

INFORMATION FOR THE DATA SUBJECT

within the meaning of Article 12 of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27th, 2016 on the protection of natural persons with regard to personal data processing and on the free movement of such data (hereinafter referred to as the '*GDPR*')

provided to the data subject by the Controller: **Royal Water s.r.o.**, with its registered office at: Palatínova 2732/61, Komárno 945 01, Slovak Republic, company ID: 50913131 (hereinafter referred to as the '*controller*')

Pursuant to Article 12(1) of GDPR, the Controller, i.e. the entity of processing the data subject's personal data for specific purposes, shall be responsible for taking appropriate measures to provide the data subject with all the information referred to in Articles 13 and 14 of GDPR and all notifications under Articles 15 to 22 and 34 of GDPR relating to the processing of their personal data, in a concise, transparent, comprehensible and easily accessible form, formed in a clear and simple manner, particularly in the case of information specifically intended for a child, in writing or by other means, including by electronic means where necessary.

In view of the above, the Controller shall provide the data subject with the following information:

Under GDPR, the data subject is a person whose personal data is being processed (such as members of the Controller, persons participating in the Controller's organised events, their employees, etc.). GDPR defines a set of data subject's rights that guarantee the protection of processed personal data and the controller shall allow for the practical implementation of such rights to the data subject and cooperate in their execution.

These rights include:

- **the right to information and access to personal data**, which means that the data subject must always be provided with a range of information and data when obtaining personal data and must also be given the opportunity to access personal data on the basis of specified conditions;
- the data subject shall have **the right to obtain from the controller confirmation** that his or her personal data are being processed and related information;
- **the right to rectification and erasure**, which means that the data subject shall have the right to request the rectification of incorrectly entered personal data and the addition of incomplete data, as well as **the right to erasure ('right to be forgotten')** under which the data subject may require the erasure of personal data concerning him or her when meeting the specified conditions (e.g., the processing purpose has ceased, the processing consent is revoked);
- the data subject shall have **the right, under specified conditions, to request a restricting their personal data processing**;
- in respect of the rectification, erasing and restricting personal data processing, the data subject shall have **the right to have any recipient notified who has been provided with such data**;
- the data subject shall have **the right to personal data transferability**, consisting in that, where possible on the Controller's part, the data must be provided in a way allowing them to be transferred to another controller (in a structured, commonly used and machine-readable format); if technically feasible, the data subject shall have the right to have such transfer carried out by the controller;

- the data subject shall have **the right to object to personal data processing** at any time in cases regulated by Article 6(1)(e) or (f) of GDPR (i.e., in the case of personal data processing for public interest and public service tasks and for the purposes of the legitimate interests pursued by the Controller or a third party);
- the data subject shall have **the right to object to automated individual decision-making, including profiling (provided such a decision is made)** consisting in the data subject's affairs being decided automatically on the basis of the personal data provided without human intervention;
- the data subject shall have **the right to object to processing data for direct marketing purposes**;
- the data subject shall have **the right to be clearly and simply informed by the Controller in the event of a personal data breach leading to a high risk to their rights, without undue delay.**

Given that the above definition is only a brief definition of the data subject's rights, below is the scope of the data subject's rights in full specified by GDPR under Articles 15 to 22 and 34 of GDPR.

Information and access to personal data

I. Information to be provided where personal data are collected from the data subject

1. Where personal data concerning the data subject are collected from the data subject, the controller shall provide the data subject with all of the following information when personal data are obtained:

- a) the identity, contact details;
- b) the contact details of the data protection officer, where applicable;
- c) purposes where personal data is intended and the legal basis for the processing;
- d) where processing is based on Article 6(1)(f) of GDPR, the legitimate interests pursued by the controller or by a third party;
- e) personal data recipients or categories of recipients, if any;
- f) where applicable, information that the Controller intends to transfer personal data to a third country or international organisation and the existence or absence of an adequacy decision by the Commission, or in the case of transfers referred to in Articles 46 or 47 or the second subparagraph of Article 49(1) of GDPR, reference to suitable or appropriate guarantees and the means to obtain a copy thereof or where they have been made available.

2. In addition to the information referred to in paragraph 1, when obtaining personal data, the Controller shall provide the data subject with the following additional information necessary to ensure fair and transparent processing:

- a) the period for which the personal data will be stored, or if that is not possible, the criteria for determining that period;

- b) the existence of the right to request access to the personal data from the Controller relating to the data subject and the right to rectify or erase them or restrict their processing, or the right to object to processing as well as the right to data portability;
 - c) where processing is based on Article 6(1)(a) of GDPR or Article 9(2)(a) of GDPR, the existence of the right to withdraw consent at any time, without prejudice to the lawfulness of processing based on consent granted before its withdrawal;
 - d) the right to lodge a complaint with a supervisory authority;
 - e) whether the provision of personal data is a legal or contractual requirement, or a requirement necessary for the concluding an agreement, whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data;
 - f) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of GDPR and, at least in those cases, meaningful information on the used procedure, as well as the significance and the foreseeable consequences of such processing for the data subject.
3. Where the Controller intends to further process personal data for a purpose other than that for which they were obtained, the Controller shall provide the data subject with information on that other purpose and other relevant information referred to in paragraph 2 prior to such further processing.
4. Paragraphs 1, 2 and 3 shall not apply where and insofar as the data subject already has the information.

II. Information to be provided where personal data has not been obtained from the data subject

1. Where information has not been obtained directly from the data subject, the Controller shall provide the data subject with the following information:
- a) the Controller's identity and the contact details and, where applicable, the Controller's representative;
 - b) the contact details of any data protection officer;
 - c) the purposes for which the personal data is intended and the legal basis for the processing;
 - d) the categories of personal data concerned;
 - e) the recipients or categories of recipients of the personal data, if any;
 - f) where applicable, information that the Controller intends to transfer personal data to a recipient in a third country or international organisation and the existence or absence of an adequacy decision by the Commission, or in the case of transfers referred to in Articles 46 or 47 or the second subparagraph of Article 49(1) of GDPR, reference to suitable or appropriate guarantees and the means to obtain a copy thereof or where they have been made available.
2. In addition to the information referred to in paragraph 1, the Controller shall provide the data subject with the following additional information necessary to ensure fair and transparent processing with respect to the data subject:

- a) the period for which the personal data will be stored, or if that is not possible, the criteria for determining that period;
 - b) where processing is based on Article 6(1)(f) of GDPR, the legitimate interests pursued by the controller or by a third party;
 - c) the existence of the right to request access to the personal data from the Controller relating to the data subject and the right to rectify or erase them or restrict their processing, or the right to object to processing as well as the right to data portability;
 - d) where processing is based on Article 6(1)(a) of GDPR or Article 9(2)(a) of GDPR, the existence of the right to withdraw consent at any time, without prejudice to the lawfulness of processing based on consent granted before its withdrawal;
 - e) the right to lodge a complaint with a supervisory authority;
 - f) from which source the personal data originate, and if applicable, whether it came from publicly accessible sources;
 - g) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4), and at least in those cases, meaningful information on the procedure used, as well as the significance and the foreseeable consequences of such processing for the data subject.
3. The controller shall provide the information referred to in paragraphs 1 and 2:
- a) within a reasonable period after obtaining the personal data, but at the latest within one month, having regard to the specific circumstances in which the personal data are processed;
 - b) where personal data is to be used for communication with the data subject, at the latest at the time of the first communication with the data subject; or
 - c) if a disclosure to another recipient is envisaged, at the latest when the personal data are first disclosed.
4. Where the Controller intends to further process personal data for a purpose other than that for which they were obtained, the Controller shall provide the data subject with information on that other purpose and any other relevant information referred to in paragraph 2 prior to such further processing.
5. Paragraphs 1 to 4 shall not apply where and insofar as:
- a) the data subject already has the information
 - b) the provision of such information proves impossible or would involve a disproportionate effort, in particular for processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the conditions and safeguards referred to in Article 89(1) of or in so far as the obligation referred to in paragraph 1 of this Article is likely to render impossible or seriously impair the achievement of the objectives of that processing. In such cases the controller shall take appropriate measures to protect the data subject's rights and freedoms and legitimate interests, including making the information publicly available;

- c) obtaining or disclosure is expressly laid down by Union or Member State law to which the Controller is subject and which provides appropriate measures to protect the data subject's legitimate interests; or
- d) where the personal data must remain confidential subject to an obligation of professional secrecy regulated by Union or Member State law, including a statutory obligation of secrecy.

III. The data subject's right of access

1. The data subject shall have the right to access personal data and to obtain confirmation from the controller as to whether or not personal data concerning them are being processed, and, where that is the case, access to the personal data and the following information:

- a) processing purposes;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipients to whom the personal data have been or will be provided, particularly recipients in third countries or international organisations;
- d) where possible, the expected period for which personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request rectification or erasure of personal data or restriction of personal data processing from the Controller concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of GDPR and, at least in those cases, meaningful information on the procedure used, as well as the significance and the foreseeable consequences of such processing for the data subject.

2. Where personal data is transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate guarantees pursuant to Article 46 relating to the transfer.

3. The Controller shall provide a copy of the personal data being processed. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.

Rectification and erasure

M. Right to rectification

1. The data subject shall have the right to have the personal data concerning him or her rectified without undue delay. For the purposes of processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

V. Right to erasure ('right to be forgotten')

1. The data subject shall have the right to obtain from the Controller the erasure of personal data concerning him or her without undue delay and the Controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- a) the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based, and where there is no other legal ground for the processing;
- c) the data subject objects to processing pursuant to Article 21(1) of GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of GDPR;
- d) the personal data have been processed unlawfully;
- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- f) the personal data have been collected in connection with the offer of information society services addressed to the child under Article 8(1) of GDPR.

