

INFORMATION FOR THE BUSINESS PARTNERS, THEIR EMPLOYEES AND OTHER SUBJECTS IN THE CONTRACTUAL RELATIONSHIP

**In accordance with the obligation to inform data subject about the personal data processing
the non – profit organization**

EDYN, n.o.

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as a controller would like to inform you that based on the Regulation EU 2016/679 of European parliament and the Council of 27 April 2016 on the protection of natural persons with to the processing of the personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter referred to as the „Regulation“), as well on the Act no. 18/2018 Coll. on the personal data protection (hereinafter referred to as the „Act“) the GDPR EDYN Handbook was issued (hereinafter referred to as the „GDPR Handbook“).

EDYN recommends to read the GDPR Handbook.

EDYN would like to inform you about the processing the personal data within the fulfillment of EDYN's obligations as non-profit organization providing services of general interest. When processing the personal data, you are in a position as EDYN's business partner, employee of EDYN's business partner or other subject in contractual relationship with EDYN, i. e. you are data subject, whose personal data are processed.

Principles of processing personal data

Your personal data will be kept secure only for the time necessary to fulfill the purpose of the processing. Your personal data will be accessed to the persons authorized by the controller and who process your personal data in accordance with the instruction of the Controller, and with GDPR Handbook.

Registered data:

Basic personal data: name, surname, permanent residence address (delivery address), date of birth, sex, citizenship/ business name, register seat, ID, registration;

Contact data: email, phone number

Bank data: IBAN

Photos or audiovisual recordings: made in EDYN programs or sent by the data subject and only with the Consent

Special categories: data on political affiliation, data on being part of a gender, ethnic or religious minority are processed in accordance with § 16 sect. 2 letter d) of the Act and the article 9 sect. 2 letter d) of the Regulation.

Legal basis

The personal data are processed mainly for the purpose of fulfilling legal and contractual obligations as well as to protect EDYN legitimate interests, EDYN clients and other subjects. In the case of the photos or audiovisual recordings, and special categories EDYN processes hereof on the basis of your express consent which can be revoke at any time.

EDYN collects personal data mainly on the basis of direct or indirect communication with data subject, i. e. from the data subject, by the enter to the EDYN’s property, by the registration, by the filling out the form o EDYN’s website or by the signing of the contract.

Personal data can be processed for the following purposes and legal basis:

Purpose	Legal basis	Explanation
Personnel purposes – keeping records of the persons in contractual relationship	Legitimate interest pursuant to Art. 6 sect. 1 let. b) of the Regulation	Personal data are necessary for proper and valid conclusion of the contract
Control mechanisms of the business partners and their employees	Legitimate interest pursuant to Art. 6 sect. 1 let. f) of the Regulation	In some case Contractual partners and their employees may be subject to a control mechanism in order to ensure the proper and efficient performance of the contract, e. g. the confirmation the goods or services delivery by relevant business partner employee.
Business communication with contractual partner employees and members and/ or other persons in the similar position	Legitimate interest pursuant to Art. 6 sect. 1 let. f) of the Regulation	Legitimate interest on the efficient communication with the EDYN contractual partners and other persons in the similar relationship with EDYN, as well as on the conclusion of the contract and efficient performance hereof.
Fulfillment of the EDYN contractual obligations towards the third subject	Legitimate interest pursuant to Art. 6 sect. 1 let. f) of the Regulation	EDYN has concluded contracts with the international organizations which support the EDYN activities financially and further to work to develop the EDYN’s purposes fulfillment. In order to comply with its contractual obligation, EDYN is obliged to inform these organizations on its activities and among other things on the contractual partners.
Photos and audiovisual records	Express and proven consent pursuant to Art. 6 sect. 1 let. a) of the Regulation	Legitimate interests are EDYN promotion, marketing an advertising not only within internal working environment, but also to the public.

Demonstrating, asserting defending the legal claims (legal agenda)	Legitimate interest pursuant to Art. 6 sect. 1 let. f) of the Regulation	EDYN may turn to the relevant public authorities, law enforcement bodies and/ or courts in order to protect its property, rights and legally protected interests.
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Transfer to the third countries

Transfer to the third countries or international organizations takes place. The main recipients are international organizations as IRI, NDI, USAID, which seated in USA. The personal data transfer may occur on the basis of standard contractual clauses approved by the European Commission or in other special events the international personal data transfer occurs on the basis of the exception for special situation within of the Art. 49 of the Regulation.

Time of processing the personal data

In general, EDYN always determines the retention period of personal data in relation to the specific purpose through internal policy, although in such case the retention period of time depends on the duration of the contractual relationship and 4 years after the termination hereof. The personal data which are necessary to keep longer in accordance to tax, accounting and other law, will be processed pursuant to the relevant legal acts (e.g.: 10 years account document). EDYN processes personal data as long as necessary for the purposes herefor the personal data are processed.

Purpose	Retention period
Personnel purposes	During the valid position as EDYN members, no more than 3 years after withdrawal the membership
Control mechanisms	5 years in the case of inferring the contractual liability from data subject, otherwise 2 years
Fulfillment of the EDYN contractual obligations towards the third subject	Until the termination of contract and expiration of the protective retention period, usually 3 years of contract termination
Photos and audiovisual records	Until the withdrawal of the Consent
Demonstrating, asserting defending the legal claims (legal agenda)	Until the legal termination of the proceeding associated with using or waiving remedies or until the claim is satisfied (e.g.: by the fulfillment of the commitment) or rights applied (e.g.: by submitting the action) or until the lapse of the right or legal claim (e.g.: limitation period)

Recipient's category

The confidentiality of personal data is taken very seriously by EDYN, therefore EDYN established the rules to ensure that personal data are shares only with the authorized employees or with verified third party. EDYN employees have access to personal data on the basis of much needed information, which are usually limit by the position, and department of the specific employee. EDYN coworks with subcontractors, who help to provide services and they may process personal data for EDYN. EDYN ensures that selection of verified subcontractors and personal data processed by them are in accordance with the Regulation.

Recipients of the personal data: shipping and postal companies; professional advisors (e.g.: advocates); executors, notaries, courts, translators; standard software providers (e.g.: Microsoft, Google); technical, development and administration of IT system support providers; clouding and hosting services providers; Health and safety trainings; external collaborators; authorized employees of EDYN and aforementioned subjects.

Data subject rights:

Right to information:

The data subject has the right to be informed about the purposes of the personal data processing, the categories of personal data processed, the recipients of such personal data, the retention period of personal data, the rights of the data subject, the origin of personal data as well as automated decision-making.

Right to access of personal data:

The data subject has the right to provide copies of the personal data EDYN has about him/her, as well as information on how EDYN uses personal data. Personal data will be provided to the data subject in writing, if the data subject does not request another method of providing. In the case the data subject requested to provide such data in electronic form, EDYN will provide this data electronically.

Right to rectification:

As the Controller, EDYN takes appropriate technical and organizational measures to ensure the accuracy, completeness and timeliness of the data EDYN processes. In case you think that the personal data are inaccurate, incomplete or out of date, you have the right to modify, supplement or update them.

Right of erasure (right to be forgotten):

The data subject has the right to request the deletion of personal data in the case the personal data processed by EDYN, have no longer been necessary for the mainly purpose. This right is not absolute and needs to be assessed in the light of the relevant circumstances. In the event EDYN still has legal and regulatory obligations to retain personal data, EDYN will not be able to comply with the request.

Right to restrict processing:

In certain circumstances, the data subject is entitled to require EDYN to stop processing his or her personal data, for example if you think that the personal data processed by the Controller may be incorrect, inaccurate or no longer need to be processed.

Right to data portability:

The data subject has the right to request the transfer of provided personal data to the third party of his/her choice. This right applies only to personal data that EDYN has processed on the basis of the consent or on the basis of the contract.

Right to object the processing:

The data subject has the right to object to the processing of personal data. If you think that EDYN has no legitimate reason to process personal data and you object the processing, EDYN will not further process your personal data unless there are compelling reasons that outweigh your interests, rights and freedoms, or in the case the personal data processing serves to assert, enforce or defend legal claims.

Right to file a complaint to the supervisory authority (personal data protection):

In case, you believe that your rights regarding the personal data protection have been violated, you can file a complaint to the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic, with its registered office at Hraničná 12, 820 07 Bratislava 27, phone number: +421/2/3231 3214, e-mail: statny.dozor@pdp.gov.sk, <https://dataprotection.gov.sk>.

Right to withdraw the consent:

In cases EDYN processes personal data on the basis of the consent, the data subject has the right to revoke the consent anytime. The consent may be revoked electronically by e-mail address, in writing by notice of the consent revocation or in another manner equivalent to the consent.

Right to compensation:

In the event you think that EDYN action is in the conflict of the Act and therefore you have suffered material or non-material damage, you have the right to compensation for damages against the Controller in accordance with the provisions of the Civil Procedure Code.

EDYN Social networks:**Facebook**

Meta Platforms Ireland Limited., seated: 1601 South California Avenue, Palo Alto, CA 94304, USA (hereinafter referred to as „**Facebook**“). Facebook may associate your website visit with your user account. Facebook stores the information obtained about you as user profiles and uses it for its own advertising purposes, market research and / or customization of its services and tools for registered users. Such evaluations are carried out in particular to inform other Facebook users about your activities on EDYN website.

You have the right to object to the creation of such user profiles but you must contact Facebook. For more information on the purpose, scope of data collection and processing through Facebook, please refer to the Facebook Privacy Statement at the following link: <https://www.facebook.com/policy.php>.

LinkedIn

The company LinkedIn Corporation, seated: 1000 W Maude Ave Sunnyvale (HQ), California, USA, may processed your personal data. More information about can be found in the privacy policy LinkedIn as well as in the essential parts of the joint operators' agreement available at this link: <https://legal.linkedin.com/pages-joint-controller-addendum>.

Instagram

It's part of Facebook. See the Instagram privacy policy available at this link for more information https://help.instagram.com/519522125107875/?maybe_redirect_pol=0.

Twitter

Social network Twitter, Inc., seated: 1355 Market Street, Suite 900, San Francisco, CA 94103 U.S.A. EDYN has no influence or control over the personal data processing by the Twitter. For more information see the privacy policy on the personal data processing at this link: <https://twitter.com/privacy?lang=en>

In accordance with the principle of minimizing the personal data retention within the meaning of § 10 of the Act 18/2018, all provided personal data are a necessary legal or contractual requirement to fulfill the purpose of their processing. Failure to provide the mandatory data necessary to conclude the contract with the Controller may result in the non-conclusion of the contractual relationship.

The personal data protection is EDYN duty. EDYN is obliged to protect personal data in an appropriate manner and therefore EDYN pay due attention to such protection. EDYN has implemented generally accepted technical and organizational standards in order to maintain the security of personal data processed, mainly against its lost, misuse, unauthorized modification or other impact on the rights and freedoms of data subject.

The personal data protection is very important for EDYN. Information EDYN are required to provide you with respect to personal data processing may modify and become out of date. EDYN reserve the right to modify and change conditions of the personal data protection to any extent and at any time. In the event EDYN change these conditions in a significant way, EDYN will bring such change to your attention, e. g. by general notice on EDYN website or by special notice by email.

If you have any queries or requests contact EDYN by email: gdpr@edyn.eu.