



MNB solutions

Personal data processing policy

MNB s.r.o.
Karpatská 8
811 05 Bratislava
Slovakia



Who processes your personal data ?

Your personal data is processed by MNB s. r. o. with registered office at Karpatská 8, 811 05 Bratislava - Staré Mesto, ID No.: 50 340 298, registered in the Commercial Register of the Municipal Court of Bratislava III, Section: Sro, Insert No.: 111638/B (hereinafter referred to as the "Controller").

In the processing of personal data by the controller, you are in the position of a data subject, i.e. a person about whom personal data concerning him or her are processed. Your personal data will be processed securely, in accordance with the security policy of the controller.

What rights do you have as a data subject ?

- **Right of access** - you have the right to be provided with a copy of the personal data we hold about you, as well as information about how we use your personal data.
- **Right to rectification** - if you believe that the information we hold is inaccurate, incomplete or out of date, please do not hesitate to ask us to correct, update or complete the information.
- **Right to erasure** (to be forgotten) - you have the right to ask us to erase your personal data.
- **Withdraw consent** - where we process your personal data on the basis of your consent, you have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of the processing of personal data we have processed about you on the basis of that consent.
- **Right to restriction of processing** - in certain circumstances you are entitled to ask us to stop using your personal data.
- **Right to data portability** - in certain circumstances, you have the right to ask us to transfer the personal data you have provided to us to another third party of your choice.
- **Right to object** - you have the right to object to the processing of your personal data based on our legitimate interests.
- **The right to file a petition for initiation of a personal data protection procedure** - if you believe that we are processing your personal data unfairly or unlawfully, you can file a complaint with the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic.
- **The right** not to be subject to **automated individual decision-making**, including **profiling**.

The controller will not carry out automated individual decision-making and may, in specific cases, carry out profiling in connection with the provision of marketing activities.

If the provision of personal data is a legal/contractual requirement, you as the data subject are obliged to provide this personal data. Failure to provide the personal data necessary for the conclusion of a contract may result in the contractual relationship not being concluded.

If you object to the processing of your personal data, you have the right to submit a complaint or request in writing to the address of the controller's registered office at Karpatská 8, 811 05 Bratislava - Staré Mesto district or by e-mail: privacy@mnbsolutions.com

Before we start processing your personal data based on our legitimate interests, we have carried out so-called comparative tests in which we have assessed the lawfulness, necessity, appropriateness, proportionality, as well as the application of appropriate safeguards to protect your rights and freedoms.



Further information of the processing of personal data

1. WEB.....4

 1.1. Contact form.....4

 1.2. Free audit report4

2. Business activity5

 2.1. Quotations5

 2.2. Contracts/orders5

 2.3. Records of clients and contact persons6

 2.4. Suppliers.....7

3. Accounting and tax obligations.....8

4. Social media.....9

5. Job seekers/ co-workers.....10

6. Exercising the rights of data subjects – data protection12

7. Pursuing legal claims.....13

8. Network report14

9. Intra-company transfer of personal data.....15

10. Cookies16

 10.1. What cookies do we process ?16

 10.2. How to give/revoke consent to the processing of personal data ?17

 10.3. How can you manage cookies ?17

11. Profiling.....18



1. WEB

1.1. Contact form

Purpose of processing	ensuring communication via the web, handling requests
Legal basis	legitimate interest within the meaning of Article 6(1)(f) of the GDPR. The main legitimate interest is to ensure effective communication via the website
Category of persons concerned	information seekers
Category of personal data	name, email address, company name, website name, subject of the message
Categories of beneficiaries	authorised persons in a contractual relationship with the controller, entities to which the controller is obliged to provide personal data by law
Time limit for erasure of personal data	10 days from the end of the month in which the request was received
Transfer of personal data to third countries or international organisations	not implemented

