

Terms and Conditions of Processing of the Company's Personal Data

Apartments Care, s.r.o.

(Text effective as of 1 January 2024)

I.

Recitals

1. This document regulates the principles of personal data protection of Apartments Care s.r.o., with its registered office at Nový Smokovec 19217, 062 01 Vysoké Tatry, ID No.: 52 222 195, registered in the Commercial Register of the District Court Prešov, Section Sro, Insert No. 37789/P (hereinafter referred to as the "Controller"), in particular the rules for obtaining, recording, providing, storing and securing personal data of the Controller's clients or other natural persons, whose personal data are processed in the Controller's information systems (in particular job applicants, employees, suppliers, users of the website, social networks, natural persons entering the monitored area of the Controller).
2. Questions, comments and requests regarding the processing of personal data, this document and the information contained therein are accepted by the Controller at the e-mail address info@aptcare.sk
3. This document specifies the purposes of personal data processing, which clearly indicate the category of data subjects, the scope of personal data processing, the legal basis for their processing, the categories of recipients as well as the period for which the controller will process these personal data.

II.

Definitions

4. The terms and abbreviations used in this document shall have the following meanings:
 - **Cookies** – small data files that are stored in a special browser clipboard on the user's computer and are necessary for some website functions such as logging in and are often used to track user behavior on the web, their use can be disabled in most internet browsers.
 - **Data subject** – a natural person to whom the personal data relates, e.g. a client of the controller, a user of the controller's website.
 - **GDPR** – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of personal data with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

- **Personal data (hereinafter referred to as "PD")** – any information relating to an identified or identifiable natural person, e.g. name, surname, address, telephone number, email address, IP address, etc.
- **Special categories of personal data** – so-called sensitive personal data – personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, and the processing of genetic data, biometric data for the individual identification of a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. The processing of this personal data is prohibited, except for the exceptions provided for in the GDPR.
- **OZ** – Act No. 40/1964 Coll., Civil Code, as amended.
- **Controller (or "we" in the relevant grammatical form)** – Apartments Care s.r.o., with its registered office at Nový Smokovec 19217, 062 01 Vysoké Tatry, ID No.: 52 222 195, registered in the Commercial Register of the District Court Prešov, Section Sro, Insert No. 37789/P, which determines the purpose and means of personal data processing.
- **Profiling** – any automated processing of personal data that is used to evaluate specific personal conditions, such as online behaviour and targeted advertising.
- **Processing of personal data** – the activity that the controller performs with personal data, such as obtaining, browsing, storing, copying, etc. Processor – a natural person or a legal entity that processes personal data for the controller on its behalf, e.g. an accounting firm.
- **Act on Whistleblowing** – Act No. 307/2014 Coll. on Certain Measures Related to the Reporting of Anti-Social Activities and on Amendments to Certain Acts, as amended.
- **Act on Residence Registration** – Act No. 253/1998 Coll. on the Registration of Residence of Citizens of the Slovak Republic and the Register of Residents of the Slovak Republic, as amended.
- **Local Taxes Act** – Act No 582/2004 on Local Taxes and Local Fee for Municipal Waste and Small Construction Waste, as amended.
- **Consumer Protection Act** – Act No. 250/2007 Coll. on Consumer Protection and on the Amendment of the Act of the Slovak National Council No. 372/1990 Coll. on Minor Offences, as amended.
- **Act on the Residence of Foreign Nationals** – Act No. 404/2011 Coll. on the Residence of Foreigners and on the Amendment of Certain Acts, as amended.
- **ZOOÚ** – Act No. 18/2018 Coll. on the Protection of Personal Data and on the Amendment of Certain Acts, as amended.
- **SOI Act** – Act No. 128/2002 Coll. on State Control of the Internal Market in Matters of Consumer Protection and on Amendments to Certain Acts.

III.

Purpose and legal basis for the processing of personal data

5. Depending on the relationship of the Data Subject to the Controller, the Controller processes various types of personal data on one of the legal bases for processing pursuant to Article 6(1) of the GDPR, as set out below.

JOB SEEKERS

6. If you are a job applicant, the purpose of processing your personal data is to assess your prerequisites for the performance of the job position to be filled, or to conclude an employment relationship with the Controller. The legal basis for such processing is the implementation of pre-contractual measures based on the request of the Data Subject pursuant to Article 6(1)(b) of the GDPR.
7. In the event that you do not succeed in obtaining the job for which you have applied, but the Controller would like to approach you with a job offer in the future, the purpose of processing your personal data is to keep records of suitable potential job applicants. The legal basis for this processing is your free and unambiguous consent to the processing of your personal data pursuant to Article 6(1)(a) of the GDPR. If you are a job seeker whose personal data is provided to us by another natural person (e.g. your acquaintance, family member, friend, etc.), the legal basis for the processing of your personal data is your written consent to the processing of personal data pursuant to Section 78 (6) of the Personal Data Protection Act. In this case, if your consent or authorization for such provision is not granted, we will not take over your personal data from the third party and will not further process it. In the case of accidentally obtained personal data that we have not requested for any purpose, we usually ensure their immediate destruction.

STAFF

8. If you are an employee of the Controller, your personal data are processed for the purpose of fulfilling the rights and obligations of the Controller arising from the established employment relationship. The legal basis for this processing of personal data is both the employment contract itself and the fulfilment of various obligations imposed on employers by special laws in the field of labour law, tax law and social security and insurance law. The legal basis for this processing is the performance of a contract pursuant to Article 6(1)(b) of the GDPR and the fulfilment of a legal obligation pursuant to Article 6(1)(c) of the GDPR.
9. If you are an employee of the Controller, in relation to which the Controller applies the employer's control mechanism established in accordance with Article 11 and Section 13 (4) of the Labour Code, your personal data are processed for the purpose of controlling the fulfilment of work duties, compliance with work discipline and/or retrospective verification of important events affecting a possible breach of your work duties and work

discipline. The legal basis for this processing is the protection of the legally protected interests of the Controller, pursuant to Article 6(1)(f) of the GDPR.

