing of terrorism.	natural persons to whom the Act on Protection against the Legalization of Proceeds from Criminal Activities and Protection against the Financing of Terrorism applies, in particular: natural persons who are represented on the basis of a power of attorney and also natural persons who are authorized to act on behalf of a legal entity or a natural person, infants	• personal data (especially identification, contact, economic/property and other personal data necessary to fulfill the legal requirement	5 years from the end of the contractual relationship with the person concerned or for a period of 5 years from the execution of business with the data subject	(1) other authorized entity, the Ministry Interior of the Slovak Republic, Financial Intelligence Unit, National Bank of Slovakia
Legal agenda - we may process your personal data in order to prove, exercise or defend the legal claims of the controller or a third party in the context of lawsuits, executions (judicial debt	natural persons of the controller and processor, authorized	• personal data (especially identification, contact, economic/property	10 years from the legal end of court proceedings,	(1a,5) courts, (1b,5) executors,

Name and description of the processing activity - purpose and legal basis, other important facts	Categories of data subjects	Categories of personal data	Deadline for erasure	Category of recipients (external)
collection), extrajudicial debt collection based on a legal obligation and/or within the scope of the legitimate interest.	persons of the controller and processor, other natural persons in the position of participants in the proceedings	and other personal data found or provided during the duration of legal disputes, executions). The sensitivity of the data is determined by the subject of a lawsuit, enforcement (for example, data may be processed related to the recognition of guilt for criminal acts and misdemeanors)	execution proceedings, extrajudicial recovery	(1c,5) law enforcement authorities, (1d,5) Slovak trade inspection, (1e) other authorized entity
Whistleblowing – we can process your personal data if you have non-anonymously submitted a notification about possible whistleblowing activity, or if you are the subject of, or a participant in, an investigation into possible whistleblowing activity according to a special legal regulation.	natural persons who submitted a notification of whistleblowing activity or a request for protection upon notification of serious whistleblowing activity (or persons close to them for whom protection is requested) and natural persons who are investigated on the basis of the notification	• personal data - mentioned in the whistleblowing notification and the data necessary for its review (in particular, common identification personal data about the notifier, persons involved in the violation, details of the whistleblowing notification (may contain data of varying sensitivity)	3 years (from the date of delivery of the notification)	(1) Whistleblower Protection Office, participants in proceedings, other competent administrative authority, Slovak police force, Slovak prosecutor's office, Slovak courts, other authorized entity
Video surveillance - if you move in our monitored premises, which are marked with a camera pictogram at the entrance, you will be recorded on a camera recording, the purpose of which is to maintain safety (including crime detection), protect life, health, property and financial interests of the controller and protection of life, health and property of natural persons moving in the monitored area. The records can be used to infer responsibility towards you in case of violation of internal regulations and/or legal regulations related to endangerment or damage to property, life, health, safety, or financial interests. Processing is a legitimate interest of the controller or a third party.	persons moving in the monitored space	• personal data (ordinary - captured on camera)	7 days	(1,5) police force, other authorized entity
Technical and organizational measures - we can process records with your personal data, as part of the implementation of technical and organizational measures taken by the controller to ensure an adequate level of security, compliance with the requirements of the GDPR and prevention, or elimination of adverse consequences for the affected persons and the controller. It can be e.g. o records of employee training, confidentiality of persons who come into contact with personal data, records of your consent to the processing of personal data, records related to the processing of your requests for the exercise of rights, records related to the resolution of security incidents and violations of personal data protection, records from control activities, audits that you were a part of, records on allocation/removal of assets, access	employees, the data protection officer, applicants for the exercise of rights, persons towards whom the controller fulfills obligations arising from the GDPR regulation, persons involved in or resolved within the framework of a security incident, processors, other external entities	• personal data (ordinary - identification, contact data, which, however, may be supplemented with other necessary data of a different nature, depending on the nature of the matter - e.g. login data, data related to the behavior of the user/perpetrator (e.g. logs of logins, logouts, activities), data necessary to verify the identity of the person	According to the chapter "keeping records, archiving" of the Personal Data Protection Policy and the Personal Data Security Policy (most records are kept for 3 years or less, records on deletion or containing contracts for 5	(1a,5) Data Protection Officer, the Office for Personal Data Protection of the Slovak Republic, (1b,5) Police, Prosecutor's Office of the Slovak Republic, courts of the Slovak Republic, (1c) other authorized entity

Name and description of the processing activity - purpose and legal basis, other important facts	Categories of data subjects	Categories of personal data	Deadline for erasure	Category of recipients (external)
rights, records related to the use of allocated assets, etc. The processing is in the legitimate interest of the controller and at the same time an obligation arising from the GDPR regulation. The records can be used to infer responsibility towards you and as evidence to prove, exercise or defend the legal claims of the controller or a third party (especially in connection with a threat/violation of security, including the protection of human life and health, property, financial or property damage, interruption of activity, damage to reputation, leakage of know-how, etc.)	(such as if persons were invited to the resolved issue - consultants, auditors, lawyers,) employees of bodies on the basis of special legal regulations (e.g. employees of a supervisory body as part of consulting, control activities) and so on	who requested the exercise of the right, data resulting from violations of internal regulations (e.g. circumvention of security settings, etc.), etc.	years, some records are permanent - e.g. related to the resolution of security incidents, impact assessment, informing data subjects, etc.).	

Data from some of the aforementioned processing operations may be used in the applicable case and to the extent necessary to prove, exercise or defend our legal claims, or the legal claims of a third party (for example, providing data to law enforcement authorities, bailiffs, lawyers, etc.) as part of judicial or extrajudicial proceedings, debt collection, etc. Some personal data obtained (e.g. confirmations, records, other documents confirming the fact, etc.) may be stored and used as "evidence" for the purposes of audits, control activities by third parties, as part of the verification of the proper fulfillment of the controller's obligations in terms of legislative requirements, or other requirements (contractual, sectoral, etc.).

Your rights

As a data subject about whom we process personal data, you have rights in connection with the processing of personal data in accordance with the GDPR regulation and the Act, namely the right to request from the controller access to the personal data that is processed about you, the right to correction (or addition) of personal data, the right to delete or limit the processing of personal data, the right to object to the processing of personal data, the right to the ineffectiveness of automated individual decision-making, including profiling, the right to portability of personal data, the right to withdraw consent to the processing of personal data. If you decide to exercise some of your rights, you can use our request form, which is available in the complete information on the processing of your personal data. In case you are not satisfied with our answer, or you believe that we have violated your rights, or we are processing your personal data unfairly, illegally, etc. you have the opportunity to file a complaint - a proposal to initiate proceedings to the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic.