

General Principles of Personal Data Protection

PYRONOVA group

Dear reader,

the companies of the PYRONOVA group have prepared this document for you to familiarize you with the latest legislation concerning the protection of your personal data and the fulfillment of its duty to inform.

The PYRONOVA group in other areas and in the area of personal data protection is dedicated to maximizing the security of your personal data and provides a transparency guarantee with regards to their handling.

1. Why did we complete this document?

New legislation has come into effect concerning the protection of your personal data that requires us to inform you of what we do with your data and to provide you with other relevant information.

The specific regulation involved is Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, also known as **GDPR**. The acronym used in the text below is "GDPR".

2. Who are we?

We are the companies of the PYRONOVA group, the main line of business of which is fire protection activities. The following companies are in the PYRONOVA group:

- **PYRONOVA s. r. o.**, with registered office at Landererova 8, 811 09 Bratislava, Slovakia
- **PYRONOVA IS, s.r.o.**, with registered office at Studniční 248/18, 617 00 Brno, Czech Republic
- **PYRONOVA IS SRL**, with registered office at Calea Turzii 192, 400495 Cluj-Napoca, Romania
- **PYRONOVA IS Hungária Kft.**, with registered office at Építők útja 2 – 4, 2040 Budaörs, Hungary
- **PYRONOVA IS Deutschland GmbH**, with registered office at Würzburger Straße 8, 30880 Laatzen, Germany

- **PYRONOVA IS D.O.O. Novi Sad**, with registered office at August Cesarca 18, 21000 Novi Sad – Grad, Serbia

Per the GDPR, any party that decides to conduct activities that includes any processing of personal data and specifies the purposes and means of such processing is classified as a **controller**.

Therefore, if you have provided your personal data (first and last name, etc.) to any of the above companies for the purposes of concluding a purchase agreement, etc., the above company functions as a controller with respect to you, and you are assigned the role of data subject. Per the GDPR, a data subject is a **natural person** whose personal data is processed.

As a data subject, you may exercise your rights as specified below with respect to the company or contact the company for more information on the processing of your personal data.

3. How can you contact us?

Contact any PYRONOVA group company that functions as a controller using the following contact details:

- PYRONOVA s. r. o. via email: gdpr.sk@pyronova.com or by calling +421 33 5555 777
- PYRONOVA IS, s.r.o. via email: gdpr.cz@pyronova.com or by calling +420 513 034 770
- PYRONOVA IS SRL via email: gdpr.ro@pyronova.com or by calling +40 3644 087 44
- PYRONOVA IS Hungária Kft. via email: gdpr.hu@pyronova.com or by calling +36 23 782 392
- PYRONOVA IS Deutschland GmbH via email: gdpr.de@pyronova.com or by calling +49 511 2030 0754
- PYRONOVA IS D.O.O. Novi Sad via email: gdpr.rs@pyronova.com

All of these companies may also be contacted by mail addressed to their registered offices specified above.

4. What personal data do we process?

Let's first define personal data. **Personal data** is any information concerning a **natural person** by means of which they may be directly or indirectly identified. Personal data includes their first name, last name, type and address of residence, date of birth, birth number, email address, phone number, signature and location-related data or their online identifier, photograph, voice recording, etc. Any data that is specific to the physical, physiological, genetic, mental, economic, cultural or social identify of a natural person is considered personal data.

Every PYRONOVA group company processes the personal data necessary to perform its business activities and other related activities to fulfill statutory and contractual obligations and following its legitimate interests.

The following categories of personal data are processed:

- **Basic identification data:** title, first name, last name, date of birth, birth number, address of permanent or temporary residence, photograph, audio-visual recording, citizenship, nationality, signature, identification of their employer/company, job title or position, place of work, place of business and identification number in the case of a trade license holder.
- **Contact data:** phone number, email address, fax, and mailing address.
- **Transaction data:** bank name, account number at the bank.
- **Socio-demographic data:** indirectly age and gender.
- **CCTV system:** CCTV recordings showing a data subject that permits their identification, the behavior and actions of the data subject, including, indirectly in certain cases, specific categories of personal data even if not required or the company's intention (e.g. health condition, race and ethnic origins, religious or philosophical convictions).

Your **additional** personal data may also be processed, for instance if you are a candidate for employment in any PYRONOVA group company, additional personal data may also be processed in the scope of your provided CV and cover letter, **or**, if you are a former employee in any PYRONOVA group company, such additional personal data as required local legislation, currently or in the past, is processed.

Every PYRONOVA group company follows the principle of minimizing data when processing personal data, which specifically means using an adequate scope of data with respect to the purpose of processing.

You may request a **transcript** of your personal data that a PYRONOVA group company processes at any time using the contact details provided above.

5. Where do we get your personal data?

PYRONOVA group companies obtain personal data:

- directly from you at conclusion and during performance of an agreement or contract, or upon obtaining your consent to process your personal data;
- from other entities if you grant your consent (e.g. from a family member);
- from proceedings involving public authorities and bodies;
- from publicly accessible registers, lists and records.