2. Where the Controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the Controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers who are processing personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, such personal data.

3. Paragraphs 1 and 2 shall not apply to the extent that processing is necessary:

- a) for exercising the right of freedom of expression and information;
- b) for fulfilling a legal obligation which requires processing by Union or Member State law to which the Controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- c) for reasons of public interest in the area of public health in accordance with Article 9(2)(h) and (i) of GDPR as well as Article 9(3) of GDPR;
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of GDPR in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- e) for the establishment, exercise or defence of legal claims.

V. Right to restrict processing

1. The data subject shall have the right to obtain restrictions in processing from the controller where one of the following applies:
 - a) The data subject contests the accuracy of the personal data for a period enabling the Controller to verify personal data accuracy;
 - b) the processing 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 processing purposes, but they are required by the data subject for the establishment, exercise or defence of legal claims;
 - d) the data subject has objected to the processing pursuant to Article 21(1) of GDPR, pending the verification whether the legitimate grounds of the Controller override those of the data subject.
2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.
3. The data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the Controller before the restriction of processing is lifted.

VI. Notification obligation regarding rectification or erasure of personal data or processing restrictions

1. The Controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 of GDPR to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Controller shall inform the data subject about those recipients if the data subject requests it.

VII. Right to data portability

1. The data subject shall have the right to receive the personal data concerning them, which they have provided to the Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Controller to which the personal data have been provided, where:
 - a) the processing is based on consent pursuant to Article 6(1)(a) of GDPR or Article 9(2)(a) of GDPR or on a contract pursuant to Article 6(1)(b); and
 - b) processing is carried out by automated means.
2. In exercising their right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17 of GDPR. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller.

4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.

Right to object and automated individual decision-making

IX. Right to object

1. The data subject shall have the right to object, on grounds relating to their particular situation, at any time to personal data processing concerning them which is based on Article 6(1)(e) or (f) of GDPR, including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

2. Where personal data is processed for direct marketing purposes, the data subject shall have the right to object at any time to personal data processing concerning them for such marketing, which includes profiling to the extent that it is related to such direct marketing.

3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

4. At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be brought to the data subject's explicit attention and shall be presented clearly and separately from any other information.

5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise their right to object by automated means using technical specifications.

6. Where personal data is processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1) of GDPR, the data subject, on grounds relating to their particular situation, shall have the right to object to personal data processing concerning them, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

X. Automated individual decision-making, including profiling

1. The data subject shall have the right not to be subject to a decision which is based solely on automated processing, including profiling, and which has legal effects concerning them or similarly significantly affects them.

2. Paragraph 1 shall not apply where the decision:

- a) is necessary for entering into, or performance of, an agreement between the data subject and a data controller;
- b) is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- c) is based on the data subject's explicit consent.

3. In the cases referred to in paragraphs 2(a) and (c), the Controller shall implement suitable measures to protect the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the Controller's part, to express their point of view and to contest the decision.

4. Decisions referred to in paragraph 2 shall not be based on special categories of personal data referred to in Article 9(1) of GDPR, unless Article 9(2)(a) or (g) applies and suitable measures to guarantee the data subject's rights and freedoms and legitimate interests are in place.

XI. Communication of a personal data breach to the data subject

1. When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Controller shall communicate the personal data breach to the data subject without undue delay.

2. Communication to the data subject referred to in paragraph 1 of this Article shall describe in clear and plain language the nature of the personal data breach and contain at least the information and measures referred to in Article 33(3)(b), (c) and (d) of GDPR.

3. Communication to the data subject referred to in paragraph 1 shall not be required if any of the following conditions are met:

- a) Controller has implemented appropriate technical and organisational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorised to access it, such as encryption;
- b) the Controller has taken subsequent measures which ensure that the high risk to the rights and freedoms of data subjects referred to in paragraph 1 is no longer likely to materialise;
- c) it would involve disproportionate effort. In such a case, there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

4. If the Controller has not already communicated the personal data breach to the data subject, the supervisory authority, having considered the likelihood of the personal data breach resulting in a high risk, may require it to do so or may decide that any of the conditions referred to in paragraph 3 are met

XII. Specific provisions

1. The Controller shall facilitate the exercise of the data subject's rights. In the cases referred to in Article 11(2) of GDPR, the Controller shall not refuse to act on the data subject's request for exercising their rights, unless the Controller demonstrates that it is not in a position to identify the data subject.

2. The controller shall provide information on action taken on a request to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form

means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject

3. If the Controller does not take action on the data subject's request, the Controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

4. Information provided to the data subject and any communication and any actions taken shall be provided free of charge. Where requests from the data subject are manifestly unfounded or excessive, particularly because of their repetitive character, the controller may either:

- a) require a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested;
- b) or refuse to act on the request.

5. If the Controller has reasonable doubts concerning the identity of the natural person making the request, the Controller may request the provision of additional information necessary to confirm the identity of the data subject.