10. If you are an employee, your personal data may also be processed for the following purposes:

- keeping payroll accounting in accordance with special laws – the legal basis is the provision of Article 6(1)(c) of the GDPR in connection with Act No. 431/2002 Coll. on Accounting, as amended;
- provision of personal data to recipients in the position of a third party for the purpose of ensuring the performance of tasks entrusted to a specific employee in accordance with the provision of Section 78 (4) of the Personal Data Protection Act, as the Controller as an employer is entitled to provide your personal data of the employee or to publish your personal data in the scope of title, name, surname, job title, job title, functional title, personal employee number or employee number of the employee, professional department, place of work, telephone number, fax number, e-mail address to the workplace and employer identification data, if necessary in connection with the performance of your work duties or functional duties. The provision of your personal data or the disclosure of personal data must not impair the seriousness, dignity and safety of the employee as a data subject;
- managing internal communication with the Controller;
- statistical purposes consisting in the use of your personal data for the purpose of compiling internal statistical outputs for the internal needs of the Controller (e.g. working documents, overviews of wage costs for the given period, documents for the annual report, documents for the meetings of the Controller's bodies, etc.), where the legal basis for the processing is the provision of Article 89 of the GDPR;
- monitoring of premises accessible as well as inaccessible to the public by a camera system for the purpose of protecting the rights and legally protected interests of the Operator, protecting the Operator's property, protecting public order, increasing security and preventing crime in the monitored area. The legal basis is the provision of Article 6(1)(f) of the GDPR;
- the application of the employer's control mechanisms, with which the employee was duly acquainted in advance in accordance with Section 13 (4) of the Labour Code in connection with the legal basis under Article 6 (1) (f) of the GDPR;
- the management of the legal agenda, in the event that the plaintiff or defendant is an employee and on the other hand the Controller; the legal basis is the provision of Article 6 (1) (f) of the GDPR, as the processing is necessary to prove, exercise or defend the legal claims of the Controller;
- keeping records of motor vehicles of entrusted employees, including fleet management and settlement of insurance claims, the legal basis is a separately concluded contract (motor vehicle entrustment agreement) and the provision of Article 6(1)(b) of the GDPR; in the event that employees use a personal motor vehicle

that has been entrusted to them on a one-off basis (ad hoc), the legal basis for the processing is the performance of obligations arising from the employment contract or from the agreement concluded between the employee and the employer; Article 6(1)(b) of the GDPR.

- handling and recording the agenda of the rights of data subjects within the meaning of Articles 15 – 22 of the GDPR, in the event that the data subject is an employee, including adequate verification of identity, the legal basis is the provision of Article 6 (1) (c) of the GDPR, namely the fulfilment of the legal obligation of the Controller;
- handling the agenda of whistleblowers for the purpose of fulfilling obligations under the Whistleblowing Act; the legal basis for the processing of personal data is the provision of Article 6(1)(c) of the GDPR, i.e. the fulfilment of a legal obligation in connection with the Whistleblowing Act;

MEMBERS OF THE BODIES OF THE OPERATOR'S COMPANY

11. If you are a member of the Controller's body, the purpose of processing your personal data is to record a list of members of bodies and officials authorized to act on behalf of the company. The legal basis for the processing of your personal data is Article 6(1)(c) and (f) of the GDPR.

BUSINESS PARTNERS

12. If you are a business partner or an employee of a business partner of the Controller, the purpose of processing your personal data is the routine recording and use of basic contact details and your job function for the purposes of communication and resolution of work matters and the fulfilment of obligations arising from existing contractual relationships, or the performance of activities related to pre-contractual relationships. The legal basis for this processing is Article 6(1)(b) of the GDPR. The legal basis may also be the predominance of the legally protected interests of the Controller pursuant to Article 6 (1) (f) of the GDPR and, on the other hand, the specific provision of Section 78 (3) of Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments to Certain Acts, which supplements the GDPR in the territory of the Slovak Republic. The purpose of processing your personal data is also to manage relationships with customers and business partners, develop products, services and business activities, communicate with the Controller, provide feedback, supplier satisfaction surveys. The legal basis for this processing is the predominance of the legally protected interests of the Controller pursuant to Article 6(1)(f) of the GDPR. In the event that a financial settlement is made between us on the basis of existing legal relationships, we also process your personal data for the purpose of issuing an accounting and tax document in order to comply with a legal obligation pursuant to Act No. 431/2002 Coll. on Accounting and on Amendments to

Certain Acts, in which case the legal basis for the processing of personal data is the provision of Article 6 (1) (c) of the GDPR.

13. If you are a party to any contract or agreement concluded with the Controller, we process your data to the extent necessary for the preparation, negotiation, amendment and registration of contractual relationships, including the preparation and registration of powers of attorney. We process this data on the basis of the provision of Article 6 (1) (b) of the GDPR in conjunction with Section 78 (3) of Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments to Certain Acts.
14. If you have given your consent to the Controller, your data may be processed for the purpose of collecting data on the use of internet or mobile services provided by the Controller, using cookies, advertising IDs, or other tools of the same or similar type. The legal basis for the processing is Article 6(1)(a) of the GDPR.

TENANTS

15. If you have leased a property owned by the Operator from the Controller, we process personal data about you on the basis of the concluded lease agreement and the provisions of Article 6 (1) (b) of the GDPR. In the event that you rent real estate from the Controller or we provide you with any services, we also process your personal data for the purpose of issuing an accounting and tax document in order to comply with a legal obligation pursuant to Act No. 431/2002 Coll. on Accounting and on Amendments to Certain Acts. In that case, the legal basis for the processing of PD is the fulfilment of the Controller's legal obligation under Article 6(1)(c) of the GDPR.

CUSTOMERS

16. If you are our customer, we process the following categories of PD:
 - **Personal contact details**, such as your name, surname, permanent address, address for sending documents, email address, contact phone number, ID number, social security number, academic title, date of birth, forgotten values (e.g. wallets, clothes, bags, or electronics in our facilities, especially hotels or cable cars, etc.).
 - **Business contact details**, in particular the address of the company you represent, work email address and telephone number.
 - **Contractual data**, such as identification data and data from identification documents, the content of the contract concluded with the Controller, including all its amendments, the scope of services provided, the type of terminal equipment, its designation.
 - **Payment information**, such as bank account number, payment card number and the amount of fee-based services.