6. Why do we process your personal data?

This part of the document provides details as to the purposes for which PYRONOVA group companies process your personal data. The section is divided by the entities whose data is handled for easier orientation and better understanding of the issue at hand. **Please note** that you may fall under several categories at the same time (e.g. a client who sends us a letter is considered a client and a sender). PYRONOVA group companies maintain the same procedures for processing your personal

data and are subject to internal policies applied by the entire PYRONOVA group. As such, the following purposes of processing your personal data sorted by category are the same for all PYRONOVA group companies.

An exception is granted for the processing of personal data by the CCTV system operated at the PYRONOVA s. r. o. facility in Trnava, Slovakia, as laid down in the conclusion of this section, which represents a special type of personal data processing by this individual company.

The information below also includes details **on the storage periods for personal data**. Such periods represent **maximal periods** during which we may process your personal data for the defined purposes. In reality, however, we proceed to the liquidation or pseudonymization of personal data before the expiry of these periods if we consider the personal data to be unnecessary in terms of the intended purposes of processing.

Given the seriousness with which the company treats the protection of your personal data, we'd like to assure you that your personal data will not be disclosed to any entities if unnecessary or without reason.

Please note, that the processing of your personal data may be based on several of the legal bases specified below. The termination of any one such legal basis (e.g. your consent to personal data processing) may not result in us terminating the processing of your personal data if processed based on another legal basis that endures.

For more information, please contact the relevant PYRONOVA group company using the contact details provided above.

Client / former client at the time the GDPR took effect

If you are a client to whom a PYRONOVA group company provides services, it processes your personal data in the scope necessary for any or all of the following purposes depending on the status of your contractual relationship (1) to prepare, negotiate, conclude, amend and maintain records of the contractual relationship with you, (2) for the purposes of performing the contractual relationship concluded with you, (3) to archive all documents including communication related to the contractual relationship concluded with you in the interests of protecting the company's rights and enforcing its claims and in the interests of fulfillment of statutory obligations concerning records management, or (4) to fulfill the company's statutory obligations under local legislation concerning accounting.

If you were a client of a PYRONOVA group company provided services at the time the GDPR took effect but are no longer a client, your personal data is processed in the scope necessary (1) to archive all documents, including communications, related to the contractual relationship concluded with you in the interests of protecting the company's rights and enforcing its claims and in the interests of fulfillment of statutory obligations concerning records management.

Legal basis for processing your personal data: performance of the contract by the company that is a party thereto, including any pre-contractual relationship with you (Article 6 (1)(b) GDPR), fulfillment of the company's statutory obligations under local legislation (Article 6 (1)(c) GDPR) and the

company's legitimate interests that require the processing of your personal data (Article 6 (1)(f) GDPR).

Legitimate interests: protection of the company's rights and enforcement of its claims.

Categories of potential recipients of your personal data: Tax offices, state and public authorities and bodies, suppliers of standard software or technical support, web hosting or cloud service providers, the providers of professional services (legal advisers, accountants, tax advisers, auditors), banks, postal carriers, couriers, other vendors.

Personal data storage period (maximal): Personal data in the documentation classified under such category is stored for a period of 10 years, except where a longer storage period is required for other reasons.

Person acting on behalf of a client / Person who acted on behalf of a client

If you are a person acting on behalf of a client or a person who acted on behalf of a client (such as its employee, member of a body, subcontractor or other person), a PYRONOVA group company processes your personal data in the scope necessary for any or all of the following purposes depending on the status of your contractual relationship with the client (1) to prepare, negotiate, conclude, amend and maintain records of the contractual relationship with the client, (2) for the purposes of performing the contractual relationship concluded with the client, (3) to archive all documents including communication related to the contractual relationship concluded with the client in the interests of protecting the company's rights and enforcing its claims and in the interests of fulfillment of statutory obligations concerning records management, and (4) to fulfill the company's statutory obligations under local legislation concerning accounting.

Legal basis for processing your personal data: fulfillment of the company's statutory obligations under local legislation (Article 6 (1)(c) GDPR) and the company's legitimate interests that require the processing of your personal data (Article 6 (1)(f) GDPR).

Legitimate interests: conclusion and fulfillment of the contractual relationship with the client / protection of the company's rights and enforcement of its claims.

Categories of potential recipients of your personal data: Client, tax offices, state and public authorities and bodies, suppliers of standard software or technical support, web hosting or cloud service providers, the providers of professional services (legal advisers, accountants, tax advisers, auditors), banks, postal carriers, couriers, other vendors.

Personal data storage period (maximal): Personal data in the documentation classified under such category is stored for a period of 10 years, except where a longer storage period is required for other reasons.

Vendor / former vendor at the time the GDPR took effect

If you are a vendor to a PYRONOVA group company providing goods or services, such company processes your personal data in the scope necessary for any or all of the following purposes depending on the status of your contractual relationship (1) to prepare, negotiate, conclude, amend

and maintain records of the contractual relationship with you, (2) for the purposes of performing the contractual relationship concluded with you, (3) to archive all documents including communication related to the contractual relationship concluded with you in the interests of protecting the company's rights and enforcing its claims and in the interests of fulfillment of statutory obligations concerning records management, (4) to fulfill the company's statutory obligations under local legislation concerning accounting, and (5) to fulfill the company's statutory obligations in accordance with local legislation concerning occupational health and safety and illegal employment within audits to determine legal compliance therewith at project sites.

If you were a vendor to a PYRONOVA group company to which you provided goods or services at the time the GDPR took effect but are no longer a vendor, your personal data is processed in the scope necessary (1) to archive all documents, including communications, related to the contractual relationship concluded with you in the interests of protecting the company's rights and enforcing its claims and in the interests of fulfillment of statutory obligations concerning records management.

Legal basis for processing your personal data: performance of the contract by the company that is a party thereto, including any pre-contractual relationship with you (Article 6 (1)(b) GDPR), fulfillment of the company's statutory obligations under local legislation (Article 6 (1)(c) GDPR) and the company's legitimate interests that require the processing of your personal data (Article 6 (1)(f) GDPR).

Legitimate interests: protection of the company's rights and enforcement of its claims.

Categories of potential recipients of your personal data: Tax offices, state and public authorities and bodies, suppliers of standard software or technical support, web hosting or cloud service providers, the providers of professional services (legal advisers, accountants, tax advisers, auditors), banks, postal carriers, couriers, clients.

Personal data storage period (maximal): Personal data in the documentation classified under such category is stored for a period of 10 years, except where a longer storage period is required for other reasons.

Person acting on behalf of a vendor / Person who acted on behalf of a vendor

If you are a person acting on behalf of a vendor or a person who acted on behalf of a vendor (such as its employee, member of a body, subcontractor or other person), a PYRONOVA group company processes your personal data in the scope necessary for any or all of the following purposes depending on the status of your contractual relationship with the vendor (1) to prepare, negotiate, conclude, amend and maintain records of the contractual relationship with the vendor, (2) for the purposes of performing the contractual relationship concluded with the vendor, (3) to archive all documents including communication related to the contractual relationship concluded with the vendor in the interests of protecting the company's rights and enforcing its claims and in the interests of fulfillment of statutory obligations concerning records management, (4) to fulfill the company's statutory obligations under local legislation concerning accounting, and (5) to fulfill the company's statutory obligations in accordance with local legislation concerning occupational health and safety and illegal employment within audits to determine legal compliance therewith at project sites.

Legal basis for processing your personal data: fulfillment of the company's statutory obligations under local legislation (Article 6 (1)(c) GDPR) and the company's legitimate interests that require the processing of your personal data (Article 6 (1)(f) GDPR).

Legitimate interests: conclusion and fulfillment of the contractual relationship with the vendor / protection of the company's rights and enforcement of its claims.

Categories of potential recipients of your personal data: Vendor, tax offices, state and public authorities and bodies, suppliers of standard software or technical support, web hosting or cloud service providers, the providers of professional services (legal advisers, accountants, tax advisers, auditors), banks, postal carriers, couriers, clients.

Personal data storage period (maximal): Personal data in the documentation classified under such category is stored for a period of 10 years, except where a longer storage period is required for other reasons.

Job candidate

If you are a candidate applying for a position with a PYRONOVA group company, your personal data is processed for the purposes of assessing your suitability for performing the defined position and for the purposes of invitation to an interview for the position in question.

If you are not hired by this PYRONOVA group company for the specified position, but the company would like to contact you in the future regarding other open positions, your personal data will be processed by this company to keep records of qualified potential job candidates.

Legal basis for processing your personal data: your free and unambiguous consent to the processing of personal data (Article 6 (1)(a) GDPR). If you are a candidate and the company received data from another natural person (e.g. your acquaintance, family member or friend), the legal basis for the processing of your personal data is also your written consent to the processing of personal data (Article 6 (1)(a) GDPR). In such case, we will not accept or further process your personal data provided by such third party without your consent.

Categories of potential recipients of your personal data: None.

Personal data storage period (maximal): Personal data is stored for the period you have provided consent to personal data processing as a job candidate or for a shorter period until such consent is revoked.

Former employee at the time the GDPR took effect

If you are a former employee of a PYRONOVA group company, your personal data is only processed for the purposes of archiving in the interests of protecting the company's rights and enforcing its claims and in the interests of fulfillment of statutory obligations concerning records management.

Legal basis for processing your personal data: fulfillment of the company's statutory obligations under local legislation (Article 6 (1)(c) GDPR) and the company's legitimate interests that require the processing of your personal data (Article 6 (1)(f) GDPR).

Legitimate interests: protection of the company's rights and enforcement of its claims.

Categories of potential recipients of your personal data: State and public authorities and bodies, suppliers of standard software or technical support, web hosting or cloud service providers, couriers, postal carriers.

Personal data storage period (maximal): Personal data in personnel files is stored for a period of 70 years from the date of birth. Personal data on payroll documents is stored for a period of 50 years. Personal data on attendance and holiday records is stored for a period of 3 years. Personal data in other documents is stored for a period of 3 to 10 years, unless a longer term of storage is required for other reasons.

Spouses, dependent children, parents of dependent children and other immediate family members of employees / spouses of former employees at the time the GDPR took effect, dependent children of former employees at the time the GDPR took effect, parents of the dependent children of former employees at the time the GDPR took effect and other immediate family members of former employees at the time the GDPR took effect

If you are a spouse, dependent child, parent of a dependent child or other immediate family member of an employee of a PYRONOVA group company, your personal data is processed for the purposes of the HR and payroll agenda in relation to this employee and subsequent archiving in accordance with local legislation.

If you are a spouse, dependent child, parent of a dependent child or other immediate family member of a former employee of a PYRONOVA group company, your personal data was processed for the purposes of the HR and payroll agenda in relation to this employee and the data is archived in accordance with local legislation.

Legal basis for processing your personal data: fulfillment of the company's statutory obligations under local legislation (Article 6 (1)(c) GDPR).

Categories of potential recipients of your personal data: Health insurers, social insurance, tax offices, supplemental pension savings institutions, pension management companies, Office of Labor, Social Affairs and Family, state and public authorities and bodies, suppliers of standard software or technical support, web hosting or cloud service providers, couriers, postal carriers, banks.

Personal data storage period (maximal): Personal data is stored for 3 to 10 years.

Partner / former partner at the time the GDPR took effect

If you are a partner in a PYRONOVA group company, your personal data is processed (1) to register you in the list of partners managed by the company and changes thereto, (2) to register and make changes to the registration of your personal data in public registers and erasure there from, (3) to complete, use and store corporate documents and related documents and communication, whereby such storage is performed in the interests of protecting the company's rights and enforcing its claims and in the interests of fulfillment of statutory obligations concerning records management, (4) to

fulfill the company's rights and obligations in relation to you as a partner, and (5) to fulfill the company's statutory obligations under local legislation concerning accounting.

If you were a partner in a PYRONOVA group company at the time the GDPR took effect but are no longer, your personal data is processed in the scope necessary (1) to use and store all corporate documents and related documents and communication, whereby such storage is performed in the interests of protecting the company's rights and enforcing its claims and in the interests of fulfillment of statutory obligations concerning records management.

Legal basis for processing your personal data: fulfillment of duties on the part of the company in which you were a partner (Article 6 (1)(b) GDPR), fulfillment of the company's statutory obligations under local legislation (Article 6 (1)(c) GDPR) and the company's legitimate interests that require the processing of your personal data (Article 6 (1)(f) GDPR).

Legitimate interests: protection of the company's rights and enforcement of its claims.

Categories of potential recipients of your personal data: Trade licensing authority, the Commercial Register, state and public authorities and bodies, suppliers of standard software or technical support, web hosting or cloud service providers, the providers of professional services (legal advisers, accountants, tax advisers, auditors), banks, postal carriers, couriers.

Personal data storage period (maximal): Personal data in minutes from the meetings of the company's partners, in other corporate documents and related documents and communication is stored for a period of 5 years from the dissolution of the company. Personal data in the documents in the accounting agenda is stored for a period of 10 years, except where a longer storage period is required for other reasons. Personal data in the list of partners maintained by the company is stored for the duration of the period in which you remain a partner in the company. Personal data in other documents is stored for a period of 10 years from the termination of the partner's relationship with the company.

Statutory body / former statutory body at the time the GDPR took effect

If you are the statutory body of a PYRONOVA group company, your personal data is processed (1) to prepare, negotiate, conclude, amend and maintain records of the contractual relationship with you, (2) for the purposes of performing the contractual relationship concluded with you, (3) to register and make changes to the registration of your personal data in public registers and erasure there from, (4) to complete, use and store corporate documents and related documents and communication, whereby such storage is performed in the interests of protecting the company's rights and enforcing its claims and in the interests of fulfillment of statutory obligations concerning records management, and (5) to fulfill the company's statutory obligations under local legislation concerning accounting.

If you were a statutory body in a PYRONOVA group company at the time the GDPR took effect but are no longer, your personal data is processed in the scope necessary (1) to use and store all corporate documents and other documents and communication, whereby such storage is performed in the interests of protecting the company's rights and enforcing its claims and in the interests of fulfillment of statutory obligations concerning records management.

Legal basis for processing your personal data: performance of the contract by the company that is a party thereto, including any pre-contractual relationship with you (Article 6 (1)(b) GDPR), fulfillment of the company's statutory obligations under local legislation (Article 6 (1)(c) GDPR) and the company's legitimate interests that require the processing of your personal data (Article 6 (1)(f) GDPR).

Legitimate interests: protection of the company's rights and enforcement of its claims.

Categories of potential recipients of your personal data: Trade licensing authority, the Commercial Register, state and public authorities and bodies, suppliers of standard software or technical support, web hosting or cloud service providers, the providers of professional services (legal advisers, accountants, tax advisers, auditors), banks, postal carriers, couriers.

Personal data storage period (maximal): Personal data documents concerning authorization to conduct specific business or other activities, in minutes from the meetings of the company's statutory body, in other corporate documents and related documents and communication is stored for a period of 5 years from the dissolution of the company. Personal data in the documents in the accounting agenda is stored for a period of 10 years, except where a longer storage period is required for other reasons. Personal data in other documents (e.g. agreements) is stored for a period of 10 years from the termination of the statutory body's relationship with the company.

Debtor / former debtor at the time the GDPR took effect

If you are a debtor to a PYRONOVA group company, your personal data is processed for the out-of-court collection of its receivable, including subsequent archiving of documentation in the interests of protecting the company's rights and enforcing its.

If you were a debtor to a PYRONOVA group company at the time the GDPR took effect but are not now, your personal data is processed for the purposes of archiving documentation in the interests of protecting the company's rights and enforcing its claims.

Legal basis for processing your personal data: the company's legitimate interests that require the processing of your personal data (Article 6 (1)(f) GDPR) and the company's legitimate interests that require the processing of your personal data (Article 6 (1)(f) GDPR).

Legitimate interests: protection of the company's rights and enforcement of its claims.

Categories of potential recipients: Suppliers of standard software or technical support, web hosting or cloud service providers, legal advisers, banks, postal carriers, couriers.

Personal data storage period (maximal): Personal data is stored for a period of 10 years from the end of the collection process.

Person acting on behalf of a debtor / Person who acted on behalf of a former debtor

If you are a person acting on behalf of our debtor (such as its employee, member of a body, subcontractor or other person), your personal data is processed by a PYRONOVA group company for

the out-of-court collection of its receivable, including subsequent archiving of documentation in the interests of protecting the company's rights and enforcing its claims.

If you are a person who acted on behalf of our debtor (such as its employee, member of a body, subcontractor or other person), your personal data is processed by a PYRONOVA group company for the out-of-court collection of its receivable, and if collected, for the subsequent archiving of documentation in the interests of protecting the company's rights and enforcing its claims.

Legal basis for processing your personal data: fulfillment of the company's statutory obligations under local legislation (Article 6 (1)(c) GDPR) and the company's legitimate interests that require the processing of your personal data (Article 6 (1)(f) GDPR).

Legitimate interests: protection of the company's rights and enforcement of its claims.

Categories of potential recipients of personal data: Suppliers of standard software or technical support, web hosting or cloud service providers, legal advisers, banks, postal carriers, couriers.

Personal data storage period (maximal): Personal data is stored for a period of 10 years from the end of the collection process.

Party to a proceeding / former party to a proceeding at the time the GDPR took effect

If you are a party to any court or other proceeding in any legal standing conducted against a PYRONOVA group company, or, conversely, a PYRONOVA group company is engaged in or initiates such proceeding against you and/or another party to the proceeding, your personal data is processed for the purposes of conducting such proceeding and subsequent archiving of documentation in the interests of protecting the company's rights and enforcing its claims.

If you were a party to any court or other proceeding in any legal standing conducted against a PYRONOVA group company, or, conversely, a PYRONOVA group company was engaged in or initiated such proceeding against you and/or another party to the proceeding but were no longer involved at the time the GDPR took effect, your personal data is processed for the purposes of conducting such proceeding and subsequent archiving of documentation in the interests of protecting the company's rights and enforcing its claims.

Legal basis for processing your personal data: fulfillment of the company's statutory obligations under local legislation (Article 6 (1)(c) GDPR) and the company's legitimate interests that require the processing of your personal data (Article 6 (1)(f) GDPR).

Legitimate interests: protection of the company's rights and enforcement of its claims.

Categories of potential recipients of personal data: Courts, arbitration courts, executors, law enforcement engaged in criminal and offense-related procedures, state and public authorities and bodies, parties to proceedings, including witnesses, experts, interpreters and others, suppliers of standard software or technical support, web hosting or cloud service providers, the providers of professional services (legal advisers, accountants, tax advisers, auditors), banks, postal carriers, couriers.

Personal data storage period (maximal): Personal data is stored for a period of 10 years from the end of the proceeding.

Mail recipients and senders /Former mail recipients and senders at the time the GDPR took effect

If you are the recipient of any correspondence sent by a PYRONOVA group company or a sender from whom correspondence is received, either in paper or electronic form via an electronic mailbox, the company processes your personal data for the purposes of mailing records in accordance with local legislation.

