

Personal data processing principles

Dear client,

In this information memorandum we would like to provide you with detailed information about the processing of your personal data for marketing purposes. To begin with, we would like to explain why we asked for your personal data processing consent for marketing purposes.

The main purpose of the above stated data processing is to offer you the latest information on current and new products and services and our business partners. Further purpose is to provide time-limited offers and practical information in writing or electronically. We strive to create personalized offers based on segmentation and profiling, and to present only relevant product and service offerings so that you are not overwhelmed with product offers that you already have or that do not meet your needs.

As Regulation No 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46 / EC, will enter into force on 25 May 2018, it is required that we receive a new approval from you that meets the new requirements.

Please read the information below on the personal data processing that we have prepared in a question form to make this information memorandum as clear and practical for information retrieval as possible. If you have any questions or comments about your consent, please call our hotline: 0800 222 221 or e-mail us at: info@sanac.sk

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1. WHO IS THE MANAGER OF YOUR PERSONAL DATA?

A personal data manager (controller) is a company that determines the purpose and means of processing personal data. For marketing purposes, your personal data manager is: Sanac, s.r.o., address Dulo vo nám. 14, 821 08 Bratislava, ID 36 284 602, registered in the Commercial Register of the District Court Bratislava I, Section Sro, File No: 39723 / B.

2. WHAT PERSONAL DATA DO WE PROCESS?

For marketing purposes, we process the following categories of personal information to help us identify products and services that you may like and address your needs.

- Basic identification data - name, registered office, date of birth, address of residence.
- Contact information - phone number, e-mail address.
- Socio-demographic data - statistics on age, gender, education, occupation, number of children.
- Information on the use of products and services - what services you used in the past, information on the use of the Internet customer zone. Based on this data, we can recommend appropriate products and services.
- Information from phone call logs or other interactions with you, such as by e-mail, chat, SMS.
- Geolocation data - geolocation data from a web browser. This information can usually be used to recommend contacting your nearest broker or affiliate.

3. WHAT SOURCES DO THE PERSONAL DATA COME FROM?

We collect the personal information listed in the previous paragraph directly from you. You include this personal information in the client agreement, or you have included it in other documents.

Personal data may also come from publicly available sources, registers and records, such as a business register. Your personal information may also come from third parties authorized to handle it.

4. FOR WHAT PURPOSE HAVE YOU PROVIDED YOUR CONSENT?

You have given your consent for marketing purposes that include:

- offer of products and services. With your consent, we may provide offers to you electronically, in particular by e-mail or messages sent to mobile devices via phone number, Web Client Zone, in writing or by telephone,
- automated processing of personal data to adjust the business offer to your individual needs
- market and customer satisfaction surveys of products and services used.

Consent for marketing purposes is voluntary. However, it is essential for us in order to send you individual offers of products and services and our business partners. We cannot provide you with individual product and service offers without your consent.

5. WHY IS PROFILING AND AUTOMATED DECISION-MAKING USED?

Our company strives to provide you with customized product and service offers. For this reason, your personal information is profiled with your consent. For this purpose we use automatic information systems, web applications or calculators. Accordingly, we send you personalized reports and offers of products and services of our company.

Automatic evaluation (profiling) of personal data will help us better recognize you and your needs, estimate future actions and adapt our products and services accordingly.

6. HOW LONG WILL WE PROCESS YOUR PERSONAL DATA?

You have given your consent to the company for the contract duration and for the next 10 years after the termination of such contract or until you withdraw your consent.

If you neither are nor will be a client of the company, your consent will be valid for 10 years from the date of its approval or until you withdraw it.

At the end of this period, your personal data will be deleted, but only to the extent and for the purposes for which no consent is required by law.

7. WHO ARE OUR BUSINESS PARTNERS?

You also consented to the offer of products and the transfer of personal data to our selected business partners. Our business partners also adhere to the private data statement and we have concluded data privacy statement with them. Up-to-date list of business partners will be sent to you upon request.

8. WHO CAN ACCESS YOUR PERSONAL DATA?

In order to process your data for marketing purposes, your data may also be accessed by other entities that process personal data as intermediaries, whose role is to provide services to the company. For example, those may be external companies that manage our systems or other services that ensure the proper functioning of the company and the processing of personal data for marketing purposes. We have concluded data privacy statement with the above mentioned intermediaries based on which they are also obliged to comply with the strict rules of personal data protection.

