

# PRINCIPLES FOR THE PROCESSING AND PROTECTION OF PERSONAL DATA

## Data controller:

Business name: Royal Water s.r.o.  
Registered office: Palatínova 2732/61, Komárno 945 01  
Company ID: 50 913 131  
Email: [info@royalwater.com.mt](mailto:info@royalwater.com.mt)  
Phone: +420 776 006 254

(hereinafter referred to as the '*Controller*')

## Contact details of the person authorised by the Controller

The data subject may contact the following person authorised by the Controller ('DPO') at any time regarding personal data protection:

Name and surname: Milan Svojsik  
Email: [info@royalwater.com.mt](mailto:info@royalwater.com.mt)  
Phone: +420 776 006 254

## I. General information

1. The data controller is a trading company mainly engaged in retail and wholesale, particularly in bottling, supplying, importing and exporting mineral and healthy water, as well as other activities, which are registered as businesses in the Commercial Register.

2. In carrying out the above activities, the data subjects may voluntarily provide the data controller with their personal data identifying the user as a particular person, in particular by email, by completing a form, in relation to events organised by the data controller or within legal relations entered into by the data subjects and the data controller, such as by concluding an employment agreement, civil, commercial or other agreement.

3. The Principles for the Processing and Protection of Personal Data (hereinafter referred to as the '*Principles*') shall apply to all situations where data subjects personal data are processed by the data controller, and simultaneously, include a range of information related to personal data processing that have to be provided to you by the data controller.

## II. Interpretation of certain terms

**GDPR - Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27<sup>th</sup>, 2016 on the protection of natural persons with regard to personal data processing and on the free movement of such data.**

**Personal data** - means any information related to an identified or identifiable natural person (or 'data subject'), that means a person who can be identified directly or indirectly, particularly by reference to an identifier such as name, identification number, location data, online identifier, or by reference to one or more elements that are specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Processing** - means any operation or set of operations with personal data or sets of personal data, such as obtaining, recording, organising, structuring, storing, reprocessing or altering, searching, browsing, using, providing by transmission, dissemination or otherwise, regrouping or combining, restricting, erasure or disposal of personal data, whether carried out by automated or non-automated means.

**Filing system** - means any structured set of personal data which is accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis

**Controller** - means any natural or legal person, public authority, agency or other entity, which alone or together with others determines the purposes and means personal data processing.

**Processor** - means any natural or legal person, public authority, agency or other entity that processes personal data on Controller's behalf.

**Data subject's consent** - means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which they, by a statement or by a clear affirmative action, signifies agreement to personal data processing related to them.

## III. Method, purpose and legal basis of the personal data processing

1. The Controller processes your personal data, both automatically and manually, but **only to the extent necessary to fulfil the purpose of the processing and for the necessary time** (i.e., if the personal data are provided beyond this scope or if the purpose or legal basis of their processing is cancelled, the Controller no longer processes such data and removes them from his or her filing systems).

2. The purpose and legal basis of personal data processing (i.e., the reason for the processing) the data subjects is in particular:

- entering into contractual and other similar legal relations with the controller and related matters, e.g., fulfilling contractual obligations in relation to mineral water, etc. within the meaning of Article 6(1)(b) of GDPR;
- exercising the Controller's legitimate interests within the meaning of Article 6(1)(f) of GDPR, particularly sending of news and newsletters to persons who have previously provided their data to the Controller in order to improve the services provided and to provide related information;
- fulfilling the Controller's legal obligations pursuant to Article 6(1)(c) of GDPR, particularly in relation to fulfilling the Controller's legal obligations as the employer towards their employees, fulfilling obligations pursuant to the Act on Accounting, etc.;
- direct marketing on the basis of the data subject's consent in accordance with

Article 6(1)(a) of GDPR, e.g., sending news and newsletters to persons who have not yet provided their data to the Controller;

- personal data processing on the basis of the data subject's consent pursuant to Article 6(1)(a) of GDPR in relation to the Controller's activities, in accordance with the purpose that the consent was given, i.e., personal data processing at events organised by the Controller, unless the Controller has a legitimate interest;
- personal data processing in order to protect the data subject's vital interests in accordance with Article 6(1)(d) of GDPR, e.g., when it is necessary to obtain and subsequently process personal data in order to call the ambulance.

3. As the data subject, you provide your personal data to the Controller at your discretion (i.e., you are not obligated to do so). However, the Controller states that **in certain cases it is not possible to perform the actions you require without providing certain personal data** (for example, it is not possible to enter into an employment agreement with the Controller or to place an order or perform another agreement without providing certain personal data).

