

Overview of Personal Data Processing

according to Regulation (EU) 2016/679 of the European Parliament and the Council on the protection of natural persons with regard to 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 amending and supplementing certain Acts (hereinafter referred to as the "Data Protection Act").

The aim of this overview is to provide you with basic information about the processing of your personal data.

Identification and contact details

The controller processing your personal data is company LOAN MANAGEMENT II, a. s., Mlynské nivy 5, 821 09 Bratislava, company registration number (IČO): 47255684, e-mail: office@loanmanagement.sk (hereinafter referred to as the "controller").

In case of any ambiguities, questions regarding the processing of your personal data, suggestions, or complaints if you believe that we process your personal data unlawfully or unfairly, or to exercise any of your rights, you can contact us by e-mail: office@loanmanagement.sk, or in writing to the controller's address.

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

1. Overview of Personal Data Processing of Clients

Basic overview of processing activities

We may process your personal data within the following processing activities (filling systems - FS):

Name and description of the processing activity - purpose and legal basis, other important fact	Categories of data subjects	Categories of personal data	Deadline for personal data erasure	Categories of recipients (external)
Protection against legalization of crime revenue and protection against terrorism financing (AML) - fulfillment of the rights and obligations of legal entities and natural persons in the prevention and detection of money laundering and terrorist financing. Personal data are processed on the basis of: Act no. 297/2008 Coll. on protection against money laundering and on protection against terrorist financing and amending certain laws.	natural persons to whom applies the Act no. 297/2008 Coll. on Protection against Money Laundering and Terrorist Financing and on Amendments to Certain Acts.	<ul style="list-style-type: none"> in the case of a natural person and in the case of a person represented on the basis of a power of attorney and also in the case of a natural person authorized to act on behalf of a legal or natural person, name, surname, birth number or date of birth if no birth number has been assigned residence or other residence, nationality, type and number of identity document and copies of official documents, in the case of a legal person, to the extent of the identification of the natural person who is authorized to act on behalf of the legal person, in the case of a minor who does not have an identity document, the name, surname, birth number or date of birth, if no birth number has been assigned, of permanent 	5 years from the end of the contractual relationship with the data subject or for a period of 5 years from the execution of the transaction with the data subject.	(1a) Ministry of Interior of the Slovak Republic, (1b) Financial Intelligence Unit, (1c) National Bank of Slovakia, (1d) authorized entities pursuant to legislation.

		residence or other residence, the nationality of the minor and his/her legal representative, • in the case of performance by third parties, taking over data and documents from a bank or financial institution.		
Legal agenda - we may process your personal data for the purpose of proving, applying, or defending the legal claims of the controller or a third party within the framework of lawsuits, executions (judicial debt collection), extrajudicial debt collection based on a legal obligation and/or within the framework of a legitimate interest.	natural persons - controllers and processors, authorized persons of controllers and processors, data subjects, other natural persons in the position of participants in the proceedings	• personal data (in particular identification, contact, economic/assets related and other personal data obtained or provided during lawsuits, executions). The sensitivity of the data is determined by the subject matter of the lawsuit (e.g. data relating to guilty criminal offenses may be processed).	10 years from the legal termination of court proceedings, execution proceedings, out-of-court recovery.	(1a,5) courts, (1b,5) executor, (1c,5) authorities active in criminal proceedings, (1d,5) Slovak Trade inspection, (1e) other authorized entity.
Clients - we may process your personal data for the purpose of concluding a contractual relationship for the subscription of securities (bonds), including the processing of relevant documents prepared by the controller.	natural persons - clients of the controller (bond subscribers).	• ordinary - personal identification data and financial data necessary to conclude a contractual relationship.	duration of the contractual relationship.	(1a) tax authority, (1b) National Bank of Slovakia, (1c) other authorized entity, (2) processor.
Camera system - if you move in our monitored premises, which are marked with a 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 protect life, health and property of persons moving in the monitored area. We respect your right to privacy and do not monitor with cameras the zones where you expect privacy - these are mainly spaces intended for rest and relaxation. The records can be used to infer responsibility towards you in case of violation of internal regulations, if we have ensured your familiarization with them, and/or legal regulations related to the threat or damage to property, life, health, safety, or financial interests. Processing is a legitimate interest of the controller or a third party.	persons present in the monitored area.	• personal data (ordinary - captured on camera record).	7 days.	(1,5) the Police Force, authorized entities pursuant to legislation.
Accounting documents - we can process your personal data in connection with the performance of the contract with you in order to fulfill accounting and tax obligations in accordance with special legal regulations.	clients / contractual partners of the controller, the taxpayers of the controller	• personal data identification, contact, financial/payment related, other data related to the performance of the contract, accounting and tax obligations.	10 years	(1a) the tax authority, (1b) auditors, (1c) authorized entities pursuant to legislation, (2) processor
Notification of anti-social activity - we can process your personal data if you have anonymously submitted a notification about possible anti-social activity, or if you are the subject of, or a participant in, an investigation into possible anti-social activity according to a special legal regulation.	natural persons who have submitted a notification of anti-social activity or a request for protection when	• personal data contained in the notification and data necessary for its examination (in particular ordinary identifying personal data of the	3 years (from the delivery date of the notification).	(1) Office for the protection of whistleblowers, participants in the proceeding, other