1.2. Free audit report

Purpose of processing	conducting the audit and providing the outputs to the interested party, providing information about the products and services
Legal basis	consent of the data subject within the meaning of Article 6(1)(a) of the GDPR
Category of persons concerned	those interested in carrying out an audit
Category of personal data	name, email address, website name
Categories of beneficiaries	authorised persons in a contractual relationship with the controller, entities to which the controller is obliged to provide personal data by law
Time limit for erasure of personal data	6 months after consent to the processing of personal
Transfer of personal data to third countries or international organisations	not implemented

2. Business activity

2.1. Quotations

Purpose of processing	preparation of quotations
Legal basis	pre-contractual relationship within the meaning of Article 6(1)(b) of the GDPR
Category of persons concerned	potential clients, person authorised to act on behalf of the potential client, contact person of the potential client
Category of personal data	name, surname, title, function, e-mail, telephone number, subject of the quotation identification data on the basis of which the person concerned can be identified, if the potential client is a PO/CSO
Categories of beneficiaries	authorised persons in a contractual relationship with the controller (collaborators), entities to which the controller is obliged to provide personal data by law
Time limit for erasure of personal data	3 months from the delivery of the quotation to the potential client, the person authorised to act on behalf of the potential client, the contact person of the potential client
Transfer of personal data to third countries or international organisations	not implemented

2.2. Contracts/orders

Purpose of processing	conclusion and management of contractual relations/orders, provision of business activities
Legal basis	contractual relationship within the meaning of Article 6(1)(b) of the GDPR
Category of persons concerned	clients, a person authorised to act on behalf of the client
Category of personal data	name, surname, title, function, e-mail, telephone number, address, data of the legal person/company on the basis of which it is possible to identify the person concerned (in particular VAT number, VAT number, VAT number), subject of the contract/order, bank details
Categories of beneficiaries	authorised persons in a contractual relationship with the controller (collaborators), entities to which the controller is obliged to provide personal data by law
Time limit for erasure of personal data	10 years from the end of the contractual relationship
Transfer of personal data to third countries or international organisations	not implemented

2.3. Records of clients and contact persons

Purpose of processing	registration of clients and contact persons
Legal basis	legitimate interest within the meaning of Article 6(1)(f) of the GDPR. The main legitimate interest is the efficient provision of communication with the contractual partner
Category of persons concerned	clients, person authorised to act on behalf of the client, contact person of the client
Category of personal data	name, surname, title, function, e-mail, telephone number, identification data of the company on the basis of which the data subject can be identified
Categories of beneficiaries	authorised persons in a contractual relationship with the controller (collaborators), entities to which the controller is obliged to provide personal data by law
Time limit for erasure of personal data	after termination of the contractual relationship
Transfer of personal data to third countries or international organisations	not implemented

2.4. Suppliers

1. Purpose of processing	conclusion and management of contractual relations with suppliers
Legal basis	contractual relationship within the meaning of Article 6(1)(b) of the GDPR
Category of persons concerned	suppliers, a person authorised to act on behalf of the supplier
Category of personal data	name, surname, title, function, e-mail, telephone number, correspondence address, identification data of the company on the basis of which the data subject can be identified
Categories of beneficiaries	authorised persons in a contractual relationship with the controller, entities to which the controller is obliged to provide personal data by law
Time limit for erasure of personal data	10 years from the end of the contractual relationship
Transfer of personal data to third countries or international organisations	not implemented

2. Purpose of processing	records of suppliers and contact persons
Legal basis	legitimate interest within the meaning of Article 6(1)(f) of the GDPR. The main legitimate interest of is the efficient provision of communication with the contractual partner
Category of persons concerned	clients, person authorised to act on behalf of the client, contact person of the client
Category of personal data	name, surname, title, function, e-mail, telephone number, identification data of the company on the basis of which the data subject can be identified
Categories of beneficiaries	authorised persons in a contractual relationship with the controller, entities to which the controller is obliged to provide personal data by law
Time limit for erasure of personal data	after termination of the contractual relationship
Transfer of personal data to third countries or international organisations	not implemented

