

Overview of Personal Data Processing for Employees (including individuals in a similar employment relationship)

according to Regulation (EU) 2016/679 of the European Parliament and the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the "GDPR Regulation") and Act No. 18/2018 Coll. on the protection of personal data and amending and supplementing certain Acts (hereinafter referred to as the "Data Protection Act").

The aim of this overview is to provide you with basic information about the processing of your personal data if you are performing work for us based on an employment contract or a similar employment relationship.

Complete information is available upon request by the controller.

Identification and contact details

The controller processing your personal data is msg life Slovakia s. r. o., Hraničná 18, 821 05 Bratislava, Company ID: 35800780 (hereinafter referred to as the "Controller").

In case of any ambiguities, questions regarding the processing of your personal data, suggestions, or complaints if you believe that we process your personal data unlawfully or unfairly, or to exercise any of your rights, you can contact us at any time by sending an email to: gdpr.sk@msg.group, or in writing to the address of the Controller.

Contact details of the Data Protection Officer supervising the processing of personal data: email: dpo3@proenergy.sk.

Basic overview of processing activities

We may process your personal data within the following processing activities (filling systems - FS):

Name and description of processing activity – purpose and legal basis, other important facts	Categories of data subjects	Categories of personal data	Retention period	Categories of recipients (external)
Human Resources and Payroll (HR&P) - we process your personal data for the purpose of managing personnel and payroll records, in compliance with legal obligations of the employer and obligations related to the employment contract or similar employment relationship, including pre-contractual relationships, contract negotiations, or with your voluntary consent, or in the exercise of the legitimate interests of the data controller or a third party in connection with: a. processing contact details for the purpose of fulfilling work	job applicants, employees, former employees (including individuals in a similar employment relationship), depending on the nature of the processing operation, personal data may also pertain to spouses of employees, dependent children of employees, parents of	the various HR&P agendas contain personal data (including sensitive personal data, particularly concerning health) that are relevant to the work the employee is expected to perform, is performing, or has performed.	For the duration necessary to fulfill the purpose, in accordance with the Archives and Records Management Act (but no longer than 70 years from the date of birth in the case of employee personal files).	(1) institutions and organizations, contractual partners, to whom processing is permitted by specific legal regulations, including government authorities and public bodies for the purpose of oversight and supervision, (2) processors, (4) contractual partners for whom provision

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duties and ensuring crisis management and business continuity management (FS 1.10, 1.11), e. sharing data within the corporate group for internal administrative purposes (primarily for maintaining internal records, contacting, collaborating, training, and approving compensation/benefits) (FS 1.22).	dependent children of employees, employees' parents, and close relatives.			is required to fulfill a contract between the data subjects and the data controller, (5) Personal data may, in certain cases, be shared based on legitimate interests, (3) If you have given us voluntary consent or instructed us to provide the data, your personal data may also be shared with other recipients.
Management of Registry (and Correspondence) – we may process your personal data in accordance with the legal obligation for the purposes of managing the registry and recording mail. The processing of data from correspondence may be carried out within the scope of fulfilling a contractual relationship, or a pre-contractual relationship (negotiating a contract, fulfilling a contract, maintaining accounting records, handling complaints, etc.), fulfilling a legal obligation (e.g., whistleblowing, handling requests from concerned individuals, managing the registry), or within the scope of legitimate interest (e.g., handling complaints, maintaining records of business partners, processing	natural persons – senders and recipients of correspondence.	• personal data (regular identification details such as title, name, surname, signature, address, email address, phone number, and other data of varying sensitivity as per Act No. 305/2013 Coll., or voluntarily provided within the scope of communication).	• up to 10 years (records register), • handling of routine and official correspondence for 5 years.	(1) Ministry of Interior of the Slovak Republic, another authorized entity.