The transfer of your personal data to state organizations is only in accordance with the law or valid legal or judicial decisions in accordance with the legislation of the Slovak Republic.

9. WHAT ARE YOUR RIGHTS IN PERSONAL DATA PROCESSING?

Proper processing of your personal data is important for companies in the Slovak Republic and their protection is implicit. You may exercise the following rights when processing personal data:

Information about the processing of your personal data

The information includes in particular: identification and contact details of the manager, assistant manager and, where applicable, the person in charge, processing purposes, categories of personal data concerned, recipients or categories of recipients of personal data, information on the transfer of personal data to third countries, information on how long your personal data will be archived, list of authorized administrators, list of your rights, possibility to contact the Office for Personal Data Protection, source of processed personal data, information on whether and how automated decision-making and profiling occur.

Right of access to personal data

You have the right to receive confirmation whether or not personal data is processed and, if so, you have access to processing information, categories of personal data concerned, recipients or categories of recipients, periods of retention of personal data as well as the right for information about your rights, the right to file a complaint with the Office for Personal Data Protection, information on the source of personal data, information on whether there is an automated decision and profiling, information and guarantees in case of transfer of personal data to a third country or international organization. You have the right to receive copies of the processed personal data.

Right of rectification

Are we processing your outdated or inaccurate personal information? For example, have you changed your home address? Please let us know and we will correct your personal information.

Right to erasure (right to be forgotten)

In some legally stated cases, we are required to delete your personal information at your request. However, any such application is subject to an individual assessment, as Sanac, s.r.o. also has an obligation or a legitimate interest to keep personal data.

Right to restriction of processing

If you wish your personal data to be processed solely for the strictest legal purposes or to block personal data.

Right to data portability

If you wish to disclose your personal information to another company, we will pass your personal information in an appropriate format to the entity you specify, unless there are any legal or other significant impediments to doing so.

Right to object and automated individual decision making

If you find or believe that personal data is being processed in violation of your privacy or legal regulations, please contact us for clarification or correction. You can also file an objection directly against automated decision-making and profiling.

Right to lodge a complaint with the Office for Personal Data Protection

If you have a complaint regarding the processing of personal data, you can contact the Supervisory Authority, which is the Office for Personal Data Protection of the Slovak Republic, at Hraničná 12, 820 07 Bratislava 27.

Where can you exercise the rights and are they charged?

Individual rights can be exercised in the company by telephone: 0800 222 221 by sending an e-mail to: info@sanac.sk or by a written request sent to the registered office of the company or to the correspondence address: Dulovo nám. 14, 821 08 Bratislava, Slovakia.

All information and statements about the rights you exercise are provided free of charge.

In what time can you expect a response from the company?

We will provide you with comments and possible information on the action taken as soon as possible, but no later than within one month. If necessary and in view of the complexity and number of applications, we can extend this period to two months. We will inform you of the extension, including the reasons.

10. HOW CAN YOU WITHDRAW PERSONAL DATA PROCESSING CONSENT?

Consent to the processing of personal data is based on the principle of free will. This means that you can withdraw it at any time. Would you like to cease receiving product and service offers and our business partners? We fully respect your decision.

However, the right to delete your personal data is not absolute. If we need your information to comply with our legal obligations under tax laws, accounting regulations, and other special legislation; for this purpose, we will need to further process the personal data in order to fulfil our legal obligations.

What should the withdrawal of consent contain?

- Who appeals. Please provide your first and last name, home address and date of birth so that we can identify you.
- To whom you appeal. You can address your appeal to all subsidiaries, or if you want to keep sending offers from selected locations, specify only those you would like to allow or not allow to contact you.
- Information that you do not want us to process your personal data. If you would like to receive only selected offers, please specify the offers to be eligible.
- Your handwritten signature.

How can I submit an appeal?

■ Withdrawal of the consent is as easy as granting it: either by clicking the “unsubscribe” button or similar button in your e-mail campaign, or by writing to us at the contact e-mail address: office@ifana.sk.

Changes to the Privacy Policy

If we choose to change the privacy policy, we will post it on this page and notify you by e-mail.

These conditions are valid from 15.05.2018.

Contact us

If you have any questions or suggestions, please let us know.

Sanac, s.r.o.

e-mail: info@sanac.sk

phone: 0800 222 221