3. Accounting and tax obligations

Purpose of processing	fulfilment of legal obligations in the field of taxation and accounting in the area of business relations
Legal basis	Act No. 431/2002 Coll. on Accounting, Act No. 595/2003 Coll. on Income Tax as amended
Category of persons concerned	clients, persons authorised to act on behalf of clients, suppliers, persons authorised to act on behalf of suppliers
Category of personal data	name, surname, bank account number (or e-mail), payment-related data, company identification data on the basis of which the data subject can be identified, if the client/supplier is a legal entity
Categories of beneficiaries	authorised persons in a contractual relationship with the controller, entities to which the controller is obliged to provide personal data by law, an intermediary ensuring the fulfilment of the controller's legal obligations
Time limit for erasure of personal data	10 years from the fulfilment of the legal obligation
Transfer of personal data to third countries or international organisations	not implemented

4. Social media

Purpose of processing	ensuring communication via social networks
Legal basis	legitimate interest within the meaning of Article 6(1)(f) of the GDPR. The main legitimate interest is to ensure effective communication
Category of persons concerned	information seekers
Category of personal data	data provided when carrying out communications via social networks
Categories of beneficiaries	authorised persons in a contractual relationship with the controller, entities to which the controller is obliged to provide personal data by law, the operator of social networks
Time limit for erasure of personal data	for as long as you are actively using your social media account
Transfer of personal data to third countries or international organisations	not implemented

5. Job seekers/ co-workers

Analysis of processing operations in the information system

1. Purpose of processing	conducting selection procedures with job/cooperation applicants
Legal basis	pre-contractual relationship within the meaning of Article 6(1)(b) of the GDPR
Category of persons concerned	job applicants/co-workers
Category of personal data	<p>Jobseekers:</p> <ul style="list-style-type: none"> name, surname, date of birth (in case of job applicants), address of residence, e-mail, telephone number, details given in the application, CV or cover letter <p>Candidates for cooperation:</p> <ul style="list-style-type: none"> name, surname, title, e-mail address, telephone number, ID number, VAT number, business name, place of business, and other identifying data of the legal entity or self-employed person, on the basis of which it is possible to identify the candidate, notes from pre-contractual negotiations, data contained in the CV, motivation letter, application for cooperation
Categories of beneficiaries	authorised persons in a contractual relationship with the controller, entities to which the controller is obliged to provide personal data by law
Time limit for erasure of personal data	<p>Job seekers:</p> <ul style="list-style-type: none"> in the case of a decision to recruit a applicant, retain personal data for 1 year from the date of the last processing operation in the recruitment process, in the event of a decision not to recruit a applicant, to destroy the personal data within 1 month after the last processing operation in the recruitment process has been carried out <p>Candidates for cooperation:</p> <ul style="list-style-type: none"> in the event of a decision to establish cooperation with a candidate, keep personal data for 1 year from the date of the last processing operation in the framework of pre-contractual negotiations, in the event of a decision not to cooperate with the interested party, to destroy the personal data within 1 month after the last processing operation has been carried out in the framework of pre-contractual negotiations.
Transfer of personal data to third countries or international organisations	not implemented

2. Purpose of processing	registration of job seekers/co-workers
Legal basis	consent of the data subject within the meaning of Article 6(1)(a) of the GDPR
Category of persons concerned	job applicants/co-workers
Category of personal data	<p>Jobseekers:</p> <ul style="list-style-type: none"> Name, surname, date of birth (in case of job applicants), address of residence, e-mail, telephone number, details given in the application, CV or cover letter <p>Candidates for cooperation:</p> <ul style="list-style-type: none"> name, surname, title, e-mail address, telephone number, ID number, VAT number, business name, place of business, and other identifying data of the legal entity or self-employed person, on the basis of which it is possible to identify the candidate, notes from pre-contractual negotiations, data contained in the CV, motivation letter, application for cooperation
Categories of beneficiaries	authorised persons in a contractual relationship with the controller, entities to which the controller is obliged to provide personal data by law
Time limit for erasure of personal data	1 year after consent to the processing of personal data
Transfer of personal data to third countries or international organisations	not implemented

