

Information on the Processing and Protection of Personal Data

Notice on the Protection of Personal Data

Proper processing of your personal data is just as much a priority for us as the proper provision of our services. This document will provide you with information primarily on how we handle your personal data, what rights you have in connection with the processing of your personal data, as well as other information relating to the processing of personal data.

I. About us – controller of personal data and how to contact us

The controller of personal data is the company OLNEL s. r. o., Company ID (IČO): 54599342, Tax ID (DIČ): 2121737497, with its registered office at Obchodná 559/37, 811 06 Bratislava - Staré Mesto, registered in the Commercial Register of the Municipal Court Bratislava III, section: Sro, insert no.: 180723/B (hereinafter also the "Controller").

The Controller is also the operator of the website olnel.sk.

If you have any question regarding the processing of your personal data, you may contact us directly by phone at: +421 948 102 614, in writing at the e-mail address oleg@olnel.sk, or at the address of the Controller's registered office stated above.

Your data will be stored on secured IT devices. Access to your data is limited only to the Controller and those employees and collaborators who need to know this data for the purpose of contacting you back, for the purpose of handling your request, and for the purpose of enabling performance of the contract concluded between us, respectively the provision of the services requested by you, or to whom the obligation to become acquainted with your personal data is imposed directly by applicable legislation.

II. Personal data that we process

We process only such personal data as is necessary to provide you with professional services, whereby the scope of personal data is determined by generally binding legal regulations. If we process your data on the basis of your consent, the list, respectively the scope, of the data is stated directly in the consent.

We process in particular the following categories of personal data:

a.) Identification and contact data: in particular name, surname, residential address, correspondence address, contact telephone number, e-mail address.

If a legal act is performed on the basis of a power of attorney, the Controller also processes the personal data of the authorized representative, to an appropriate extent as in the case of an individual client. The same applies to the case of representation by a legal guardian in the case of a legal act of a child, in which case the personal data of this legal guardian is also processed. The purpose of this processing is in particular the identification and verification of the identity of clients and their representatives, the conclusion of contractual relationships, and the performance of contracts and obligations.

b.) Geolocation data: IP addresses

c.) Transaction data: bank connection IBAN (in the event that payments take place between us in cases of conclusion of a paid contract or provision of a paid service)

d.) Records of electronic communication and other interaction with you: records for the purpose of improving quality

III. Purposes for which we process your personal data and the legal basis for the processing of personal data

We process your personal data in accordance with the principle of data minimization, to the extent necessary, whereby most processing is justified by the fact that we need this data to contact you back in the event you submit your inquiry via the contact form on our website, to sell our products and services in connection with handling your purchase of our products and services.

Legal basis: The Controller obtains and processes the provided personal data as a controller in accordance with Article 6 of the GDPR and § 13 of Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments to Certain Acts, as amended (hereinafter the "PPDA"), as well as in accordance with the wording of special laws.

Purposes of processing based on the legal basis set out in Art. 6(1)(b) GDPR, § 13(1)(b) PPDA

"the processing of personal data is necessary for the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject prior to entering into a contract"

The Controller is entitled, without the client's consent, to process his/her personal data if this is necessary in pre-contractual relations in order to take measures prior to the conclusion of a contract at the request of the data subject. At the same time, in connection with the conclusion of a contractual relationship or the execution of a transaction, the Controller is entitled to obtain personal data by copying, scanning, or otherwise recording it from an identity document, on the basis of special laws. Without this data, we would not be able to conclude a contract with you and fulfil the obligations and rights arising therefrom.

Refusal to provide personal data within the meaning of this legal basis may result in the non-conclusion of the contract and the impossibility of providing the service or product, respectively other consequences established by legal regulations.

Purposes of processing based on the legal basis set out in Art. 6(1)(c) GDPR, § 13(1)(c) PPDA

"the processing of personal data is necessary for compliance with a legal obligation of the Controller"

The Controller may also process personal data on the basis of a directly applicable, legally binding act of the European Union, an international treaty by which the Slovak Republic is bound, further on the basis of the provisions of a special law, or on the basis of the client's consent, as a data subject, to the processing of his/her personal data.

In order for us to fulfil our legal obligations, you are obliged to provide us with the required information and documents, as well as to notify us of any changes. Without this data and documents, we cannot provide you with the requested services.