	<p>notifying a serious anti-social activity (or their close persons requesting protection) and natural persons who are investigated on the basis of the notification.</p>	<p>notifier, persons involved in the infringement, details of the notification (may contain data of varying sensitivity)).</p>		<p>competent administrative authority, police force of the Slovak Republic, prosecutor´s office of the Slovak Republic, courts of the Slovak Republic, other authorized entity.</p>
<p>Technical and organizational measures – with the aim of maintaining your and our security (including your personal data), proving the fulfillment of our legal obligation and proving, exercising, defending our legal claims or the claims of third parties, we may process records with your personal data. If necessary, it can be for example:</p> <ul style="list-style-type: none"> - records of your consent to data processing, - records of the fulfillment of our information obligation towards you, - records of the processing of your request, - records of permitted/allocated access and assets and their use, if we have permitted/allocated them to you, - records that are necessary as part of the investigation of security incidents and violations of personal data protection, - records (confirmations) if we trained you, - records, if you have undertaken to maintain confidentiality, - records if you were part of our control activity, audit, - other records related to the performance of adopted technical and organizational measures. <p>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 demonstrate, 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.).</p>	<p>employees, Data protection officer, claimant, persons to whom the controller fulfills the obligations arising from the GDPR Regulation, persons involved in a security incident, processors, other external entities (such as invited persons to the issue - consultants, auditors, lawyers,) employees of authorities on the basis of special legal regulations (e.g. employees of the supervisory authority within the scope of consulting, control activities), etc.</p>	<ul style="list-style-type: none"> • personal data (ordinary - identification, contact data, which can be supplemented by other necessary data of various nature depending on the nature of the case) - e.g. login data, data concerning user / offender behavior (e.g. logs of registration, logout, activities), data necessary to verify the identity of the person who requested the application of the law, data resulting from a breach of internal regulations (e.g. circumvention of security settings), etc. 	<p>According to the chapter "record keeping, archiving" of the personal data protection Policy and the Policy of security of personal data (most records are kept for 3 years or less, evidence of deletion, or containing contracts for 5 years, some records are permanently - e.g. related to security incident resolution, impact assessment, prove of informing the data subjects, etc.).</p>	<p>(1a,5) data protection officer, Office for Personal Data Protection, (1b,5) Police, Prosecutor's Office of the Slovak Republic, courts of the Slovak Republic (1c) other authorized entity.</p>

2. Overview of Personal Data Processing of Business partners

Basic overview of processing activities

We may process your personal data within the following processing activities (filling systems - FS):

Name and description of the processing activity - purpose and legal basis, other important fact	Categories of data subjects	Categories of personal data	Deadline for personal data erasure	Categories of recipients (external)
Evidence of business partners - we can process your identification and contact data if you are our business partner (or a contact person designated by him), and we need this data as part of the fulfillment of our business relationships. The legal basis is legitimate interest.	the business partners of the controller and the employees of the business partner	• personal data (ordinary - identification and contact details within the scope of the business card).	1 year	(1) authorized entities pursuant to legislation, (2) processor.
Camera system - if you move in our monitored premises, which are marked with a 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 protect life, health and property of persons moving in the monitored area. We respect your right to privacy and do not monitor with cameras the zones where you expect privacy - these are mainly spaces intended for rest and relaxation. The records can be used to infer responsibility towards you in case of violation of internal regulations, if we have ensured your familiarization with them, and/or legal regulations related to the threat or damage to property, life, health, safety, or financial interests. Processing is a legitimate interest of the controller or a third party.	persons present in the monitored area	• personal data (ordinary - captured on camera record).	7 days.	(1,5) the Police Force, authorized entities pursuant to legislation.
Legal agenda - we may process your personal data for the purpose of proving, applying, or defending the legal claims of the controller or a third party within the framework of lawsuits, executions (judicial debt collection), extrajudicial debt collection based on a legal obligation and/or within the framework of a legitimate interest.	natural persons - controllers and processors, authorized persons of controllers and processors, data subjects, other natural persons in the position of participants in the proceedings	• personal data (in particular identification, contact, economic/assets related and other personal data obtained or provided during lawsuits, executions). The sensitivity of the data is determined by the subject matter of the lawsuit (e.g. data relating to guilty criminal offenses may be processed).	10 years from the legal termination of court proceedings, execution proceedings, out-of-court recovery.	(1a,5) courts, (1b,5) executor, (1c,5) authorities active in criminal proceedings, (1d,5) Slovak Trade inspection, (1e) other authorized entity.
Accounting documents - we can process your personal data in connection with the performance of the contract with you in order to fulfill accounting and tax obligations in accordance with special legal regulations.	clients / contractual partners of the controller, the taxpayers of the controller.	• personal data identification, contact, financial/payment related, other data related to the performance of the contract,	10 years.	(1) the tax authority, auditors, authorized entities pursuant to legislation, (2) processor.