- **Correspondence and communication data**, such as e-mail correspondence, internet data transmissions and IP address.
- **Specific Personal Data**. Height and weight for safety settings.
- **Access rights**, i.e. your access rights to various applications, profiles and accounts within the IT infrastructure and chip numbers.
- **Monitoring by a camera system in accommodation facilities and information related to security**. Your access card number, information about whether you are in the premises or building of the accommodation facility, your portrait and records of your behavior or performance of activities in accommodation facilities (CCTV recordings). I will take an active approach to the recording only after a recorded security incident has been recorded.
- **Data from the identification document**: ID card or passport.
- **Identification data and data about your destination and dates of the trip**. In this case, it is a record of your name, surname, telephone contact, date and time of the start of your trip, for example, to an alpine environment and the date and time of your expected return from the trip.
- **When collecting feedback**: gender, age, occupation, education, device used, status, children, residence, interests, obtaining general data on satisfaction with the services provided.

17. The Controller will process your data for the following purposes:

- **Customer administration**. We keep personal records of all our customers and the services they use. We also make strategic decisions about offers for our customers based on the analysis of our records. The legal basis is the performance of the contract and the legitimate interest of the controller pursuant to Article 6(1)(b) of the GDPR.
- **Provision of accommodation services**. We have to ensure the registration of accommodated guests in accordance with special regulations, especially the Act on Residence Registration, the Act on the Residence of Foreigners and the Act on Local Taxes. The legal basis is the fulfilment of the Controller's legal obligation under Article 6(1)(c) of the GDPR and the performance of a contract in which you act as a contracting party pursuant to Article 6(1)(b) of the GDPR.
- **Taxes and accounting**. In order to fulfil the obligations arising from the tax law and other regulations related to financial performance, we are obliged to process certain personal data. The legal basis for this is the fulfilment of legal obligations pursuant to Article 6(1)(c) of the GDPR.
- **Claim**. FOR the purpose of fulfilling the obligations of the Operator in settling a complaint made by the customer, we are obliged to process your personal data, usually in the scope of name, surname, title, residence, telephone contact, e-mail address and nature of the complaint. The legal basis for the processing of personal data is Article 6(1)(c) of the GDPR, i.e. the fulfilment of the legal obligations of the Controller. These

obligations arise for the Operator in particular from the CC, the Consumer Protection Act, the SOI Act and other related generally binding legal regulations.

- **Dispute resolution and investigation of misconduct.** We may process personal data for the purposes of resolving disputes, complaints or legal proceedings, or if we suspect an infringement that we would like to investigate further. The legal basis is the fulfilment of legal obligations and the legitimate interest of the operator.
- **Compliance with the law.** We may need to process your personal data in order to comply with the law (e.g. matching your name with names on so-called designated party lists and complying with the Money Laundering Act) or to comply with a court order.
- **Recordings of speeches of a personal nature.** On the legal basis of legitimate interest (prevention of abuse of service and protection of property) and on the basis of the provisions of Section 12, paragraphs 2 and 3 of Act No. 40/1964 Coll. Civil Code and Section 10 (3) (a) The Operator may make images or video and audio recordings for official purposes under the Act, for artistic purposes or for the purposes of film, radio, press or television news. When making such a recording, the operator takes into account the legitimate interests of the natural persons concerned and takes care to minimize the possible interference with their privacy.
- **Customers under the age of 16.** If you have not reached the age of 16 on the date of signing the contractual documentation with our company and you want to provide our company with marketing consent, it is necessary that this action is carried out by your legal representative.
- **Monitoring by a camera system in our accommodation facilities and their premises.** The purpose is to control compliance with safety and protect the life and health of persons and the rights and legally protected interests of persons located in accommodation facilities and their premises and the operator. All areas with CCTV are properly marked with a pictogram, the operator's logo and an address with all information about the processing of personal data. The legal basis for the processing of PD is the legitimate interest of the Controller pursuant to Article 6(1)(f) of the GDPR. Unless we are legally obliged to store such data, we will delete it after 15 days.
- **Lost and found.** In case you forget your belongings in our facilities, we will be happy to hand them over to you if you require their return. For this purpose, however, we need to verify your identity and record to whom we have handed over these forgotten items. The legal basis is the legitimate interest of the Controller pursuant to Article 6(1)(f) of the GDPR, as well as the fulfilment of a legal obligation pursuant to Article 6(1)(c) of the GDPR.
- **Book of trips.** If you are going to make a trip, especially to a mountain or alpine environment, it is in our legitimate interest to know when you plan to return from it, in case a search operation is announced through the Mountain Rescue Service, which is certainly your expectation. The legal basis for the processing is Legitimate Interest.

- **COVID 19:** In the event that a generally binding legal regulation enters into force in the territory of the Slovak Republic, which will order measures in the event of a threat to public health to restrictions on operations and/or mass events and which will impose on the Operator the obligation to check the Customer's confirmation of a negative result of an antigen test for COVID-19 or another similar obligation when providing services to the Customer, the legal basis for the processing of PD will be the fulfilment of a legal obligation under Article 6(1)(c) of the GDPR.
18. The Controller may share PD with third parties in the following circumstances:
- We may share your personal information with other third parties who act on our behalf, such as a service provider. In such cases, these third parties may only use your personal data for the purposes described above and only in accordance with our instructions.
 - Our employees will have access to personal data. In such a case, access shall be granted only if it is necessary for the above purposes and only if the employee is bound by a duty of confidentiality.
 - For example, if required by law or court order, we may share your personal information with our suppliers or clients, tax authorities, social security agencies, law enforcement agencies, or other government authorities.
 - As the Controller, we protect the provided PD from unauthorized use and do not perform any operations that would make the provided personal data public or in any other way available to unauthorized persons. We undertake not to provide the collected personal data to any third parties or any other recipients, except in cases justified by law or on the basis of cases conditioned by legislation.
19. Your personal data will be located exclusively within the European Union and the European Economic Area. During the processing of PD, the Controller may perform processing operations that include the cross-border transfer of the provided personal data abroad within the Member States of the European Union, or access to this data from abroad through remote access due to the administration of the information system by a processor based in this country. During the transfer, we pay attention to the maximum security of personal data protection by encrypting and using software and hardware tools to secure the transmitted data.
20. We store your personal data for a limited period of time and this data will be deleted when it is no longer needed for the purposes of the processing, which in most cases means that we will keep your data for the duration of your relationship with us. Insofar as possible, we will delete the data during your relationship with us as soon as it is no longer required. The standard retention period for your personal data after the provision of the service is 5 years, and 10 years for the fulfilment of legal obligations under the Accounting Act and the Value Added Tax Act. In any case, we will delete your personal data no later

