

PRINCIPLES OF DATA PROCESSING by company METRANS

Pursuant to the EU directive that provides for the processing of personal data of natural persons (*General Data Protection Regulation, GDPR*), as well as Act No. 18/2018 Coll. on the Protection of Personal Data, we are obligated to inform you of the basic principles of the processing of personal data by our company. You can find all the necessary information in this document.

1. WHO PROCESSES YOUR PERSONAL DATA?

First of all, your personal data are processed by our company, as the Controller, i.e. the subject that determines the purposes and means of the processing of personal data.

The Controller is the company **METRANS /Danubia/, a.s.**, with registered office at Povodská cesta 18, Dunajská Streda 929 01, Slovak Republic, identification number: 36 380 032, registered in the Commercial Register of the District Court in Trnava, section: Sa, insert No.: 10168/T (hereinafter referred to as “**METRANS**”).

Logistics and transport of goods in bulk containers is our primary activity.

Further, your personal data can be processed by our Processors that process your personal data on our behalf and according to our instructions. They are usually providers of technical and IT services, companies providing external accounting and personnel services, search and recruitment of new employees, delivery services, service, legal services, enforcement of claims, and other consultancy and advisory services. Individual companies and activities can be subject to a change according to current needs of our company. Your personal data can be provided to other companies from METRANS group, if necessary for the purpose of internal IT system administration, or for proper performance of our contractual obligations.

There might be certain situations that would require us to provide your personal data to other subjects in order to process them on their own behalf. They are usually state bodies and institutions that are obligated to process personal data based on the law, or companies belonging to the METRANS Group that process the personal data especially for internal administrative, accounting, tax and other purposes.

2. FOR WHAT PURPOSES WE PROCESS YOUR PERSONAL DATA?

Our primary aim is to secure logistics and transport of goods for our business partners duly and reliably and to provide the related services to them.



Your personal data is always processed to the necessary extent only and for the fulfilment of a concrete purpose only.

We collect and process your personal data if you are our business partner or customer, or if you represent any of our business partners or customers as a member of a statutory body or as an employee of such business partner or customer, etc., especially in order to fulfil our contractual obligations towards such business partner or customer. We also process your personal data if you are our employee, as you are legally obligated to provide your personal data to us for the purpose of your employment and fulfilment of the related obligations; if you are an applicant for a job in our company, we need to process your personal data in order to include you in our register of applicants and in the selection procedure; if you enter our premises, we need to process your personal data in order to protect our property and safety in the premises, including monitoring of technological situation and operation in individual container terminals, in order to report to and cooperate with public authorities during investigation of accidents and other emergency situation, fulfilment of legal obligations (reporting and information obligations, documenting of containers in and out), etc.

Your personal data is processed based on your consent also in order to send you our marketing offers, only subject to such consent. Unless you provide your consent, it shall not influence our legal relations and none of our services will be refused to be provided and you will not be disadvantaged whatsoever.

3. WHAT ARE THE LEGAL GROUNDS OF PROCESSING OF YOUR PERSONAL DATA AND DURATION OF SUCH PROCESSING?

Data Subject	Legal grounds of the processing	Duration of the processing
Statutory body members, employees, and other authorised persons of our business partners / our customers	<ul style="list-style-type: none"> - Performance of a contract towards customers (transport of goods, proper delivery thereof, complaint procedure, if relevant, etc.) - Fulfilment of our legal obligations - Our legitimate grounds for the purpose of exercise/ defence of rights and claims 	<ul style="list-style-type: none"> - During the whole period of a business contract, - Personal data are further archived over the period prescribed by the law for accounting and tax purposes, - For the purpose of exercise/ defence of claims resulting from a contract or related to the contract, - However, not later than for a period of 15 years after termination of a business relation and settlement of all related obligations resulting from the business relation (unless legal regulations state a longer period).

<p>Our job applicants</p>	<ul style="list-style-type: none"> - Fulfilment of obligations within the pre-contractual relation (employee selection procedure) - Our legitimate grounds related to registration of applicants in order to be able to contact them in case of any vacant position, which enables continual staffing and fulfilment of our business activities 	<ul style="list-style-type: none"> - During the whole selection procedure - Personal data of job applicants are archived for three years after received by our company, or three years after termination of selection procedure unless you, as a job applicant, was successful.
<p>Persons entering our premises and our buildings</p>	<ul style="list-style-type: none"> - Our legitimate grounds related to security and safety of our premises and protection of our assets - Fulfilment of our legal obligations 	<ul style="list-style-type: none"> - Camera records are maintained for one month; camera records of trucks driving in/ out of the gate (gate in/gate out cameras recording the condition of containers) for the purpose of defence of rights are maintained for two months - Visitors' book records are maintained for 6 months.
<p>Persons, whom we send marketing and business offers (e-mail, telephone, in writing) and other information related to our business activities</p>	<ul style="list-style-type: none"> - Consent to sending of marketing offers 	<ul style="list-style-type: none"> - The consent is given for the period of duration of our business relation, if we are business partners, and for another period of 7 years after termination of such business relation; in other cases, the consent is provided for 7 years - For a period specified in the law, if we are legally obligated to maintain your personal data for a certain period
<p>Our employees</p>	<ul style="list-style-type: none"> - Fulfilment of obligations resulting from an employment contract - Fulfilment of employer's legal obligations - Our legitimate grounds related to security and safety of our 	<ul style="list-style-type: none"> - Over the period of employment, period laid down by legal regulations, etc. - Our employees will receive more details upon signing the employment contract.

	premises and protection of employer's assets, etc.	
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4. WHAT ARE YOUR RIGHTS?