If you are the recipient of a Christmas/New Year's card from a PYRONOVA group company, the company processes your personal data in the interests of the company's legitimate interests.

Legal basis for processing your personal data: fulfillment of the company's statutory obligations under local legislation (Article 6 (1)(c) GDPR) and the company's legitimate interests that require the processing of your personal data (Article 6 (1)(f) GDPR).

Legitimate interests: maintaining good relations in business circles and building the company's name and reputation

Categories of potential recipients of personal data: State and public authorities and bodies, suppliers of standard software or technical support, web hosting or cloud service providers, couriers, postal carriers.

Personal data storage period (maximal): Personal data is stored for a period of 10 years in mailing records. If the company's legitimate interests endure after the relationship to the recipient (which may terminate upon complete interruption of collaboration or after an extended period of time).

Person acting on behalf of mail recipients and senders /Person acting on behalf of former mail recipients and senders

If you are a person acting on behalf of the recipient of any correspondence sent by a PYRONOVA group company or a person acting or who acted on behalf of a sender from whom correspondence is received or was received, either in paper or electronic form via an electronic mailbox (such as its employee, member of a body, subcontractor or other person), the company processes your personal data for the purposes of mailing records in accordance with local legislation.

If you received of a Christmas/New Year's card from a PYRONOVA group company, the company processes your personal data in the interests of the company's legitimate interests.

Legal basis for processing your personal data: fulfillment of the company's statutory obligations under local legislation (Article 6 (1)(c) GDPR) and the company's legitimate interests that require the processing of your personal data (Article 6 (1)(f) GDPR).

Legitimate interests: maintaining good relations in business circles and building the company's name and reputation

Categories of potential recipients of personal data: State and public authorities and bodies, suppliers of standard software or technical support, web hosting or cloud service providers, couriers, postal carriers.

Personal data storage period (maximal): Personal data is stored for a period of 10 years in mailing records. If the company's legitimate interests endure after the relationship to the recipient (which may terminate upon complete interruption of collaboration or after an extended period of time).

Data subject

If you are a data subject exercising your rights under the GDPR against a PYRONOVA group company your personal data is processed for the purposes of complying with such request(s).

Legal basis for processing your personal data: fulfillment of the company's statutory obligations under EU legislation and local legislation (Article 6 (1)(c) GDPR).

Categories of potential recipients of personal data: State and public authorities and bodies, suppliers of standard software or technical support, web hosting or cloud service providers, couriers, postal carriers.

Personal data storage period (maximal): Personal data is stored for a period of 1 year from completion of the request.

Participant in a social event

If you are invited or register to attend a social event organized by a PYRONOVA group company to whom you provided your personal data, such data is processed for the purposes of organizing the event and ensuring your participation in the organized social event. Photos may be taken at social events for marketing and promotional purposes of the given PYRONOVA group company and your presence in the clearly designated area for the photographer represents your consent to the processing of such personal data. Please stay out of the designated area if you do not consent to such processing. You have the right to object to having your personal picture taken at any time. Your photos may be published on the company's social network profile with your consent.

Legal basis for processing your personal data: your free and unambiguous consent to the processing of personal data (Article 6 (1)(a) GDPR). Consent may be provided in writing or through affirming action taken in the form of being photographed voluntarily. In terms of inviting and ensuring your participation in a social event, the legal basis being followed is in the legitimate interest of the company (Article 6 (1)(f) GDPR).

Legitimate interests: maintaining good relations in business circles and building the company's name and reputation

Categories of potential recipients of personal data: Companies providing photography services, social network operators, registered users of social networks.

Personal data storage period (maximal): If the company's legitimate interests endure after the relationship to you (which may terminate upon complete interruption of collaboration or after an

extended period of time). If you consent, your personal data will be stored for the period for which you granted consent, and until consent is revoked unless no such period is defined.

Users of social networks

The PYRONOVA group and PYRONOVA group companies have established profiles on social networks (Facebook, Instagram, YouTube, LinkedIn and others), which results in the processing of the personal data of registered users and which are used by our professionally administered profiles. This processing is subject to separate conditions for the protection of your privacy, which are transparently published within our social network profiles.

Legal basis for processing your personal data: your free and unambiguous consent to the processing of personal data (Article 6 (1)(a) GDPR) - confirmed through unambiguous action or interaction via our profile (for instance, using the “Like” or “Share” features, etc.) or other affirming action taken in connection with the use of our social network profile (for instance, by commenting on posts).

Categories of potential recipients of personal data: Social network operators, registered users of social networks.

Personal data storage period (maximal): Until you revoke your consent, except if personal data processing is terminated earlier.

Party seeking sponsorship

If you are a party seeking sponsorship, your personal data shall be processed by a PYRONOVA group company (1) to evaluate your request for sponsorship and (2) to conclude a potential sponsorship agreement, (3) its performance, (4) to archive of all documents, including communication, related to the agreement concluded with you in the interests of protecting the company’s rights and enforcing its claims and in the interests of fulfillment of statutory obligations concerning records management, and (5) to fulfill the company’s statutory obligations under local legislation concerning accounting.