than the expiry of the statutory deadlines after the end of the contractual relationship, unless the legislation requires their storage. We may process your personal data for a longer period of time after the end of the relationship in the event of an ongoing legal dispute or if you have given us permission to store your personal data for a long time.

MARKETING

21. In some cases, your PD may be processed for the purpose of direct marketing by the Controller. As a rule, this will be the processing of PD in the scope of name, surname, email address, correspondence address, telephone contact or the name of a profile on a social network, for the purpose of sending newsletters, offers, photos, surveys, public opinion polls and/or surveys of the Controller.
22. We may process your PD for the purpose of direct marketing if you have given us your consent to process your PD for this purpose. The legal basis for the processing of PD in this case is the provision of Article 6(1)(a) of the GDPR.
23. If you have already used the services of the Controller in the past, and therefore you are already existing customers of the Controller, we may process your PD for direct marketing purposes on the basis of the Controller's legitimate interest pursuant to Article 6(1)(f) of the GDPR. For the purpose of direct marketing, we process your personal data on the legal basis of legitimate interest pursuant to 6 (1) (f) GDPR only in cases where the legitimate interests of the Controller outweigh the legitimate interests of the data subject. When processing personal data for the purpose of direct marketing, profiling never takes place and marketing in relation to data subjects is never personalized on our part.

VISITS

24. If you are a visitor to the building of the Controller's registered office monitored by a camera system, the purpose of processing your personal data is to protect the rights and legally protected interests of the Controller in monitoring and recording the entry of visitors to the Controller's premises, mainly for reasons of protection of the property of the Controller and other companies that have their registered office, operation and production and/or storage premises in the monitored area, increasing security and prevention against committing crime in the monitored area, an overview of the movement and entry of reliably identified natural persons into a private building. The legal basis for this processing of your personal data is the provision of Article 6(1)(f) of the GDPR.

ADDRESSEES AND SENDERS OF CONSIGNMENTS AND ENTITIES AFFECTED BY THE CONSIGNMENT IN THE ELECTRONIC MAILBOX

25. If you are a natural person to whom correspondence is addressed from us or from whom correspondence has been delivered to us, your PD is also processed for the purposes of recording the registry record pursuant to Section 16 (2) in conjunction with Section 16 (4) of the Act on Archives and Registries and handling the agenda when using the electronic mailbox used on the basis of Sections 11 and 12 of Act No. 305/2013 Coll. on the Electronic Form of the Exercise of Powers of Public Authorities and on the Amendment of Certain (e-Government Act). The legal basis for this processing is the fulfilment of a legal obligation of the Controller, i.e. Article 6(1)(c) of the GDPR.

BORROWERS

26. If you are a debtor of the Controller, your personal data are processed for the purpose of out-of-court recovery of the due receivable. The legal basis for this processing is the exercise of the Controller's right against you resulting from the performance agreed between you and the Controller within the framework of the contractual relationship, i.e. Article 6(1)(b) of the GDPR and/or the protection of the Controller's legally protected interests, i.e. Article 6(1)(f) of the GDPR.

PARTY TO THE PROCEEDINGS

27. If you are a natural person in any way (procedurally, substantively) interested in a legal matter in which the Controller acts on one of the procedural parties, your personal data are processed for the purpose of recording the legal agenda of the Controller in conducting various court proceedings, enforcement proceedings and administrative proceedings. The legal basis for this processing is the exercise of the Controller's right against you resulting from the performance agreed between you and the Controller within the framework of the contractual relationship, i.e. Article 6(1)(b) of the GDPR and/or the protection of the Controller's legally protected interests, i.e. Article 6(1)(f) of the GDPR.

WHISTLEBLOWERS

28. If you are a whistleblower, the purpose of processing your personal data is to fulfil our obligations under the Whistleblowing Act and the legal basis is the provision of Article 6(1)(c) of the GDPR.

DATA SUBJECTS EXERCISING THEIR RIGHTS

29. In the event that you are in the position of a data subject in relation to the Controller, your personal data will also be processed for the purpose of handling and recording the

agenda of the rights of data subjects in accordance with Articles 15 – 22 of the GDPR, including adequate verification of identity, the legal basis is the provision of Article 6 (1) (c) of the GDPR, namely the fulfilment of the legal obligation of the Controller.

USERS OF WEBSITES, SOCIAL NETWORKS AND COOKIES

30. If you are a visitor to one of our websites, your personal data may be processed for the purpose of contacting you back on the basis of an individually granted consent that you give when filling in the registration forms. In addition, if the settings of your internet browser allow it, so-called cookies may also be processed, of which you will be separately and transparently informed.
31. Cookies are small text files that improve the use of the website, e.g. by making it possible to recognize previous visitors when logging into the user environment, remembering the visitor's choice when opening a new window, measuring the number of visitors to the website or the way it is used for its user improvement. It is an analytics tool that helps website and app owners understand how their visitors are using these resources. Our website uses cookies for marketing purposes and to increase the user experience for website visitors. Cookies can be used for statistical data on the use of the website without personally identifying individual visitors. You can prevent these files from being stored on your device at any time by setting your web browser. We use cookies to analyze website traffic, especially through Google Analytics and Meta. If we are able to identify the person of the visitor to the web environment during the recording, this will be the processing of personal data.
32. The legal basis for the processing of PD through the website and cookies are:
 - Your consent, pursuant to Article 6(1)(a) of the GDPR, or
 - The legitimate interest of the Operator pursuant to Article 6 (1) (f) of the GDPR in monitoring activities and their evaluation is to offer the customer the best possible setting of services or support in their activities in the contractual relationship with the Operator, including direct advertising. We consider the personalization of advertising in the online environment to be our legitimate interest, which we pursue by trying to better understand the users of our website, who may be potential customers of our business partners. We also want to better understand the trends and expectations of Website users when using them. This processing may include, for example, a general analysis of customer behaviour for better marketing strategies, decisions or more individual targeted advertising; Targeted advertising of products or services; analysis of the success of various marketing campaigns (e.g. Google Analytics); Dividing users into multiple segments for more personalized direct marketing communications (if the conditions for direct marketing communications are met). In accordance with recital 47 of the GDPR, the purposes of direct marketing may be a legitimate interest. If the

