



## Notification

*under Act No. 18/2018 Coll. on the Protection of Personal Data and on amendments to certain laws, as amended (hereinafter the "act"); and 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 (hereinafter referred to as the "regulation")*

**Under the act and the regulation, the controller notifies of the following facts (i) the customer (hereinafter referred to as the "customer") with whom the controller concludes a contract in which the controller acts as a supplier (hereinafter referred to as the "contract") and (ii) persons who are employees of the customer, act on their behalf or whose personal data are stated in the contract or documents issued on the basis of the contract (hereinafter referred to as the "other data subjects"):**

- a) the Controller's identification data: buckle up, s. r. o., with registered seat at: Šancová 6073/6C, 902 01 Pezinok, Company registration number: 45 702 187, registered in the Commercial Register of the Bratislava III City Court, section: Sro, insert No. 66930/B;
- b) purpose of processing personal data:
  - customer: (i) exercise of rights and obligations arising from the contract – contract fulfillment, (ii) accounting and invoicing, (iii) management of receivables after due date,
  - other data subjects: (i) valid conclusion and fulfillment of contractual relations, (ii) accounting and invoicing, (iii) management of receivables after due date,
  - customer and other data subjects: offer of services and products related to the existing contractual relationship and offer adapted to the individual needs of the customer;
- c) legal basis:
  - (i) if the customer is the data subject and the purpose of processing is exercise of rights and obligations arising from the contract, then the legal basis is performance of the contract;
  - (ii) if the other data subject is the data subject and the purpose of processing is valid conclusion and fulfillment of contractual relations, then the legal basis is legitimate interest of the controller;
  - (iii) for the purpose of management of receivables after due date the legal basis is legitimate interest of the controller in claiming its legal rights and ensuring fulfillment of receivables and other legal rights of the controller;
  - (iv) for the purpose of accounting the legal basis is compliance with statutory legal obligations of the controller; and
  - (v) for the purpose of offer of services and products related to the existing contractual relationship and offer adapted to the individual needs of the customer the legal basis is legitimate interest of the controller;

- d) the extent of the personal data: the personal data contained in the contract concluded between the controller and the customer and/or on the accounting documents, such as name, surname, title, permanent residence (place of business), email address, telephone number, bank account number, signature, job position, and in the case of electronic signing also the IP address, whereas for the purpose according to item c) section (v) above only the title, name, surname, job position, email address and telephone number of the data subject shall be processed;
- e) the provision of personal data is necessary for the purpose of concluding the contract and its implementation;
- f) the circle of recipients to whom it is assumed that the personal data will be provided/accessed:
- personal data are processed to the necessary extent by the processor providing the controller with hosting services (server),
  - the data for the purpose according to item c) section (iv) above are also processed by the processor providing the controller with accounting software and the processor providing the controller with bookkeeping services,
  - the data of other data subjects for the purpose according to item c) section (ii) above are also processed by the processor providing the controller with services including creation of electronic works by programming and related activities (a sub-contractor),
  - the data for the purpose according to item c) section (v) above are also processed by the processor providing the controller with marketing services,
  - DocuSign in the case of electronic signing, in which case data may be transferred to a third country - the U.S., however, DocuSign uses Standard Contractual Clauses (SCCs) and approved EU Binding Corporate Rules (BCRs), which guarantee an adequate level of personal data protection;
- g) the retention period of personal data: 10 years, however, data processed for the purpose according to item c) section (v) above are processed only for the duration of the contractual relationship and 2 years after its termination or after the last delivery of goods or services;
- h) with any questions regarding the processing of personal data, you can contact us by sending an email message to the following email address where you can also claim the below stated rights: [gdpr@buckleup.sk](mailto:gdpr@buckleup.sk);
- i) a data subject (a person whose personal data are processed by the controller) can exercise the following rights:
1. the right to request **access** to your personal data - you may ask us to access the personal data we process about you;
  2. the right to **rectification** of personal data - you may ask us to correct inaccurate or incomplete personal data we process about you;
  3. the right to **erasure** of personal data - you may ask us to delete your personal data if, for example, one of the following situations occurs:
    - i. personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
    - ii. your personal data have been unlawfully processed;
    - iii. your personal data have to be erased for compliance with a legal obligation in Union or Member State law to which we are subject;

4. the right to **restrict the processing** of personal data - you may ask us to restrict the processing of your personal data if one of the following situations occurs:
  - i. you have contested the accuracy of your personal data, for a period enabling us to verify the accuracy of your personal data;
  - ii. the processing of your personal data is unlawful and you oppose the erasure of these data and request the restriction of their use instead;
  - iii. we no longer need your personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims;
  - iv. you objected to processing of your personal data pending the verification whether the legitimate grounds of our company as a controller override your legitimate grounds;
5. the right to **object** to processing of personal data - you may at any time object against processing of your personal data by our company for direct marketing purposes based on our legitimate interest. However, in this case, we will not use your data for direct marketing purposes;
6. the right to **portability** of your personal data - in cases foreseen by generally binding legal regulations (act and/or regulation), you have the right to receive the personal data concerning you, which you provided to us, in a structured, commonly used and machine-readable format, taking into account that this right shall not adversely affect the rights and freedoms of others;
7. the right to **lodge a complaint** to the Office for the Protection of Personal Data of the Slovak Republic, Budova Park One, Námestie 1. mája 18, 811 06 Bratislava, [www.uoou.sk](http://www.uoou.sk) to initiate the procedure about the protection of personal data under § 99 et seq. of the act.