6. Exercising the rights of data subjects – data protection

Purpose of processing	records of exercised rights of data subjects and breaches of protection pursuant to Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments and Amendments to Certain Acts, records of exercised rights of data subjects pursuant to Chapter III and notifications pursuant to Articles 33 and 34 of Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data
Legal basis	legitimate interest within the meaning of Article 6(1)(f) of the GDPR. The main legitimate interest is the recording of exercised rights and notifications of personal data breaches
Category of persons concerned	the data subjects concerned by the application for the exercise of the right; the data subjects affected by the personal data breach
Category of personal data	the data relevant for the exercise of the right, the data to be provided by the whistleblower when notifying the infringement
Categories of beneficiaries	authorised persons in a contractual relationship with the controller, entities to which the controller is obliged to provide personal data by law
Time limit for erasure of personal data	within 6 months of the expiry of 5 years from the exercise of the right or the occurrence of the data breach
Transfer of personal data to third countries or international organisations	not implemented

7. Pursuing legal claims

Purpose of processing	the exercise of legal claims arising from contractual relations
Legal basis	legitimate interest within the meaning of Article 6(1)(f) of the GDPR. The main legitimate interest is the exercise of legal claims.
Category of persons concerned	clients, persons authorised to act on behalf of clients, suppliers, persons authorised to act on behalf of
Category of personal data	name, surname, title, function, e-mail, telephone number, identification data of the company on the basis of which the data subject can be identified, if the client/supplier is a legal person, data specified in the order/contract
Categories of beneficiaries	authorised persons in a contractual relationship with the controller, entities to which the controller is obliged to provide personal data by law
Time limit for erasure of personal data	in the case of the right to compensation, the limitation period runs from the date on which the injured party knew or could have known about the damage and who is liable for compensation (subjective period), but ends no later than 10 years from the date on which the breach of duty occurred
Transfer of personal data to third countries or international organisations	not implemented

8. Network report

Purpose of processing	network administration (network security, information security)
Legal basis	a legitimate interest within the meaning of Article 6(1)(f) of the Regulation. The main legitimate interest is to ensure information and network security
Category of persons concerned	persons whose personal data are processed in the context of electronic data processing (the above applies to all data subjects as defined in this personal data processing policy)
Category of personal data	personal data held on designated workstations, personal data in electronic form, the processing of which is necessary for the proper safeguarding of information and network security
Categories of beneficiaries	entities to which the controller is obliged to provide personal data by law, authorised persons and other persons in a contractual relationship with the controller
Time limit for erasure of personal data	depending on the processing operation
Transfer of personal data to third countries or international organisations	not implemented

9. Intra-company transfer of personal data

Purpose of processing	intra-company transfer of personal data within a group of undertakings - internal administrative
Legal basis	a legitimate interest within the meaning of Article 6(1)(f) of the Regulation. The main legitimate interest is the internal administration of undertakings
Category of persons concerned	clients, persons authorised to act on behalf of clients, contact persons of clients, potential clients - in the case of quotations
Category of personal data	name, surname, title, function, e-mail, telephone number, correspondence address, identification data of the company on the basis of which the person concerned can be identified, subject of the quotation/contract/order
Categories of beneficiaries	authorised persons in a contractual relationship with the controller, entities to which the controller is obliged to provide personal data by law
Time limit for erasure of personal data	for the duration of the contractual or pre-contractual relationship
Transfer of personal data to third countries or international organisations	Not implemented

10. Cookies

A cookie is a small text file that a website stores on your computer or mobile device when you visit that website. Each time you visit the website, you will be prompted to accept or decline cookies. The purpose of this is to allow the website to retain information about your preferences for a certain period of time. This way, you do not have to re-enter them when you browse the website.

10.1. What cookies do we process ?

Technical cookies (required)

We need to use some cookies to ensure the operation of our website. Your consent to the processing of personal data is therefore not required in connection with the processing of these cookies.

Legal basis	legitimate interest within the meaning of Article 6(1)(f) of the GDPR. The main legitimate interest is to ensure the proper and error-free operation of the website.
Category of persons concerned	website visitors
Category of personal data	a unique identifier that is part of the cookie
Categories of beneficiaries	authorised persons in a contractual relationship with the controller, the website administrator
Time limit for erasure of personal data	more information is available by "clicking" in the cookie bar, category Details/Needed
Transfer of personal data to third countries or international organisations	not implemented

Marketing

Marketing cookies are used to track visitors to the website. The intention is to serve ads that are relevant to individual users.

Legal basis	consent of the data subject within the meaning of Article 6(1)(a) of the GDPR
Category of persons concerned	website visitors
Category of personal data	a unique identifier that is part of the cookie
Categories of beneficiaries	authorised persons in a contractual relationship with the controller, the website administrator
Time limit for erasure of personal data and other information	more information is available by "clicking" in the cookie bar, category Details/Marketing
Transfer of personal data to third countries or international organisations	the controller does not directly transfer personal data to third countries or international organisations, but its partners may do so

10.2. How to give/revoke consent to the processing of personal data ?

We can only process marketing cookies provided that you give us your free consent to such processing. You can consent to processing by "clicking" in the cookie bar depending on your preferred settings. You can withdraw your consent by "clicking" again in the cookie bar, depending on your preference to stop the processing of selected cookies.

If you wish to modify your cookie settings at a later date, including withdrawing your consent, you may do so at any time by clicking on the "Change your consent" link.

10.3. How can you manage cookies ?

You can manage the cookies set and used on our website by selecting your preferred setting in the cookie consent panel. If you wish to modify your cookie settings at a later date, including by removing your consent to cookies, you may do so at any time by clicking on the Change your consent link or by using your browser. Cookies set as a result of previous choices will remain stored in your browser, but will not be used after you revoke your consent. You can view or delete these cookies manually in your browser settings.

Removing cookies from your device

By clearing your browsing history in your browser, you can delete all cookies that are on your device. However, in this case you may lose some of the information stored.

Blocking

You can set most modern browsers to prevent all cookies from being stored on your device, but in this case you may need to manually adjust some preferences each time you visit a website. In addition, some services and features may not work properly at all.

For more information on how cookies can be managed by the most commonly used browsers, see:

Google	https://support.google.com/accounts/answer/61416?co=GENIE
Microsoft	https://support.microsoft.com/sk-sk/help/4468242/microsoft-edge-browsing-data-and-privacy-microsoft-privacy
Mozilla Firefox	https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences
Microsoft Internet Explorer	https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies
Opera	https://help.opera.com/cs/latest/
Apple Safari	https://support.apple.com/en-gb/safari

11. Profiling

When processing personal data in connection with the provision of marketing activities of the controller, profiling may occur. Profiling is any form of automated processing of personal data which consists of the use of such personal data to evaluate certain personal aspects relating to a natural person.

The aim of profiling in this case is to better identify your interests. Profiling will take place for the purpose of providing you with individually tailored offers of products and services of the controller, but only if you give us your free consent to such processing under the conditions set out above. Profiling is used in connection with the processing of "marketing cookies".

After profiling, the controller shall be able to provide the data subject with an individual offer of products or services provided by the controller based on the data collected. Profiling may therefore have an impact on the specific type and type of offer provided by the controller.

In the event that profiling occurs in the processing of data, the data subject shall have the right, inter alia, to object to the profiling, as well as the right to access the data subject to profiling. The data subject may exercise the rights in writing at the following address of the controller: Karpatská 8, 811 05 Bratislava - Staré Mesto district or by e-mail: privacy@mnbsolutions.com