Legal basis for processing your personal data: performance of the contract by the company that is a party thereto, including any pre-contractual relationship with you (Article 6 (1)(b) GDPR), fulfillment of the company’s statutory obligations under local legislation (Article 6 (1)(c) GDPR) and the company’s legitimate interests that require the processing of your personal data (Article 6 (1)(f) GDPR).

Legitimate interests: protection of the company’s rights and enforcement of its claims.

Categories of potential recipients of personal data: Tax offices, state and public authorities and bodies, suppliers of standard software or technical support, web hosting or cloud service providers, the providers of professional services (legal advisers, accountants, tax advisers, auditors), banks, postal carriers, couriers, other vendors.

Personal data storage period (maximal): Personal data in the documentation classified under this purpose is stored for a period of 10 years, except where a longer storage period is required for other reasons.

Person representing a party seeking sponsorship / Person who represented a party seeking sponsorship

If you are a person representing a party seeking sponsorship or who represented such party (such as its employee, member of a body) your personal data may be processed by a PYRONOVA group company for any of the following reasons: (1) to evaluate your request for sponsorship and (2) to conclude a potential sponsorship agreement, (3) its performance, (4) to archive all documents, including communication, related to the agreement concluded with you in the interests of protecting the company's rights and enforcing its claims and in the interests of fulfillment of statutory obligations concerning records management, and (5) to fulfill the company's statutory obligations under local legislation concerning accounting.

Legal basis for processing your personal data: fulfillment of the company's statutory obligations under local legislation (Article 6 (1)(c) GDPR) and the company's legitimate interests that require the processing of your personal data (Article 6 (1)(f) GDPR).

Legitimate interests: conclusion and fulfillment of the contractual relationship with the party seeking sponsorship / protection of the company's rights and enforcement of its claims.

Categories of potential recipients of your personal data: Tax offices, state and public authorities and bodies, suppliers of standard software or technical support, web hosting or cloud service providers, the providers of professional services (legal advisers, accountants, tax advisers, auditors), banks, postal carriers, couriers, other vendors.

Personal data storage period (maximal): Personal data in the documentation classified under this purpose is stored for a period of 10 years, except where a longer storage period is required for other reasons.

Other persons who contact us

If you do not fall under any of the above categories and you contact us using your personal data, we will process this personal data for the purposes of resolving your request and contacting you back.

Legal basis for processing your personal data: your free and unambiguous consent to the processing of personal data (Article 6 (1)(a) GDPR) as expressed by an affirming action (by making contact).

Categories of potential recipients of personal data: State and public authorities and bodies, suppliers of standard software or technical support, web hosting or cloud service providers, couriers, postal carriers, other vendors.

Personal data storage period (maximal): For the period necessary to resolve your request, or until such time that you revoke your consent.

Visiting the PYRONOVA s.r.o. facility in Trnava, Slovakia

If you visit our PYRONOVA s.r.o. facility located at Ivana Krasku 31, Trnava, Slovakia, your personal data will be processed by the CCTV system installed to protect the property of this PYRONOVA s.r.o.

company and the property of others, for health protection reasons and to protect public order, safety and to prevent crimes or offenses from being committed and their detection.

Legal basis for processing your personal data: the company's legitimate interests that require the processing of your personal data (Article 6 (1)(f) GDPR).

Legitimate interests: protection of company property / outside property / protection of health / protection of public order, safety and to prevent crimes or offenses from being committed and their detection.

Categories of potential recipients of your personal data: Law enforcement entities, Courts, Legal counsel.

Personal data storage period (maximal): CCTV recordings are kept for a period of 15 days after recording. An exception exists if a law enforcement entity authorized to investigate a crime or offense gives an order to preserve the recording from the CCTV system to prevent its erasure at it would otherwise jeopardize on-going proceedings.

7. Are you obliged to provide your personal data?

If the legal basis for processing your personal data is to allow a PYRONOVA group company to fulfill its statutory obligations and you refuse to provide your personal data, such refusal may result in damages that the company may then seek to apply against you (such as if a fine is levied in direct connection with such failure to comply). In such case, the provisioning of your personal data is a statutory requirement and you must provide this data. In other cases, the failure to provide your personal data as required by law may result in a potential contract or agreement not being concluded, while the provisioning of personal data is voluntary in this instance.

If the legal basis for processing your personal data is the conclusion or performance of a contractual relationship with a PYRONOVA group company and you refuse to provide your personal data, you will not be permitted to enter into the contractual relationship with the PYRONOVA group company. The provisioning of your personal data is voluntary.

If a legitimate interest of a PYRONOVA group company is legal basis for processing your personal data in accordance with Article 6 (1)(f) GDPR, you must allow such processing, but you still have the right to object.