right requires us to give consent in connection with the processing of so-called electronic communication metadata relating to the use of your devices or internet browser (e.g. for certain types of cookies), we allow you to give your informed consent in an unambiguous manner. Therefore, we ask you to express your will in the cookie bar in the form of your consent.

33. As part of our activities, we evaluate personal data obtained through the following types of cookies, with each individual type of file being used for a different purpose:

- Strictly necessary cookies – allow you to move around the website and use basic features such as secure areas, shopping baskets and online payments. These cookies do not collect any information about you that could be used for marketing, nor do they remember where you have navigated the internet. With their help, for example, we remember the data you have entered on orders when you scroll through different screens on a single visit to our website, we remember the goods and services you have ordered when you reach the payment screen, we find out your identity when you log in to the site and we ensure that you find the service you need on our website even if you that we would reorganize our website in some way. If you disable this type of cookie in your browser, we are not able to guarantee the full functionality of our site.
- Operational cookies - collect information about how you use our website, e.g. which pages you visit, and whether you have encountered any errors, such as in forms. These cookies do not collect any information that can be used to identify you – all data collected is anonymous and serves us only to optimize the operation of our website and to know what our users are interested in and in this way to find out how effective our advertising has been. Through operational data, we obtain statistical data on how our website is used, we determine the effectiveness of our advertising, we provide our partners with information that one of our visitors has also visited their website. This includes, for example, data about the product purchased. Based on this information, partners can improve their site, but they are strictly prohibited from using this information for subsequent advertising. Through this type of cookies, we can catch any errors and by removing them, we can improve the quality of the site as well as test various concepts of our website. Disabling them cannot guarantee the full functionality of our site.
- Functional cookies - are used to provide services or remember settings in order to ensure maximum comfort during your visit to the website. Through them, we remember what settings you have chosen, such as the graphic design, text size, preferences and colors, whether we have already asked you if you want to fill out a survey, whether we can offer you support in the form of proactive chat sessions, you will find out if you are logged in to our website. We can provide your personal information obtained through functional cookies to our partners, who can then offer you their services through our website. The data will be used solely to provide the services, products or features and nothing else.

- Persistent cookies - remain stored on your computer, laptop or mobile device even when you leave the website; Such cookies help the website remember you when you return as a visitor, while not identifying you as an individual.
 - Session cookies - are transient cookies stored on your computer, laptop or mobile device until you leave the website and are deleted at that point. Such cookies help the website remember information when you move from page to page, so you don't need to re-enter the information or fill in the information repeatedly.
 - Advertising cookies - are linked to services provided by other companies, such as the "Like" and "Share" icons. These services are provided by another company in connection with the fact that you have visited our website. Through advertising cookies, we can connect you to social networks such as Facebook, Instagram, etc., and based on the data about your visit, you will then receive advertising from other websites. We may provide data about your visit obtained through advertising cookies to advertising agencies, which will then send you advertisements that may be of interest to you.
34. Through cookies, the IP address or other online information about your devices through. This data can be indirectly linked to the possibility of identifying an individual customer. The recording of the IP address serves primarily to ensure the transmission of communications for the duration necessary for that purpose and to maintain or restore the security of electronic communications networks and services or to detect technical failures and/or errors in the transmission of electronic communications for the duration necessary for that purpose.
35. By means of cookies and/or via a web browser that you set yourself, we record and evaluate the following data when you visit the website:
- Information about your visit to our website (www).
 - Information about the IP address of the connection, browser fingerprint. This data can be indirectly linked to the possibility of identifying an individual customer. The recording of the IP address serves primarily to ensure the transmission of communications for the duration necessary for that purpose and to maintain or restore the security of electronic communications networks and services or to detect technical failures and/or errors in the transmission of electronic communications for the duration necessary for that purpose.
 - Information about your activity.
36. Through third-party tools that are on our websites, we mainly use the following cookies (name Purpose of Use):
- Google AdWords: Ensures the course of the advertising campaign and subsequent remarketing to website users.
 - Google Analytics: This is mainly the use of cookies for the purpose of compiling statistical reports on the use and traffic of our website. For more information, the

Google Terms and Conditions link is listed at the end of the text. First party cookies They are used for security purposes and also for the ability to prove consent to the processing of cookies.

- Google Inc. as well as to measure interactions with the displayed ads from Google Inc. Google Analytics to analyze your behavior on our website, we also use cookies that are stored on the device of the end user of the website (computer, tablet, smartphone). Google anonymizes part of the IP address associated with the device of the end user of our website as soon as it is collected, thus strengthening the protection of your privacy. Google Inc. uses the information collected during the use of our website to evaluate your use of our website, to provide us with reports on the activities on our website and to provide us with other services related to the use of our website and the use of the Internet. This processing of data by Google Analytics can be prevented in the Privacy Policy, link at the end of the text in the section (Software kit development).
- Database logs: They are used to block access to our Websites and to prevent fraudulent activities. Server side logs They are used to analyze application errors and for internal security purposes.

37. If you log in to our services via social networks operated by Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Port, Dublin 2 Ireland (hereinafter referred to as "Facebook"), Facebook processes your personal data on our behalf as our processor. Facebook may use cookies, web beacons and other storage technologies to collect and receive information from our websites and other places on the Internet, and use such information to provide measurement services and target advertisements. If you do not agree to this, you can object to this or you can block the processing of cookies.