Purpose of processing based on the legal basis set out in Art. 6(1)(f) GDPR, § 13(1)(f) PPDA

“the processing of personal data is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or rights of the data subject requiring protection of personal data”

The Controller's legitimate interest is, for example, to contact you back after you have left your contact details, to inform you of information related to the service provided, to offer you services and products (marketing activities), the defence of legal claims, litigation and out-of-court debt recovery, statistical purposes, internal reporting, and the like.

Prior to processing personal data on this legal basis, the Controller takes into account whether its legal interests do not outweigh the interests and rights of the data subject, respectively whether they are in balance, whether its intention is legitimate, and whether processing on this legal basis is necessary. The Controller further takes into account the reasonable expectations of data subjects, i.e., whether they can expect the processing of personal data by the Controller.

If there is no direct contractual relationship between the Controller and the data subject, the Controller will process personal data for the period necessary, while the legal preconditions of legitimate interest are met, respectively for a maximum period of 1 year from the day of processing the personal data, or until the data subject exercises his/her right to object to such processing of personal data, whichever occurs first.

Processing within the meaning of this point does not require the consent of the data subject. The data subject has the right to object to such processing, with the consequence of restricting the processing by the Controller, respectively, in the case of marketing, an objection means the termination of the processing of personal data for this purpose.

Purpose of processing based on the legal basis set out in Art. 6(1)(a) GDPR, § 13(1)(a) PPDA

“the data subject has given consent to the processing of his or her personal data for one or more specific purposes”

If the client's personal data is not processed on the basis of the above-mentioned reasons, we process personal data on the basis of your consent, to the extent and for the purpose stated in the consent. The consent given is voluntary and may be withdrawn at any time. Withdrawal of consent does not affect the lawfulness of the data processed prior to its withdrawal. The processing period is stated directly in the consent.

IV. The period during which we process your personal data

We retain your personal data for the duration of your contract, respectively for the duration of the provision of services. After the termination of the contractual relationship and the settlement of all obligations arising from or related to the contract, we retain your personal data for the period necessary, namely for up to 3 years, and further for the period during which the Controller is obliged to retain personal data pursuant to generally binding legal regulations, or for the period for which consent to processing was given. In other cases, the processing period follows from the purpose of processing, or is set by legal regulations in the field of personal data protection. When contacting you back, we retain personal data for the period necessary to contact you back, respectively to properly handle your inquiry.

The period of retention of personal data follows in particular from special laws.

V. Sources from which personal data originate

We obtain personal data directly from you, e.g., data that you state in an order, when filling in the contact form, or by e-mail, in a power of attorney.

VI. Where your personal data travels

We provide your personal data to third parties, respectively recipients, if such an obligation is imposed on us by a special law, a directly applicable legally binding act of the European Union, or an international treaty by which the Slovak Republic is bound, or you have given your consent to such action, or they are our processors.

a.) Processors

In connection with our business activities, the Controller uses the services of contractual partners. We have concluded a personal data processing agreement with such entities (respectively it is the content of another agreement), within which the obligation of material and technical security on their part is established, including compliance with personal data protection rules, respectively possible sanctions for their breach. Processors are obliged to inform us without delay of any breaches of the security of the personal data processed. These are in particular IT companies, law firms, and consulting companies.

Companies providing IT services
Companies participating in payment processing
Companies providing e-mail and hosting services
Companies providing accounting services

b.) Third parties

Your personal data may be provided to third parties, respectively recipients, if such an obligation is imposed on us by a special law, a directly applicable legally binding act of the European Union, or an international treaty by which the Slovak Republic is bound, or you have given your consent to such action.

Third parties are:

- Public administration bodies and state institutions: e.g., state administration bodies, law enforcement authorities, courts, bailiffs, bankruptcy trustees, notaries, liquidators, supervisory authorities – the Office for Personal Data Protection, the Office for the Regulation of Electronic Communications and Postal Services, the Supreme Audit Office (NKÚ), the Financial Administration of the SR, the Ministry of Finance of the SR, the Social Insurance Agency, and the like,
- Institutions providing financial services and credit institutions for the purpose of carrying out the contractual relationship with you: e.g., banks and branches of foreign banks, respectively securities dealers, and the like.

c.) Cross-border transfer of personal data

In connection with the fact that we operate only within the territory of the Slovak Republic, cross-border transfer is possible only if the above-mentioned processors have their registered office outside the territory of the Slovak Republic; any cross-border transfer of personal data is defined by the personal data processing conditions of the respective controllers.