A) Right to withdraw your consent

As the Data Subject (the subject, whose personal data are processed) you can withdraw any consent anytime granted to the company METRANS.

B) Right to claim access to your processed personal data

As the Data Subject you can ask METRANS to confirm, whether personal data concerning you are (are not) being processed and if so, you are entitled to access your personal data processed by us.

C) Right to rectify incorrect/ incomplete personal data

As the Data Subject you have the right to ask METRANS as the Controller to rectify any incomplete or incorrect personal data concerning you without any undue delay. Keeping in mind the purpose of processing of your personal data, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

D) Right to restrict the processing

As the Data Subject you have the right to ask METRANS as the Controller, to restrict the processing of your personal data in the following cases: a) the accuracy of your personal data is contested by the Data Subject, for a period enabling the Controller to verify the accuracy of the personal data; b) the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead; c) the Controller no longer needs the personal data for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise or defence of legal claims; d) the Data Subject has objected to processing pursuant to Article 21(1) based on a legitimate grounds of METRANS as the Controller pending the verification whether the legitimate grounds of the Controller override those of the Data Subject.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the Data Subject's consent or for the establishment, exercise or defence of legal claims or for the protection of rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

The Data Subject who has obtained restriction of processing shall be informed by METRANS as the Controller before the restriction of processing is lifted.

E) Right to portability of your personal data

As the Data Subject you have the right to receive the personal data concerning you, which you have provided to METRANS as the Controller, in structured, commonly used and machine-readable format and you have the right to

transmit those data to another Controller, where: a) the processing is based on a contract, and b) the processing is carried out by automated means. As the Data Subject exercising the right to data portability, you shall have the right to have the personal data transmitted directly from one Controller to another, where technically feasible. Such right shall not adversely affect the rights and freedoms of others.

F) Right to erasure

As the Data Subject you have the right to obtain from METRANS as the Controller the erasure of personal data concerning you without any undue delay, and the Controller shall have the obligation to erase personal data without any undue delay where one of the following grounds applies: a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; b) the Data Subject withdraws consent on which the processing is based and where there is no other legal ground for the processing; c) the Data Subject objects to the processing based on legitimate grounds of the Controller and there are no overriding legitimate grounds for the processing, or the Data Subject objects to the processing based on legitimate grounds for the purpose of direct marketing; d) the personal data has been unlawfully processed; e) the personal data has to be erased for compliance with a legal obligation in Union or Member State law to which the Controller is subject.

G) Right to be forgotten

Where the Controller has made the personal data public and is obliged to erase the personal data, the Controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform Controllers which are processing the personal data that the Data Subject has requested the erasure by such Controllers of any links to, or copy or replication of, those personal data.

H) Right to object to the processing of personal data

If your personal data are processed based on the **legitimate grounds, you shall be entitled to** object to such processing. After exercising your right to object to such processing, we shall not process your personal data anymore based on legitimate grounds, unless we demonstrate compelling legitimate grounds for the processing which overrides the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims.

How will we respond to your request?

METRANS will provide a free reply to your request to exercise any of your rights of the Data Subject according to GDPR. If your request is obviously unjustified or inappropriate, especially because of its repetitive character, the Controller can either:

- (i) request reasonable fee taking into account the administration costs of providing information or notification or implementation of the requested measure, or
- (ii) refuse to act upon such request.

Based on your request we will inform you of measures we have taken based on your request without any undue delay, however not later than in one month after receiving your request. Such period can be extended, if necessary, by another two months, while in such case the complexity of such request and the number of requests must be taken into consideration. We will inform you of every extension in one month after receiving your request, while we will specify the reasons of such extension. If you file the request by electronic means, the information will be provided to you by electronic means, too, if possible, unless you as the Data Subject ask for a different way of receiving information.

I) Right to be represented

In accordance with GDPR, as the Data Subject you shall be entitled to mandate a not-for-profit body, organisation or association which is constituted in accordance with the law of a Member State, statutory objectives of which are in the public interest and which is active in the field of the protection of personal data of Data Subjects, to lodge a complaint on the Data Subject's behalf with the competent supervisory authority, to exercise the above rights on your behalf and to lodge a judicial remedy, and to exercise the right to receive any compensation on your behalf in consequence of violation of GDPR by METRANS or by any of our processors, if such mandate is allowed by law and order of the Member Country, in which your rights are being exercised.

J) Right to lodge a complaint with the Authority

Where you consider that your rights in connection with the processing of your personal data are infringed due to any reasons, you shall be entitled to lodge a complaint yourself or through your representative

Office for Personal Data Protection of the Slovak Republic

Hraničná 12, SK - 820 07 Bratislava 27

For more information, please go to the web site of the Office: www.dataprotection.gov.sk/uouu/. You shall also be entitled to lodge a complaint to authority designed to protect personal data in the Member State of your habitual residence or place of work (hereinafter referred to the "supervisory authority").

The supervisory authority with which the complaint has been lodged shall inform you on the progress and the outcome of the complaint including the possibility of a judicial remedy.

5. HOW CAN YOU EXERCISE YOUR RIGHTS ACCORDING TO GDPR?

- By sending an e-mail to address: gdpr@metrans.sk
- By mail or personally to address: METRANS /Danubia/, a.s., Povodská cesta 18, 929 01 Dunajská Streda, Slovak Republic.