4. If the processing of the provided personal data requires your consent as the data subject, the Controller is obliged to ask for it in advance. When processing personal data based on consent to processing, you may withdraw your consent at any time, in the same simple way as it was granted (e.g., in the case of electronically granted consent, your consent can be revoked by sending an email to the DPO or directly to the Controller), **but without affecting the lawfulness of the personal data processing prior to the consent's withdrawal.**

#### **IV. Scope of personal data processing**

1. The controller processes your personal data only to the extent necessary for the purpose of processing. For example, for the purpose of concluding an agreement, the controller generally does not need to obtain and process your photo, therefore processes only personal data necessary to fulfil the rights and obligations arising from the agreement (i.e., name and surname, address, contact, or other necessary data). Simultaneously, if personal data is provided beyond the necessary scope, the controller shall not process such data further and shall remove them from their filing systems.

#### **V. Personal data security and storage period**

1. The personal data you provide voluntarily are stored in a secure environment and will only be used by the controller to fulfil their obligations and/or liabilities towards persons who have provided personal data to the controller in any other way, and only to the extent resulting from the information provided, for the period necessary for applying the rights and fulfilling the obligations of the Controller resulting from the concluded agreement, legislation, or for the period with which you have agreed (unless otherwise provided by law or agreement, this period is a maximum of 10 years from the provision of personal data).

2. Regarding your personal data storage period, the Controller particularly refers to the fact that storing personal data also has its basis in some legislation, such as the Act on Accounting, which directly imposes their storage for a certain period, and at the same time, their long-term storage is also necessary because of the possibility of exercising the Controller's rights, especially with reference to the statutory limitation periods. However, the Controller only stores the data where storage is necessary.

3. The Controller declares that they ensured adequate technical and organisational measures to secure personal data processing, and at the same time, declares that your data will be disposed of in a manner providing sufficient guarantees against their possible misuse after the processing and storage period expires.

## **VI. Personal data processing by entities other than the controller**

1. The Controller declares that they will not rent, sell or exchange to the third party the data subject's personal data (i.e., data such as name, address, telephone number, email, etc. that identify the user as a specific person) without the express consent of you as a data subject; however, this is without prejudice to the Controller's ability to designate a processor for personal data processing in accordance with these Principles and GDPR. The controller's conditions may include in particular:

- persons involved in the carriage of goods if sent by the Controller;
- persons involved in the execution of payment and other services on the basis of the order, etc.;
- persons ensuring website operation and related services;
- persons providing marketing services;
- persons performing accounting services; a lawyer, etc. in case of exercising the Controller's rights.

2. Similarly, it's without prejudice to the fact that your voluntarily provided data may also be accessed by **other persons specifically authorised and duly instructed by the controller (e.g., persons employed by the controller), but solely for the purposes strictly necessary for your personal data processing in accordance with the purpose for which they were provided.** In legal cases, the controller is also authorised or obliged to transmit certain personal data on the basis of applicable legislation, such as to law enforcement authorities or other public authorities.

## **VII. Profiling and automated decision-making**

1. The Controller declares that the personal data provided by you are not used for profiling purposes. Similarly, your personal data are not subject to automated decision-making.

## **VIII. Data transfer to a third country**

1. The Controller also declares that your personal data is not transferred to a third country (i.e., outside the EU) or to an international organisation.

## **IX. Data subject's declaration**

1. Before voluntarily submitting information to the Controller, you declare that all of the personal data you provide is true, accurate, current and complete and, where applicable, you give your voluntary consent to process them.

## **x. Information on the data subject's rights**

1. As a data subject, you have certain rights under GDPR, including:

- the right to lodge a complaint with a supervisory authority (i.e., the Slovak Republic Personal Data Protection Office, with its registered office at Hraničná 12, 820 07 Bratislava 27, Slovak Republic, Company ID: 36 064 220, phone: +421 2 3231 3220);
- the right to request access to personal data;
- the right to rectify and erase personal data;
- the right to restrict processing, the right to object to personal data processing
- the right to data portability.

2. Full information for the data subject on all the rights conferred on him or her by GDPR in relation to personal data protection can be found at the Controller's registered office or, if required, in electronic form provided by the controller.

## **xI. Final provisions**

1. These Principles come into effect on May 25<sup>th</sup>, 2018.

2. The Controller is entitled to change these Principles. The Controller shall publish a new version of the Principles as soon as it is adopted.

In Komárno, on May 24<sup>th</sup>, 2018

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**Royal Water s.r.o.**  
represented by Michal Židek,  
Executive Director