VII. Rights you have in connection with the processing of personal data

When processing your personal data, you may exercise the following rights:

a.) Information on the processing of personal data

The content of the information includes in particular the identity and contact details of the Controller, respectively the processor, its representative and, where applicable, the data protection officer, the categories of personal data concerned, the purposes of processing and the legal basis for processing, information on the rights of data subjects, the recipient or categories of recipients of personal data, information on the transfer of personal data to third countries, the period of retention of personal data, the authority of controllers, respectively processors, the possibility of contacting the Office for Personal Data Protection, the source of the personal data processed, and information on the existence of automated decision-making and profiling.

b.) Request access to personal data

You have the right to request whether personal data concerning you is or is not being processed and, if so, you have the right to obtain access to this personal data as well as information on the purposes of processing, the categories of personal data concerned, the recipients or categories of recipients, the period of retention of personal data or the criteria for determining it, the existence of the right to request from the Controller, respectively the processor, the correction of personal data or its erasure or restriction of processing, or the right to object to such processing, the right to lodge a complaint with the Office for Personal Data Protection, information on the source of the personal data, information on whether automated decision-making and profiling takes place, and information and safeguards in the event of the transfer of personal data to a third country or international organization. You have the right to be provided with copies of the personal data being processed. We are entitled to charge a reasonable fee for administrative costs for any further copies you request.

c.) Right to rectification

You have the right to have us correct inaccurate or outdated personal data and complete incomplete personal data. Therefore, if you have changed, for example, your contact details, please inform us and we will correct your personal data.

At the same time, we are obliged to keep accurate and up-to-date data on you. It is therefore important that you inform us without delay of any change to your data and provide us with documentary evidence of the relevant changes.

d.) Right to erasure (the “right to be forgotten”)

In certain cases established by legal regulations, we are obliged, at your instruction, to erase your personal data.

In such a case, we are obliged to assess whether the conditions required by legal regulations for erasure are met, since in some cases established by legal regulations, we are obliged to store and archive your data for the period established by law.

e.) Right to restriction of processing

In cases established by law, you have the right to request that we process personal data exclusively for the most necessary legal reasons or block the personal data.

f.) Right to data portability

You have the right to request that we provide your personal data to another controller, another company, where this is technically possible. If no legal or other significant obstacles prevent us from doing so, we will transfer your personal data in a corresponding format to a third party designated by you.

g.) Right to object to the processing of data, automated individual decision-making (including profiling)

If you believe that we are processing your personal data in violation of legal regulations, please contact us; we will be happy to provide you with an explanation, or make the necessary correction, if applicable. You have the right to object to the processing of your data for direct marketing purposes. You may also raise an objection directly against automated decision-making, including profiling, insofar as this is permitted by applicable legislation.

h.) Right to lodge a complaint

You may at any time contact the supervisory authority with your suggestion or complaint regarding the processing of personal data, which is the Office for Personal Data Protection of the Slovak Republic, with its registered office at Hraničná 12, 820 07 Bratislava 27.

i.) Contact details for exercising your rights against the Controller

You may exercise your rights against the Controller regarding the processing of your personal data either directly by phone at +421948102614 or in writing at the e-mail address oleg@olnel.sk, or at the address of the place of business of the Controller's foreign person's enterprise within the meaning of the ŽRSR (Trade Licensing Register of the SR). We will provide you with a response as soon

as possible, but no later than within one month of receipt of the request. This period may, if necessary, be extended by a further two months, taking into account the complexity and number of requests. We will inform you of any extension, including the reasons for it.

VIII. Right to withdraw consent to the processing of personal data

Consent to the processing of personal data is based on the principle of voluntariness and you may withdraw it at any time. Withdrawal of consent does not affect the lawfulness of the data processed prior to its withdrawal.

You may withdraw your consent by phone at +421948102614 or in writing at the e-mail address oleg@olnel.sk, or at the address of the place of business of the Controller's foreign person's enterprise within the meaning of the ŽRSR. Please state in the withdrawal of consent:

- who is submitting the withdrawal, including in particular name, surname, residential address, so that we can identify you.

Only the processing of personal data that the Controller processes on the basis of consent can be withdrawn, respectively restricted, i.e. not where the processing of personal data is a necessary precondition for the performance of a contract to which the data subject is party, respectively not where the processing of personal data by the Controller arises from special laws.

IX. Existence of automated decision-making and profiling

In connection with contacting you back, handling your inquiry, or the conclusion and existence of a business relationship in general, we generally do not use automated individual decision-making or profiling. If we use such decision-making/profiling in individual cases, we will inform you thereof to the extent required of us by the relevant legal regulations.