38. Social networks: We assume that you are familiar with the terms of use and use of individual social networks. Our Privacy Policy only explains basic issues related to the management of our or our clients' profiles. We only have general administrator rights when processing your personal data through our profiles set up on social networks. We assume that by using social networks you understand that your personal data is primarily processed by the providers of social media platforms (such as Facebook) and that we have no control over this processing, the onward transfer of your personal data to third parties and cross-border transfers to third countries carried out by the respective providers of social media platforms and we are not responsible for it. For more information on the processing of personal data by the operators of social networks, please refer to the description below of the specific services that can be used in the professional use of social networks.

39. Social media plug-ins ("plug-ins") of social networks are integrated on our website (e.g. the "like" button on our website). When you visit our website, Facebook receives the information that you have visited the website with your IP address. If you click on the

"like" button or the Facebook icon available on our website while you are logged in and/or registered to your Facebook account at the same time, the content of the website will be redirected to your Facebook profile. Subsequently, Facebook can associate your visit to the website with your user account. Facebook stores the data collected about you as user profiles and uses it for its own purposes of advertising, market research and/or to tailor its services and tools to registered users. Such an evaluation is carried out in particular in order to inform other Facebook users about your activities on our website. You have the right to object to the creation of such user profiles, and you must contact Facebook to object. For more information on the purpose and scope of the data collection and processing by Facebook, please refer to Facebook's Privacy Policy.

40. When managing our user profiles set up on the Facebook social network, your personal data may also be processed for statistical purposes. When you visit our Facebook profiles, Facebook records, among other things, your Internet IP address as well as other information stored on your computer in the form of "cookies". This information is used to provide us as the operator of the Facebook pages with statistical information about the use of the Facebook page. More information about these statistical information ("insights") can be found at the link at the end of the text. For this processing, we act as joint controllers with Facebook. The basic elements of the Joint Controllers Agreement can be found in the link at the end of the text.

41. We also inform you that we may use services provided by Facebook, which are referred to as "data file custom audiences" – audience management for the implementation of advertising campaigns, whereby the data processed by us may be combined with personal data processed in Facebook's databases, and "measurement and analytics", in which Facebook processes personal data on our behalf in order to measure the performance and reach of our advertising campaigns and provide us with user reports, who have seen and interacted with our advertising content. This processing of your personal data may therefore take place if you interact with our advertising content or our website as part of the use of your Facebook user profile. In such cases, we use Facebook as a processor, whereby the following legal safeguards apply to the processing of your personal data: <https://www.facebook.com/legal/terms/businessstools>, <https://www.facebook.com/legal/terms/dataprocessing>. If you are hindered by the processing of personal data explained above, you can object to it or you can also use the available self-regulatory tools developed for the online marketing sector, which are available here: <http://www.aboutads.info/choices> and <http://www.youronlinechoices.eu/>). These online tools allow you to automatically identify and delete third-party digital identifiers (including those from Facebook) in your browser, thereby preventing any processing of your personal data.

42. In some cases, we are obliged to provide the so-called data related to electronic communication, including the so-called electronic communication metadata including the User's IP address, which we have obtained through the website and/or cookies to authorized public authorities in the performance of their tasks and obligations under special laws (e.g. police authorities in the investigation of criminal offences) or in the reporting of facts related to the suspicion of committing criminal offences. The legal basis for the processing of PD is Article 6(1)(c) of the GDPR.
43. If you are interested in changing your preferences, browser settings and cookie settings, or you want to delete cookies from your browser or device, you can find instructions here:
- Internet Explorer - <http://windows.microsoft.com/sk-SK/windows-vista/Block-or-allow-cookies>
 - Safari - <http://www.apple.com/>
 - Opera - <http://help.opera.com/Windows/10.20/sk/cookies.html>
 - Mozilla Firefox - <http://support.mozilla.org/sk/kb/povolenie-zakazanie-cookies>
 - Google Chrome - <https://support.google.com/chrome/answer/95647?hl=sk&hlrm=en>
44. Browsing data stored according to the cookie setting is not stored in our systems for the duration of the consent. We store the information we associate with cookie data according to your consent that you have provided to us or according to the duration of the contractual relationship between us and you.

IV.

Processors, recipients of personal data and transfer of personal data

45. When processing your PD, we also use the services of verified and contractually bound external business partners who help us process and protect your PD. These are the so-called recipients and processors who develop and maintain functional and secure systems for the Controller or supply us with the necessary software solutions or other services that are necessary for part of the processing of your personal data for the above purposes.
46. The recipients of the PD of the data subjects are the Controller's employees and business partners who have the status of the Controller's suppliers, who are regularly trained on the procedures for lawful and secure processing of your personal data. All recipients in the position of intermediaries are legally obliged to maintain confidentiality about your personal data.
47. We may also provide your personal data to other entities to the extent necessary in the performance of our legal obligations under the relevant legal regulations to the extent necessary (e.g. the Ministry of the Interior of the Slovak Republic, the Social Insurance

Agency, health and other insurance companies, tax offices, the Office of Labour, Social Affairs and Family, Labour Inspectorates, SOI, etc.).

48. In the case of suppliers who process your personal data as processors for the needs of the Controller, the Controller has ensured an increase in legal guarantees for the protection of your personal data by concluding a contract in accordance with Article 28(3) of the GDPR. The main groups of our intermediaries include: companies providing OHS and OHS services, companies providing registry and archiving management services, external companies providing services in the development and support of internal systems, cloud service providers, business partners and suppliers providing administrative support services and/or taking professional photographs. Further information about our current providers can be provided to you at any time by our responsible person on request.
49. We will never disclose your personal data to any third party or recipients for any commercial or non-commercial purpose, except for exceptions related to the enforcement of our rights against you, or to the extent that you have been informed of such disclosure. Your personal data may be provided to third parties or recipients, which are in particular postal delivery companies, law firms, courts and bailiff's offices involved in the process of enforcing our receivable against you, in the event that you do not meet your due financial obligations to the Controller and do not respond positively to our offer of out-of-court settlement.
50. We are also obliged to provide your personal data to authorized public authorities in the event of the exercise of their legal powers under the relevant special laws (e.g. police investigations, etc.), which, however, do not have the status of recipients within the meaning of the GDPR.
51. We do not transfer your personal data to any third country that does not ensure an adequate level of protection of your personal data, except in cases where our vetted processors are based in a third country outside the EU/EEA. In this case, we guarantee that we have ensured that the appropriate safeguards in Article 44 et seq. of the GDPR are in place.
52. Your personal data is not processed exclusively by automated means (e.g. exclusively by software), but is always carried out by our trained and instructed employee. Therefore, the Controller does not carry out such processing operations on the basis of which a decision with legal effect or other substantial impact on your person would be made, which would be based exclusively on fully automated processing of your personal data.

