### Personal data protection

#### Art. 1. Basic provisions

1. The protection of personal data of our clients and other natural persons is important to us. These rules explain how we process the personal data of our clients and potential clients within ImmiCo. s. r. o. registered office at Landererova 7743/8, 811 09 Bratislava - Staré Mesto district, Slovak Republic, ID number: 55 834 248, registered in the Commercial Register of the Municipal Court Bratislava III, section: Sro, insert no. 173626/B (hereinafter referred to as the "Operator") . when providing our services . If you have any questions, you can contact us by phone at +421 911 881 200, by email at immico@immiconsulty.com or by post at our headquarters. Responsible person: JUDr. Peter Juritka

2. When processing personal data, the Operator is guided by the General Regulation of the European Parliament and the Council (EU) 2016/679 of April 27, 2016 on the protection of natural persons in the processing of personal data and on the free movement of such data, which repeals Directive 95/46/EC (General Data Protection Regulation) (hereinafter referred to as the "GDPR Regulation") and Act No. 18/2018 Coll. on the protection of personal data (hereinafter referred to as the "Act on Personal Data Protection"). The security of your data and their processing in a legal manner is of primary importance to the Operator.

3. The processing of personal data is necessary mainly so that the Operator can provide immigration and relocation services to clients, fulfill various legal and contractual obligations and finally protect the legitimate interests of the Operator, its clients and other persons.

Purpose	Legal basis	Personal Information
Clients: provision of immigration services	Contract between the operator and the data subject, the processing of personal data is necessary for the performance of the contract to which the data subject is a party	Common data
Selection of employees	Legitimate interest	Common data
books of incoming/sent post/shipments	Special laws	Comon data (name , surname address of recepient and sender )
Translation agency	Brokerage contract	Common data
Employees	Special laws (Act No. 595/2003 Coll. on income tax, VAT Act, Accounting Act and others)	Common data

# Art. 2. Purpose of processing

Contact with representative bodies	Special laws / international agreement	Common data
google mail	Special laws / international agreement brokerage contract (General terms and conditions)	Common data
referencie klientov na webe https://immiconsulty.com/	Consent	Commondata(primarilyname,surname,title,company,position),logo
Enforcement of authorized claims		Common data, data necessary for enforcement of legitimate claims
Fulfillment of the legal obligation of the prevention of legalization income from criminal activity and prevention of financing terrorism	Special laws (especially the law on protection against legalization of income from criminal activity and protection against terrorist financing, Law no. 297/2008 Coll.)	identification data of the client; all data necessary to secure client care and prevent legalization
Sending Newsletter	Consent	Common data
Complaints, claims	Law no. 250/2007 Coll. on consumer protection., Regulation of the European Parliament and the Council (EU) 2016/679 on	Common data
Employees - selection procedures	Legitimate interest	Common data
Emploee	Law regulation	Common data
invoicing of the delivered services,	Contract between Operator and data subject	Common data

1. In the event that the data subject has a contractual relationship with the Operator, the Operator processes the personal data of the data subject on the basis of the legal title of the contract, exclusively to the extent necessary to fulfill the purposes of this contract.

2. The operator processes the personal data of the data subject based on the legal title of legitimate interest or the consent of the data subject, exclusively to the extent of name, surname, address, e-mail, telephone number, the processing of which is necessary to achieve the stated object of the contract.

3. In the event that the data subject voluntarily, without the prior involvement of the Operator, notifies the Operator of his personal data, these personal data will be processed by the Operator to the necessary extent based on the legal title of legitimate interest (especially for the purpose of assessing the request of the data subject and providing an answer to the data subject).

# Art. 3. Period of retention of personal data

1. We keep personal data for as long as it is necessary for the purposes for which the personal data is processed.

2. All personal data are processed only to the extent necessary to fulfill the purposes specified in Art. 2 of these Terms and Conditions and only for the period necessary to achieve the stated purposes, but the longest period determined by the relevant legal regulations or in accordance with them.

3. Personal data processed by the Operator based on the legal title of the consent of the data subject are processed until the consent is revoked; However, the operator may process some of this data even after withdrawing consent, if he has another legal reason for doing so (e.g. to prove the correctness and legality of the procedure for processing personal data or for the possibility of defense against legal claims).

## Art. 4. Disclosure of data

1. Personal data are made available only to the extent necessary in compliance with the conditions under the Act on OOU, in accordance with the GDPR Regulation and always maintaining the confidentiality of the recipient of the data.

2. Recipients of data are mainly employees, persons who are entrusted with the execution of individual acts of immigration services, representing or collaborating lawyers, accounting advisers of the Operator, professional advisers (e.g. auditors), providers of delivered services or providers of software equipment or support of the Operator, including employees of these persons, notaries, public authorities.

3. Even if the Operator has a limited obligation to provide personal data to public authorities due to confidentiality reasons, he is obliged<sup>1</sup> to prevent the commission of a crime and we also have an obligation to report information in the area of preventing money laundering and terrorist financing.