		accounting and tax obligations.		
Notification of anti-social activity - we can process your personal data if you have anonymously submitted a notification about possible anti-social activity, or if you are the subject of, or a participant in, an investigation into possible anti-social activity according to a special legal regulation.	natural persons who have submitted a notification of anti-social activity or a request for protection when notifying a serious anti-social activity (or their close persons requesting protection) and natural persons who are investigated on the basis of the notification.	• personal data contained in the notification and data necessary for its examination (in particular ordinary identifying personal data of the notifier, persons involved in the infringement, details of the notification (may contain data of varying sensitivity)).	3 years (from the delivery date of the notification).	(1) Office for the protection of whistleblowers, participants in the proceeding, other competent administrative authority, police force of the Slovak Republic, prosecutor´s office of the Slovak Republic, courts of the Slovak Republic, other authorized entity.
Technical and organizational measures – with the aim of maintaining your and our security (including your personal data), proving the fulfillment of our legal obligation and proving, exercising, defending our legal claims or the claims of third parties, we may process records with your personal data. If necessary, it can be for example: - records of your consent to data processing, - records of the fulfillment of our information obligation towards you, - records of the processing of your request, - records of permitted/allocated access and assets and their use, if we have permitted/allocated them to you, - records that are necessary as part of the investigation of security incidents and violations of personal data protection, - records (confirmations) if we trained you, - records, if you have undertaken to maintain confidentiality, - records if you were part of our control activity, audit, - other records related to the performance of adopted technical and organizational measures. 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 demonstrate, 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.).	employees, Data protection officer, claimant, persons to whom the controller fulfills the obligations arising from the GDPR Regulation, persons involved in a security incident, processors, other external entities (such as invited persons to the issue - consultants, auditors, lawyers,) employees of authorities on the basis of special legal regulations (e.g. employees of the supervisory authority within the scope of consulting, control activities), etc.	• personal data (ordinary - identification, contact data, which, can be supplemented by other necessary data of various nature depending on the nature of the case) - e.g. login data, data concerning user / offender behavior (e.g. logs of registration, logout, activities), data necessary to verify the identity of the person who requested the application of the law, data resulting from a breach of internal regulations (e.g. circumvention of security settings), etc.	According to the chapter "record keeping, archiving" of the personal data protection Policy and the Policy of security of personal data (most records are kept for 3 years or less, evidence of deletion, or contracts for 5 years, some records are permanently - e.g. related to security incident resolution, impact assessment, prove of informing the data subjects, etc.).	(1a,5) data protection officer, Office for Personal Data Protection, (1b,5) Police, Prosecutor's Office of the Slovak Republic, courts of the Slovak Republic (1c) other authorized entity.

Obligation to provide personal data

The obligation to provide personal data varies for each of the above processing operations.

In cases where the processing is based on your voluntary consent, you are not obliged to provide personal data, however, if you do not provide it you may not be able to use our service based on consent or you may not be able to benefit from it.

In cases where the processing is a legal or contractual requirement, or a task that we are obliged to perform in the public interest, you are obliged to provide us with personal data. Failure to provide it may violate the law or prevent you from using our services, as we will not be able to fulfill our legal/contractual obligations.

The provision of personal data that we process within the framework of a legitimate interest is mandatory, however, you have the right to object to such processing. We will always properly assess your request to object processing, however, it is possible that in certain cases we will not be able to comply with your request and the provision of personal data will remain mandatory. Similarly, where we carry out profiling, you have the right to ask us not to be part of it.

The transfer of personal data to a third country/international organization

The transfer of personal data to a third country/international organization is not carried out.

Profiling

Profiling is not carried out.

Additional information

Data from some of the above-mentioned processing operations may be used, where applicable and to the necessary extent, to prove, enforce, or defend our legal claims, or the legal claims of third parties (for example, providing data to law enforcement authorities, executors, lawyers, etc.), within judicial or extrajudicial proceedings, debt collection, etc. Some obtained personal data (e.g., confirmations, records, other documents confirming a particular fact, etc.) may be retained and used as "evidence" for audit purposes, third-party control activities, or for verifying the proper fulfillment of the controller's obligations under legislative requirements or other requirements (contractual, sectoral, etc.).

Your rights

As a data subject whose personal data we process, you have the following rights under the GDPR Regulation and the Data Protection Act in connection with the processing of personal data: the right to request access to your personal data being processed, the right to correct (or supplement) personal data, the right to erasure or rectification personal data processing, 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 data portability, the right to withdraw consent to the processing of personal data. If you decide to exercise any of your rights, you can use our request form, which is available upon request. If you are not satisfied with our response or believe that we have violated your rights or process your personal data unfairly or unlawfully, you have the right to file a complaint with the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic.