## greenway

## GreenWay Infrastructure s.r.o.

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## PERSONAL DATA PROTECTION POLICY

**OPERATOR:** GreenWay Infrastructure s.r.o; for details please see above.

**CONTACT INFORMATION:** Please see above.

## PURPOSE AND BASIS FOR PERSONAL DATA PROCESSING, CHARACTER OF THE REQUEST TO PROVIDE PERSONAL DATA AND CONSEQUENCES RESULTING FROM FAILURE TO PROVIDE PERSONAL DATA:

- (I) Client's data in the registration form, shortened form for the client, who/which uses one-time recharging service, and client's data in his/her client account, including data on his/her use of the service (except data about the vehicle(s)) are required and processed for the purpose of contract performance and taking measures prior to the conclusion of the contract based on the request of the (future) client. Data processed for this purpose are processed in compliance with the law. Failure to provide these data (in scope of the mandatory data in the form) results in non-conclusion of the contract, such as the date of birth) does not result in non-conclusion of the contract.
- (II) <u>Data about the client's vehicle(s) in the registration form</u> are required and processed in order to provide the client support in using the recharging service (e.g. in the event of problems with recharging) and for the purpose of electromobility and recharging services analyses, the outcome of which are aggregate and generalised data. Data processed for this purpose are processed based on the consent of the data subject.
- (III) <u>Data about the use of recharging service by the client</u> are collected from the internal (mainly) automated systems of the company GreenWay and processed for the purpose of electromobility and recharging services analyses, the outcome of which are aggregate and generalised data. Data processed for this purpose are processed based on the consent of the data subject.
- (IV) <u>Client's contact data specified in the registration form</u> are also processed for the purpose of marketing communication of the company. Data processed for this purpose are processed based on the consent of the data subject.

These rules apply to personal data processing in all types of applications used by the clients of GreenWay (web applications as well as mobile applications).

**CATEGORIES OF PERSONAL DATA RECIPIENTS:** The recipients of the data subject's personal data shall be the subjects acting as intermediaries of the company GreenWay, i.e. subjects that will process personal data on behalf of the company GreenWay.

**PERSONAL DATA RETENTION PERIOD.** The company GreenWay shall retain the personal data of the affected parties for the duration of the contract with the company GreenWay.

Data processed for analyses shall be retained by the company GreenWay for the period of five years after the termination of the client's contract with the company GreenWay. Effects of client's consent withdrawal shall remain unaffected. Provisions of specific laws stipulating data and documentation retention periods shall remain unaffected.

RIGHTS OF THE DATA SUBJECT: Data subject has the following rights:

- (I) the right to require access to personal data of the company GreenWay under Section 21 of Act No. 18/2018 Coll. on Personal Data Protection and on Amendments and Supplements to certain acts (hereinafter referred to as the "Act"),
- (II) the right to rectify their personal data under Section 22 of the Act,
- (III) the right to delete their personal data under Section 23 of the Act,
- (IV) the right to limit processing of their personal data under Section 24 of the Act,
- (V) the right to portability of their personal data under Section 26 of the Act,
- (VI) the right to object to the processing of their personal data under Section 27 of the Act,
- (VII) the right to withdraw their consent with the processing of personal data at any time under Section 14 of the Act,
- (VIII) the right to initiate procedure for the personal data protection before the Office for Personal Data Protection of the Slovak Republic under Section 100 of the Act.

Data subject can exercise the rights stated above also under 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, and repealing Directive 95/46/EC (General Data Protection Regulation).

**EXISTENCE OF AUTOMATED INDIVIDUAL DECISION MAKING INCLUDING PROFILING.** Personal data indicated in the registration form of the company GreenWay are processed automatically with the result that the registration is completed and the company GreenWay automatically confirms conclusion of the contract to every applicant who fills in all the mandatory items in the registration form. The company GreenWay does not perform any other automated processing of the data with legal effect.

6<sup>th</sup> November 2019