# Art. 5. Transfer of personal data to third countries

Personal data are transferred only within the territory of the member states. The Operator does not intend to transfer personal data across borders to third countries outside the European Economic Area (EU, Iceland, Norway and Liechtenstein).

# Art. 6. Automated decision-making and profiling

No automated decision-making or profiling is used in the processing of personal data.

<sup>&</sup>lt;sup>1</sup> Art. 4 par. 9 GDPR regulations.

#### Art. 7. Collection of personal data

If you are a client of the Operator, your personal data is most often obtained directly from you. In this case, the collection of personal data is voluntary. Depending on the specific case, failure to provide personal data to the client may have an impact on the ability to provide quality immigration advice or, in exceptional cases, the obligation to refuse to provide immigration advice. We may also obtain personal data about our clients from publicly available sources, from public authorities or from other persons.

#### Art. 8. Rights of the data subject

- 1. A data subject is any natural person whose personal data is processed, regardless of whether this person is an EU citizen or not. The GDPR regulation grants the data subject several rights that he can exercise directly with the Controller (that is, the entity that processes his personal data).
- a) Right of access to data

you have the right to request from the Operator:

• Issuance of confirmation as to whether or not your personal data is being processed

• access to your personal data and other information

• providing a copy of the personal data it processes about you

• information on adequate guarantees if personal data is transferred to a third country or international organization

b) Right to repair

you have the right to request correction of your personal data from the Operator

• incorrect

• incomplete

c) Right to erasure (right to be "forgotten") $^2$ 

you have the right to claim the deletion of your personal data from the Operator if one of the following reasons is met:

• Your personal data are no longer necessary for the purposes for which they were collected or otherwise processed

- you have revoked your consent to processing
- you used the right to object and the operator complied
- Your personal data is processed illegally
- this is the operator's legal obligation to delete your data
- Your personal data was collected in connection with the information company's service offerf)

<sup>&</sup>lt;sup>2</sup> Art. 17 par. 3 of the GDPR regulates exceptions to this right.

d) Right to restriction of processing

you have the right to ask the Operator to limit the processing of your data,  $_{3}$ 

• if you have challenged the correctness of personal data with the operator

• if the processing carried out by the operator is illegal and instead of deletion, you request a restriction of their use

• if the operator no longer needs the personal data, but you need it to prove, exercise or defend legal claims

• if you have exercised the right to object and personal data is processed on a legal basis, which is public interest or legitimate interest

Processing is limited for a certain necessary period, which depends on the specific situation, e.g. until the operator verifies the correctness

e) The right to data portability

you have the right to obtain your personal data from the Operator and to transfer them to another operator provided that the following conditions are met:

- processing is based on consent or contract and
- processing is carried out by automated means

The requested personal data should relate to the person concerned and should be data provided by this person, the exercise of this right should not have an adverse effect on the rights and freedoms of third parties.

As part of this right, you can:

• get your personal data from the operator in a structured, commonly used and machine-readable format

• request direct provision of your data to another operator

f) The right to object

you have the right to object to the Operator in the following cases:

if your personal data is processed on a legal basis, which is public interest or legitimate interest
if there is profiling based on public interest or legitimate interest

g) The right not to be subject to automated individual decision-making, including profiling

you have the right not to be subject to a decision that is based solely on automated processing and has legal effects that concern you or similarly significantly affect you
based on express consent

h) The right to withdraw consent

• if the operator processes your personal data on the basis of consent/express consent, you have the right to revoke this consent at any time

i) The right to file a motion to initiate proceedings on personal data protection

• as a data subject, you have the right to submit a proposal to the Office for the Protection of Personal Data of the Slovak Republic to initiate proceedings on the protection of personal data

### Art. 9 Cookies

1. Our company's website also uses cookies. Cookies are small text files that are stored on your device (computer, tablet, smartphone) when you visit our website and contain information necessary for your device to communicate with our website.

2. The cookies that may be stored on your computer when you browse the website are cookies that are intended exclusively to facilitate electronic communication, or they are cookies that are necessary to provide the service you request (cookies related to language, login cookies, etc.), or cookies with statistical data or other cookies in accordance with the conditions below.

3. If cookies require your consent before they can be stored, we ask you for this consent through the "learn more" link displayed on the first page of the website you reach, where it is clearly stated that by being in to continue browsing the website, you agree to the use of cookies.

## Art. 10 Sending e-mails

By entering into a contractual relationship between the data subject and the Operator, the operator has the right to use the data subject's personal data also for the purpose of contacting the data subject for the purpose of sending information in email form (in particular, instructions on the data subject's further obligations, marketing information, etc.). The legal basis for the processing of personal data is Act No. 452/2021 Coll. on electronic communications as amended.

### Art. 11 Changes to the terms of personal data protection

The protection of personal data for the Operator is not a one-time matter. The information that the Operator is obliged to provide to you may change or cease to be up-to-date. For this reason, the Operator reserves the right to modify and change these conditions at any time to any extent. In the event of a substantial change to these conditions, the Operator will notify you of this change, e.g. by a general announcement on this website or a special announcement via e-mail.

Effective January 16, 2024