In.

Period of personal data processing

53. Your personal data is always processed only for the necessary period of time. Most often, all your personal data processed by the Controller in a secure manner will be destroyed immediately after the settlement of our contractual obligations or after the withdrawal of your consent to the processing of personal data, or after the expiry of a reasonable period of time defined by the Controller with regard to the principle of storage minimization pursuant to Article 5(1)(e) of the GDPR.
54. If you are interested in information about the specific retention period of your personal data, please contact us using the contact details provided in this document.
55. The Controller shall ensure the deletion of personal data without undue delay after:
- a) all contractual relations between you and the Controller have been terminated; and/or
 - b) all your obligations to the Controller have ceased to exist; and/or
 - c) all your complaints and requests have been handled; and/or
 - d) all other rights and obligations between you and the Controller have been settled; and/or
 - e) all processing purposes set out by law or the purposes of processing for which you have given us consent have been fulfilled, if the processing was carried out on the basis of the consent of the data subject; and/or
 - f) the period for which consent was given has expired or the data subject has withdrawn his or her consent; and/or
 - g) the data subject's request for the erasure of personal data has been complied with and one of the reasons justifying the granting of this request has been met; and/or
 - h) the decisive legal fact for the termination of the purpose of processing has occurred and at the same time the protective retention period defined with regard to the principle of minimizing the period of storage of personal data has expired.
- and at the same time the legitimate interest of the Controller does not exist, all obligations of the Controller set out in generally binding legal regulations that require the storage of personal data of the data subject (in particular for the purposes of archiving in the public interest, tax audit, etc.) have ceased to exist, or which could not be fulfilled without their storage.
56. In any case, we do not systematically process any randomly obtained personal data for any purpose defined by the Controller. If possible, we will inform the data subject to whom the accidentally obtained personal data belongs about their accidental collection and, depending on the nature of the case, we will provide him with the necessary cooperation leading to the restoration of control over his or her personal data. Immediately after these necessary actions aimed at resolving the situation, we will immediately dispose of all accidentally obtained personal data in a secure manner.

VI.

Specific provisions

57. If the legal basis for the processing of your personal data is the fulfilment of our legal obligation under Article 6(1)(c) of the GDPR and you refuse to provide us with your personal data, this may lead to damage that we can claim compensation against you (e.g. if a sanction is imposed on us in a causal connection with the failure to comply with our obligation). In the case of the processing of personal data for the purpose of fulfilling obligations under Act No. 307/2014 Coll. on Certain Measures Related to the Reporting of Anti-Social Activities and on Amendments to Certain Acts, failure to provide the whistleblower's personal data does not result in the failure to investigate the anonymous complaint. The consequence of filing an anonymous complaint is that we will not inform you about the result of its investigation.
58. If the legal basis for the processing of your personal data is the conclusion or performance of a contractual relationship and you refuse to provide us with your personal data, this may lead to the impossibility of entering into a binding contractual legal relationship with the Controller.
59. If the legal basis for the processing of your personal data is consent to processing pursuant to Article 6(1)(a) of the GDPR, you may withdraw it at any time, and you are entitled to use the same method in which you gave us your consent. The Controller never makes the granting of consent to the processing of personal data for the required purposes conditional on the possibility of concluding a contractual relationship. The Controller always guarantees you that you will not give consent to the processing of your personal data for purposes that are not related to the conclusion or performance of the contractual relationship that you as our customer are interested in concluding with the Controller. If you have any doubts about how to proceed when withdrawing your consent to the processing of personal data, please contact us using the contact details provided in this document.
60. If the legal basis for the processing of your personal data is the preponderance of our rights and legally protected interests and we use the legal basis for the processing of your personal data pursuant to Article 6(1)(f) of the GDPR, you are obliged to tolerate this processing, but you have the right to object to it.

VII.

Rights of the data subject in connection with the processing of PD and contact details of the Controller

61. Right of access to personal data

The data subject has the right to request from the Controller on the basis of a request confirmation as to whether his or her personal data is being processed and, if so, to request the provision of information on the processing of personal data concerning the data subject. The right of access to personal data must not adversely affect the rights of other natural persons.

62. Right to rectification of personal data

The data subject has the right to rectify personal data concerning him/her, taking into account the purpose of the processing of personal data and to complete incomplete personal data.

63. Right to data portability

In the case of the processing of personal data on the legal basis of a contract or the consent of the data subject, the data subject has the right to the portability of personal data concerning him or her that he or she has provided to the Controller, in a structured, commonly used and machine-readable format, if the personal data of the data subject is processed in an automated form and before the expiry of the personal data retention period. The exercise of this right must not have adverse consequences for the rights of other persons and does not automatically lead to the deletion of the personal data of the data subject.

64. Right to liquidation of personal data

The data subject has the right to delete personal data (right to erasure of personal data) that are the subject of processing, if:

- a) the personal data is processed in violation of the law, or
- b) on the basis of the withdrawal of the consent of the data subject (in the case of processing personal data on the legal basis of the consent of the data subject), or
- c) the data subject objects to the processing of personal data processed on the legal basis of the Controller's legitimate interest and the Controller's legitimate reasons for the processing of personal data do not prevail, or
- d) the personal data are no longer necessary for the purpose for which they were collected or for which they were otherwise processed, or
- e) after the expiry of the period of processing and storage of personal data.