If your consent to personal data processing is the legal basis for the processing of your personal data and you refuse to provide such consent to a PYRONOVA group company, it will be impossible to process your personal data for the specified purpose or to act accordingly (for instance, if you are a candidate for a position at a PYRONOVA group company and you do not provide consent to personal data processing, we will be unable to review your qualifications and invite you for an interview). The provisioning of your personal data is voluntary.

8. How can you revoke consent if processing of your personal data is based on such consent?

If the processing of your personal data is based on consent provided to a PYRONOVA group company, you may **revoke this consent** at any time by delivering notification to the company using its contact

details provided above. The contents of such notification shall include revocation of consent provided previously.

Revocation of consent to process personal data has no prejudice towards the lawfulness of personal data processed before such revocation.

Revocation of consent to process your personal data does not result in the termination of the processing of your personal data by a PYRONOVA group company on another legal basis than the one referred to in the notification.

9. What other rights do you have with respect to personal data?

First of all, you have the right to clear, transparent and understandable information about how we use your personal data and what rights you have.

You have the following rights:

- **Right to access personal data** - you have the right to receive a copy of the personal data that a PYRONOVA group company concerning you and information as to how it uses your personal data. In most cases, we will provide you with a transcript of your personal data in written form, unless you request such data be provided in another form. If you request this information using electronic means, they will be provided to you electronically if technologically feasible.
- **Right to rectification of personal data** - we will take the necessary measures to ensure the accuracy, completeness and currentness of your personal data possessed by a PYRONOVA group company. If you believe that your personal data is inaccurate, incomplete or out-of-date, please do not hesitate to contact a PYRONOVA group company to request rectification of this data.
- **Right to erasure (right to be forgotten)** - you have the right to request that a PYRONOVA group company erase your personal data, for instance, personal data that it obtained from your previously but is no longer necessary to fulfill the original purpose of processing. Your right must be compared to all relevant circumstances. For instance, the company may have specific legal and regulatory obligations or eligible interests, which means they are unable to comply with such request.
- **Right to restrict personal data processing** - under certain circumstances, you are eligible to request that a PYRONOVA group company stop using your personal data. Such circumstances may include if you think the personal data they have about you is potentially inaccurate or if you believe they no longer need to use your personal data.
- **Right to data portability** - under certain circumstances, you have the right to request that a PYRONOVA group company transfer the personal data you provided to a third party of your choosing. The right to such transfer only involves the personal data obtained from you based on your consent or an agreement in which you are one of the parties thereto.

- **Right to object** - you have a right to object to the processing of your personal data based on the legitimate interests of a PYRONOVA group company. If you are convinced that the company does not have a convincing and legitimate reason for such processing and you object to such processing, your personal data will no longer be processed.
- **Right to petition to begin personal data protection proceedings** - if you believe that a PYRONOVA group company is unjustly or unlawfully processing your personal data, you have the right to file a complaint with the competent personal data protection authority in the member state of the European Economic Area (EEA) in which you live or work, or in which a breach of legislation concerning personal data protection is alleged to have occurred.
- **Right to reject automated individual decision-making and profiling** – you have the right to be exempt from decision-making that exclusively employs automated means of processing, including profiling, and with legal effects that involve you or otherwise significantly influence you.

These rights are specified in more detail in Articles 15 to 22 GDPR. Please contact us at any time to learn more about your rights. The GDPR lays down general conditions for the exercise of your individual rights. The existence of such rights does not automatically mean that the PYRONOVA group company will automatically comply once applied, as certain exceptions may be used in specific instances and certain rights are connected to specific conditions that may not be met in all cases. The PYRONOVA group company will examine every such request made with regards to a specific right and examine the legal aspects and applicability of any exceptions thereto.

You may exercise any one of your rights at any time with respect to a PYRONOVA group company using the contact details provided above. Internal PYRONOVA group guidelines lay down the procedure for handling such notifications.

10. Where do we transmit your personal data?

We have no intention of transmitting your personal data across borders and to countries outside the European Economic Area (which includes the EU, Iceland, Norway and Lichtenstein).

11. How do we process your personal data?

We process your personal data in electronic form on servers, in databases on PCs or in other devices, or in paper form.

None of the companies in the PYRONOVA group performs any processing operations that would result in decisions being made with legal effect or other significant impacts on your person based on any automated processing of your personal data. Likewise, the companies in the PYRONOVA group do not use profiling when processing personal data.

12. How do we secure the protection of your personal data?

The security of your personal data is our top priority. To secure the protection of your personal data, we have adopted **the necessary technical and organizational measures**.

13. Not satisfied?

if you are not satisfied with the manner in which the PYRONOVA group processes your personal data, please feel free to contact it using any of the contact details specified above herein.

14. When do these principles enter into effect and how may they change?

These General Principles of Personal Data Protection for the PYRONOVA group enter into force on **25 May 2018**. We reserve the right to modify these principles if there is any change in the processing of personal data. You will be informed of any changes hereto via our website at www.pyronova.com.