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unexpected/unrequested communications).				
Whistleblowing - we may process your personal data if you submit a non-anonymous report of potential wrongdoing or if you are the subject or participant in an investigation of potential wrongdoing according to a specific legal regulation.	Natural persons who reported wrongdoing or requested protection when reporting serious wrongdoing (or their close persons for whom protection is requested), and individuals being investigated based on the report.	• personal data provided in the report and data necessary for its investigation (mainly common identification data about the whistleblower, persons involved in the wrongdoing, details of the report which may contain various sensitive information).	3 years (from the receipt of the report).	(1) Office for the Protection of Whistleblowers, participants in the proceedings, other competent administrative authorities, Police Force of the Slovak Republic, Prosecutor's Office of the Slovak Republic, courts of the Slovak Republic, other authorized entities.
Promotion - we may process your photos, videos, reviews about us, and other information about you only to the extent and manner you have consented to. If we determined that consent is unnecessary (excessive effort, etc.) for a given purpose, such as participating in events organized by the Controller, we may process photos or other records in our legitimate interest for positive promotion, documentation, and presentation of the Controller's activities. If you do not want your photos, videos, or other related data to be used for documentation or promotional purposes, you can exercise your rights (object to processing or withdraw	Employees (including those in similar labor-law relationships), other natural persons.	Personal data (common - mainly identification data, captured in photos, videos/audio recordings, other related personal attributes).	Duration of the employment relationship or until the purpose ends (5 years); does not apply to documents/records with permanent documentary value under the Archives and Records Act.	(1) Other authorized entities.

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consent) using the contacts provided at the beginning of this information.				
Technical and organizational measures - to ensure your and our safety (including your personal data), demonstrate compliance with our legal obligations, and defend, apply, or protect our legal claims or third-party claims, we may process records with your personal data. This may include: -records of your consent to data processing. -records of fulfilling our information obligation towards you. -records of handling your request. -records of allowed/assigned accesses and assets and their use if granted to you. -records necessary for investigating security incidents and data protection violations. -records (confirmations) if you have been trained. -records if you committed to confidentiality. -records if you were part of our control activities or audit, -other records related to the implementation of technical and organizational measures.	Employees, data protection officers, applicants for the exercise of rights, persons against whom the Controller fulfills obligations under the GDPR, persons involved or addressed in security incidents, processors, other external entities (e.g., if invited to address the issue - consultants, auditors, lawyers), employees of authorities under specific legal regulations (e.g., employees of the supervisory authority in consulting,	• personal data (common - identification, contact data, which may be supplemented by other necessary data of various natures depending on the issue - e.g., login data, user/culprit behavior data such as login, logout logs, actions, data necessary to verify the identity of the person requesting to exercise rights, data showing violations of internal regulations such as bypassing security settings, etc.).	According to the chapter "record keeping, archiving" of the Data Protection Policy and the Personal Data Security Policy (most records are kept for 3 years or less, records of deletion or containing contracts for 5 years, some records permanently, e.g., related to handling security incidents, impact assessments, informing data subjects, etc.).	1a,5) Data protection officer, Authority for personal data protection of the Slovak Republic, (1b,5) Police, Prosecutor's office of the Slovak Republic, courts of the Slovak Republic, (1c) other authorized entities.

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Processing is in the legitimate interest of the Controller and also an obligation under the GDPR Regulation. Records may be used to hold you accountable and as evidence to demonstrate, apply, or defend the legal claims of the Controller or a third party (mainly in relation to security threats or breaches, including protection of life and health, property, financial or property damage, business interruption, reputational damage, know-how leakage, etc.).	control activities, etc.).			

Data from some of the above-mentioned processing operations may be used, where applicable and to the necessary extent, to prove, enforce, or defend our legal claims, or the legal claims of third parties (for example, providing data to law enforcement authorities, executors, lawyers, etc.), within judicial or extrajudicial proceedings, debt collection, etc. Some obtained personal data (e.g., confirmations, records, other documents confirming a particular fact, etc.) may be retained and used as "evidence" for audit purposes, third-party control activities, or for verifying the proper fulfillment of the Controller's obligations under legislative requirements or other requirements (contractual, sectoral, etc.).

Your rights

As a data subject whose personal data we process, you have the following rights under the GDPR Regulation and the Data Protection Act in connection with the processing of personal data: the right to request access to your personal data being processed, the right to correct (or supplement) personal data, the right to erasure or rectification personal data processing, the right to object to the processing of personal data, the right to the ineffectiveness of automated individual decision-making, including profiling, the right to data portability, the right to withdraw consent to the processing of personal data. If you decide to exercise any of your rights, you can use our request form available in the complete information on the processing of your personal data. If you are not satisfied with our response or believe that we have violated your rights or process your personal data unfairly or unlawfully, you have the right to file a complaint with the supervisory authority, which is the Authority of data protection of the Slovak Republic.