The right to liquidation of personal data does not apply if the processing of personal data is still necessary for the Controller to:

- a) exercising the right to freedom of expression, or
- b) exercising the right to information;
- c) fulfilment of obligations under the PPO or other generally binding legal regulation,
- d) assertion of the Controller's legal claim,

- e) for archiving, scientific purposes, historical research or statistical purposes pursuant to Section 78(8) of the ZOOÚ, if the right to erasure is likely to make it impossible or seriously difficult to achieve the objectives of such processing.

65. Right to restriction of processing of personal data

The data subject has the right to restrict the processing of personal data if:

- a) the data subject objects to the accuracy of the personal data, during the period enabling the Controller to verify the accuracy of the personal data and any update of the personal data,
- b) the processing of personal data is unlawful and the data subject objects to 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 purpose of processing the personal data, but the data subject needs them to exercise a legal claim, or
- d) the data subject objects to the processing of personal data pursuant to Section 27 (1) of the PDPA, until it is verified whether the legitimate reasons on the part of the Controller outweigh the legitimate reasons of the data subject,

If the Controller restricts the processing of personal data of the data subject, the data subject will be duly informed of the revocation of such restriction.

66. Right to object to the processing of personal data

The data subject has the right to object to the processing of personal data if:

- a) it concerns the processing of personal data in all cases where the legal basis for the processing of personal data is the legitimate interest of the Controller or the public interest.
- b) these personal data are processed for the purpose of direct marketing, including profiling, to the extent that it is related to direct marketing.

If the Controller is not able to demonstrate its necessary legitimate interest in the processing of the data subject's personal data, which outweighs the rights or legitimate interests of the data subject, it will no longer process the personal data of the data subject. If the data subject objects to the processing of personal data for the purposes of direct marketing (including profiling), the Controller will no longer process the personal data of the data subject for this purpose. If the data subject (service user) is denied the opportunity to register for the service provided by the Operator (newsletter or user account), the data subject may contact the administrator of the relevant service or the Operator directly.

67. Right to initiate proceedings on the protection of personal data

In the event of suspicion that personal data are being processed unlawfully, the data subject has the right to file a motion for the initiation of personal data protection proceedings with the Office for Personal Data Protection (<https://www.dataprotection.gov.sk>), which supervises the fulfilment of obligations

arising from generally binding legal regulations governing the processing of personal data in the territory of the Slovak Republic or at the competent supervisory authority for personal data protection in another Member State of the European Union, in which the person concerned resides.

68. The right not to be subject to automated individual decision-making processes, including profiling

The data subject has the right not to be subject to a decision

- a) is based solely on automated processing and
- b) has legal effects concerning or similarly significantly affecting the data subject.

The right not to be subject to automated individual decision-making processes, including profiling, includes:

- a) the right to human intervention by the operator;
- b) the right to express your opinion;
- c) the right to challenge such a decision.

Exceptions not to be subject to automated individual decision-making processes, including profiling, are possible if the decision:

- a) necessary for the conclusion or performance of a contract;
- b) permitted by the law of the European Union or of a Member State of the European Union;
- c) based on the explicit consent of the data subject.

69. Right to withdraw consent to the processing of personal data

If the legal reason for the processing of the personal data of the data subject is his/her consent, the data subject may withdraw such consent at any time free of charge at the email address below. The withdrawal of consent does not affect the lawfulness of processing based on the consent given before its withdrawal. The data subject has the right to withdraw consent at any time via e-mail at the_address_info@aptcare.sk or in writing to the address of the Operator's registered office, namely the Slovak Tourist Club with its registered office at Záborského 33, 831 03 Bratislava. In its notification of withdrawal of consent, it is appropriate to specify precisely which consent granted by the data subject to the Controller is the subject of the withdrawal, so that the Controller can process the withdrawal of consent in the shortest possible time. When communicating with the data subject, the Controller is obliged to verify the personal data of the data subject so that the data subject can be clearly identified. For the purpose of accurate identification of the data subject, the Controller is entitled to request additional information from the data subject so that it can be determined without doubt that the personal data of the data subject has not been misused and the Controller communicates directly with the data subject. The Controller will respond to data subjects' questions

regarding the processing of personal data within one month of receipt of the request, free of charge. In cases where it is not possible to answer the questions of the data subject within one month of the receipt of the request, the Operator has the right to extend this period by another two months, even repeatedly. The Operator shall notify the data subject of any such extension of the deadline, together with the reasons for such extension, within the deadline for processing the request. If the request of the data subject is manifestly unfounded or disproportionate, in particular due to its repetitive nature, the Operator has the right to demand payment of an appropriate administrative fee from the data subject, or to refuse to act on the basis of such a request.

70. Contact details of the Controller's data protection officer:

The Data Protection Officer is a person designated by the Controller who performs tasks under the GDPR and the PDPA. Any comments and questions on the protection of personal data, as well as any suggestions and requests regarding the exercise of the rights of data subjects or other submissions related to the protection of personal data, can be sent to the Controller via the following contacts:

- a) Correspondence address: Nový Smokovec 19217, 062 01 High Tatras, Slovak Republic
- b) Emailová adresa: info@aptcare.sk
- c) Phone Number: +421 919 211 077

VIII.

Final provisions

- 71. The Controller has created these Terms and Conditions for the Processing of Personal Data in order to strengthen sufficient transparency and explanation of the basic rules it follows in protecting the privacy and personal data of data subjects.
- 72. These Terms and Conditions of Personal Data Processing may be supplemented by individual terms and conditions of personal data processing, which will be adopted in order to strengthen the principle of lawfulness, transparency and fair processing of personal data for partial processes in which personal data of specific groups of data subjects are obtained in specific situations. In the event of conflicts, the most current version of any privacy terms will always prevail. The individual terms and conditions of the protection of privacy shall take precedence over the general terms and conditions of the protection of privacy in relation to those data subjects to whom they are addressed.
- 73. The Company regularly revises and updates these Personal Data Processing Terms, and the current version of the Personal Data Processing Terms is always in force. published on the Operator's website.