

Privacy statement

Introduction

Company **EP Consulting & Partner s. r. o.** (further as “EPC”, “us”, or “our”) describes below why and how it collects and uses personal data and provides information about individuals’ rights. We may use personal data provided to us for any of the purposes described in this transparency notice or as otherwise stated at the point of collection.

Security

We take the security of all the data we hold very seriously. We have a framework of policies, procedures and training in place covering data protection, confidentiality and security and regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

Legal basis for processing

Legal bases for each processing activity are specified in the relevant sections above. When we process personal information for our legitimate interests, we make sure to consider and balance any potential impact on a data subject (both positive and negative), and the data subject’s rights under data protection laws. Our legitimate business interests do not automatically override interests of the data subjects - we will not process personal data for activities where our interests are overridden by the impact on the data subject (unless we have the consent or are otherwise required or permitted to by law).

When and how we share personal data and locations of processing

We will only share personal data with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality, and security standards.

Personal data held by us may be transferred to:

- Third party organizations that provide applications/functionality, data processing or IT services to us,
- We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems. For example, providers of information technology, cloud based software as a service providers, website hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres.
- Third party organisations that otherwise assist us in providing goods, services or information
- Auditors and other professional advisers
- Law enforcement or other government and regulatory agencies or to other third parties as required by, and in accordance with, applicable law or regulation
- Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

Changes to this privacy statement

We will keep this privacy statement under regular review.

This privacy statement was last updated on 31 January 2019.

Data controller and contact information

The data controller is EP Consulting & Partner s. r. o.

If you have any questions about this privacy statement or how and why we process personal data, please contact us at:

EP Consulting & Partner s. r. o.
Prievozská 4D, Blok E, 821 09 Bratislava
Email: epconsulting@epconsulting.sk
Phone: 00421 903 447751

Individuals' rights and how to exercise them

Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights. Where we decide how and why personal data is processed, we are a data controller and include further information about the rights that individuals have and how to exercise them below.

Access to personal data

You have a right of access to personal data held by us as a data controller. This right may be exercised by emailing us at epconsulting@epconsulting.sk

Amendment of personal data

To update personal data submitted to us, you may email us at epconsulting@epconsulting.sk

When practically possible, once we are informed that any personal data processed by us is no longer accurate, we will make corrections (where appropriate) based on your updated information.

Withdrawal of consent

Where we process personal data based on consent, individuals have a right to withdraw consent at any time. We do not generally process personal data based on consent (as we can usually rely on another legal basis). To withdraw consent to our processing of your personal data please email us at epconsulting@epconsulting.sk

Right to restrict or object to our processing of personal data

You have the right to restrict or object to the processing of your personal information at any time, on reasonable grounds relating to your particular situation, unless the processing is required by law.

In such case, we will no longer process or restrict the processing of the personal data, unless we can demonstrate compelling legitimate grounds for the processing or for the establishment, exercise or defense of legal claims.

Other data subject rights

This transparency notice is intended to provide information about what personal data we collect about you and how it is used. As well as rights of access, amendment and restriction or objection to processing referred to above, individuals may have other rights in relation to the personal data we hold, such as a right to erasure/deletion and the right to data portability.

If you wish to exercise any of these rights, please send an email to epconsulting@epconsulting.sk

Complaints

We hope that you won't ever need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to epconsulting@epconsulting.sk. We will look into and respond to any complaints we receive.

You also have the right to lodge a complaint with the Office for Personal Data Protection of the Slovak Republic Office. For further information on your rights and how to complain to the Office, please refer to the <https://dataprotection.gov.sk/uouu/>

Appendix 1 – Our processing activities

Appendix 1

Our processing activities

Business Contacts

Collection of personal data

EPC processes personal data about contacts (existing and potential EPC clients and/or individuals associated with them) in a process of managing customer relationship (the “Contacts overview”).

The collection of personal data about contacts and the addition of that personal data to the Contacts overview is initiated by a EPC user and will include name, employer name, contact title, phone, email and other business contact details. In addition, the EPC user may collect data from EPC email (sender name, recipient name, date and time) and calendar (organiser name, participant name, date and time of event) systems concerning interactions between EPC users and contacts or third parties.

Use personal data

Personal data relating to business contacts may be visible to and used by EPC users to learn more about an account, client or opportunity they have an interest in, and may be used for the following purposes:

- Developing our businesses and services
- Providing information to you about us and our range of services
- Making personal data available to EPC employees for performing services and for offering new services

Legal basis for processing

We will process our business contacts’ personal data based on our legitimate business interests or the consent, if the data subject has been requested to express one. We have an interest in marketing our services or providing communications which we think will be of interest to recipients.

Data retention

Personal data will be retained in the Contacts overview for as long as it is necessary for the purposes set out above (e.g. for as long as we have, or need to keep a record of, a relationship with a business contact).

Individual clients and other individuals whose personal data we obtain in connection with providing services to our clients

Collection of personal data

Our policy is to collect only the personal data necessary for specified purposes and we ask our clients only to share personal data where it is strictly needed for those purposes.

Where we need to process personal data to provide our services, we ask our clients to provide the necessary information to other data subjects concerned, such as family members, regarding its use.

Given the diversity of the services we provide to personal clients (www.epconsulting.sk), we process many categories of personal data, including as appropriate for the services we are providing:

- Contact details;
- Business activities;
- Family information;
- Income, taxation and other financial-related details; and
- Investments and other financial interests.

For certain services or activities, and when required by law or with an individual's consent, we may also collect special categories of personal data.

Generally, we collect personal data from our clients or from a third party acting on the instructions of the relevant client.

Use of personal data

We use personal data for the following purposes:

Providing professional services

We provide a diverse range of professional services. Some of our services require us to process personal data in order to provide advice and deliverables.

Administering, managing and developing our businesses and services

We process personal data in order to run our business, including:

- managing our relationship with clients;
- developing our businesses and services (such as identifying client needs and improvements in service delivery);
- maintaining and using IT systems;
- administering and managing our website and systems and applications.

Security, quality and risk management activities

We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We monitor the services provided to clients for quality purposes, which may involve processing personal data stored on the relevant client file. We have policies and procedures

in place to monitor the quality of our services and manage risks in relation to client engagements. We collect and hold personal data as part of our client engagement and acceptance procedures.

Providing our clients with information about us and our range of services

In accordance with applicable law, we use client contact details to provide information that we think will be of interest about us and our services. For example, industry updates and insights, other services that may be relevant.

Complying with any requirement of law, regulation or a professional body of which we are a member

As with any provider of professional services, we are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

Legal basis for processing

If the processing of personal data referred to in this section is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of service, the processing is based on contractual lawful basis. If the processing of data is necessary for complying with a legal obligation such as complying with tax law obligations or necessity to evidence and document professional services provided, the processing will be based on the legal obligation.. If personal data are processed for the other purposes specified above we will rely on the legitimate interest basis or the consent, if we asked the data subject for the consent.

Data retention

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation).

In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for records and other documentary evidence created in the provision of services does not exceed 10 years.

Suppliers (including subcontractors and individuals associated with our suppliers and subcontractors)

Collection of personal data

We collect and process personal data about our suppliers (including subcontractors and individuals associated with our suppliers and subcontractors) in order to manage the relationship, contract, to receive services from our suppliers and, where relevant, to provide professional services to our clients.

Use of personal data

We use personal data for the following purposes:

- **Receiving services**

We process personal data in relation to our suppliers and their staff as necessary to receive the services. For example, where a supplier is providing us with facilities management or other outsourced services, we will process personal data about those individuals that are providing services to us.

- **Providing professional services to clients**

Where a supplier is helping us to deliver professional services to our clients, we process personal data about the individuals involved in providing the services in order to administer and manage our relationship with the supplier and the relevant individuals and to provide such services to our clients (for example, where our supplier is providing people to work with us as part of a EPC team providing professional services to our clients).

- **Administering, managing and developing our businesses and services**

We process personal data in order to run our business, including:

- managing our relationship with suppliers;
- developing our businesses and services (such as identifying client needs and improvements in service delivery);
- maintaining and using IT systems;
- administering and managing our website and systems and applications.

- **Security, quality and risk management activities**

We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to our suppliers. We collect and hold personal data as part of our supplier contracting procedures. We monitor the services provided for quality purposes, which may involve processing personal data.

- **Providing information about us and our range of services**

Unless we are asked not to, we use business contact details to provide information that we think will be of interest about us and our services.

- **Complying with any requirement of law, regulation or a professional body of which we are a member**

As with any provider of professional services, we are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

Legal basis for processing

If the processing of personal data referred to in this section is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary to be recipient of the service, the processing is based on contractual lawful basis. If the processing of data is necessary for complying with a legal obligation such as complying with tax law obligations or necessity to evidence and document professional services received, the processing will be based on the lawful basis. If personal data are processed for the other purposes specified above we will rely on the legitimate interest basis (such as receiving services, providing services, administration, managing and developing our business, security, quality and risk management activities) or the consent, if we asked the data subject for the consent.

Data retention

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation).

Personal data may be held for longer periods where extended retention periods are required by law or regulation and in order to establish, exercise or defend our legal rights.

Visitors of our web site

Collection of personal data

Visitors to our websites are generally in control of the personal data shared with us. We may capture limited personal data automatically via the use of cookies on our website. For more information, please, have a look at the section on cookies below.

Visitors are also able to send an email to us through the website. Their messages will contain the user's name, email address and phone number, as well as any additional information the user may wish to include in the message.

We ask that you do not provide sensitive information (such as race or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; physical or mental health; genetic data; biometric data; sexual life or sexual orientation; and, criminal records) to us when using our website; if you choose to provide sensitive information to us for any reason, the act of doing so constitutes your explicit consent for us to collect and use that information in the ways described in this privacy statement or as described at the point where you choose to disclose this information.

Cookies

We use small text files called 'cookies' which are placed on your hard drives to assist in personalizing and enriching your browsing experience by displaying content that is more likely to be relevant and of interest to you. The use of cookies is now standard operating procedure for most websites. However if you are uncomfortable with the use of cookies, most browsers now permit users to opt-out of receiving them. After termination of the visit to our site, you can always delete the cookie from your system if you wish.

You can find out more details regarding our use of cookies on our Cookies page.

Use of personal data

Typically, personal data is collected to:

- enquire for further information;
- submit curriculum vitae;
- monitor and enforce compliance with our terms and conditions for use of our website;
- administer and manage our website,
- aggregate data for website analytics and improvements.

Unless we are asked not to, we may also use your data to contact you with information about EPC's business and services, and other information which may be of interest to you. Should visitors subsequently choose to unsubscribe from mailing lists they may contact us by email epconsulting@epconsulting.sk.

Our websites do not collect or compile personal data for the dissemination or sale to outside parties for consumer marketing purposes or host mailings on behalf of third parties. If there is an instance where such information may be shared with a third party, the visitor will be asked for their consent beforehand.

Legal basis for processing

We will process personal data of visitors to our website based on our legitimate business interests or the consent, if the data subject has been requested to express one. For example, we have an interest in making sure our marketing is relevant for specified individuals, so we may process personal data to send our marketing that is tailored to the interests of a data subject.

Data protection

Personal data collected via our websites will be retained by us for as long as it is necessary (e.g. for as long as we have a relationship with the relevant individual).