

Overview of Processing Personal Data of Business Partners

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 if you are our business partner.

Complete information is available upon request by the controller.

Identification and contact details

The controller processing your personal data is msg life Slovakia s. r. o., Hraničná 18, 821 05 Bratislava, Company ID: 35800780 (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 at any time by sending an email to: gdpr.sk@msg.group, or in writing to the address of the Controller.

Contact details of the Data Protection Officer supervising the processing of personal data: email: dpo3@proenergy.sk.

Basic overview of processing activities

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

Name and description of processing activity – purpose and legal basis, other important facts	Categories of data subjects	Categories of personal data	Retention period	Categories of recipients (external)
Accounting documents - we may process your personal data in connection with the fulfillment of a contract with you for the purpose of meeting accounting and tax obligations in accordance with specific legal regulations.	Clients/contractual partners of the controller, taxpayers of the controller.	Personal data: identification, contact, financial/payment, other details related to the fulfillment of the contract, accounting, and tax obligations.	10 years.	(1a) tax administrator, (1b) auditors, (1c) other authorized entity.
Whistleblowing - we may process your personal data if you submit a non-anonymous report of potential wrongdoing or if you are the subject or participant in an investigation of potential wrongdoing according to a specific legal regulation.	Natural persons who reported wrongdoing or requested protection when reporting serious wrongdoing (or their close persons for whom protection is requested), and individuals being investigated based on the report.	Personal data provided in the report and data necessary for its investigation (mainly common identification data about the whistleblower, persons involved in the wrongdoing, details of the report which may	3 years (from the receipt of the report).	(1) Office for the Protection of Whistleblowers, participants in the proceedings, other competent administrative authorities, Police Force of the Slovak Republic, Prosecutor's Office of the Slovak Republic,

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		contain various sensitive information).		courts of the Slovak Republic, other authorized entities.
Register of business partners - we may process your identification and contact details if you are our business partner (or a designated contact person), and we require this information to fulfill our business relationships. The legal basis for this processing is legitimate interest.	Business partners of the controller and employees of the business partner.	Personal data (common - identification and contact details within the scope of a business card).	1 year.	(1) other authorized entities.
Technical and organizational measures - to ensure your and our safety (including your personal data), demonstrate compliance with our legal obligations, and defend, apply, or protect our legal claims or third-party claims, we may process records with your personal data. This may include: -records of your consent to data processing. -records of fulfilling our information obligation towards you. -records of handling your request. -records of allowed/assigned accesses and assets and their use if granted to you. -records necessary for investigating security incidents and data protection violations. -records (confirmations) if you have been trained. -records if you committed to confidentiality. -records if you were part of our control activities or audit, -other records related to the implementation of technical and organizational measures. Processing is in the legitimate interest of the Controller and also an obligation under the GDPR Regulation. Records may be used to hold you accountable and as evidence to demonstrate, apply, or defend the legal claims of the	Employees, data protection officers, applicants for the exercise of rights, persons against whom the Controller fulfills obligations under the GDPR, persons involved or addressed in security incidents, processors, other external entities (e.g., if invited to address the issue - consultants, auditors, lawyers), employees of authorities under specific legal regulations (e.g., employees of the supervisory authority in consulting, control activities, etc.).	Personal data (common - identification, contact data, which may be supplemented by other necessary data of various natures depending on the issue - e.g., login data, user/culprit behavior data such as login, logout logs, actions, data necessary to verify the identity of the person requesting to exercise rights, data showing violations of internal regulations such as bypassing security settings, etc.).	According to the chapter "record keeping, archiving" of the Data Protection Policy and the Personal Data Security Policy (most records are kept for 3 years or less, records of deletion or containing contracts for 5 years, some records permanently, e.g., related to handling security incidents, impact assessments, informing data subjects, etc.).	(1a,5) Data protection officer, Authority 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 entities.

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Controller or a third party (mainly in relation to security threats or breaches, including protection of life and health, property, financial or property damage, business interruption, reputational damage, know-how leakage, etc.).				

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 available in the complete information on the processing of your personal data. 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 Authority of data protection of the Slovak Republic.