

1. Introduction

This Privacy Policy applies to Personal Data processed by Levrak s.r.o., with its registered office in Bratislava, Plynárska 1, postal code 821 09, Slovak Republic, Company ID No.: 54 617 952, registered in the Commercial Register maintained by the Municipal Court Bratislava III, Section: Sro, Insert No.: 161010/B (hereinafter also referred to as the "**Controller**" or "**Levrak**"). Any questions, suggestions, requests or complaints can be sent electronically to: office@konfrero.com or by post to the address of our registered office.

This Personal Data Processing Policy applies to (i) the processing of Personal Data provided when using the [www.konfrero.eu website](http://www.konfrero.eu) (hereinafter also referred to as the "**Site**"), (ii) the processing of Personal Data in the context of electronic communication or telephone communication, (iii) the processing of Personal Data in the context of supplier and customer relationships, (iv) the processing of Personal Data in the performance of our obligations, and (v) the processing of Personal Data for the purpose of protecting our legitimate interests.

We approach the processing of Personal Data with the highest degree of care, maintaining the best standards of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage minimization, integrity and confidentiality and accountability. When processing your Personal Data, we proceed in accordance with the GDPR, the Personal Data Protection Act and the Accounting Act.

2. Definitions

Abbreviations used in this document with a capital letter have the following meanings:

Code of Civil Litigation means Act No. 160/2015 Coll., the Code of Civil Litigation, as amended

Civil Non-Contentious Code means Act No. 161/2015 Coll., Civil Non-Contentious Code, as amended;

GDPR means 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 (General Data Protection Regulation)

We in any form means the Controller, Levrak

Commercial Code means Act No. 513/1991 Coll., the Commercial Code, as amended

Civil Code means Act No. 40/1964 Coll., the Civil Code, as amended

Personal data is any information relating to an identified or identifiable natural person

Code of Administrative Procedure means Act No. 71/1967 Coll., on Administrative Procedure (Code of Administrative Procedure), as amended

Code of Administrative Procedure means Act No. 162/2015 Coll., the Code of Administrative Procedure, as amended

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Code of Criminal Procedure means Act No. 301/2005 Coll., Code of Criminal Procedure, as amended;

Criminal Code means Act No. 300/2005 Coll., the Criminal Code, as amended;

Act on Minor Offences means Act No. 372/1990 Coll., on Minor Offences, as amended

You in any form means a data subject within the meaning of the GDPR

Electronic Communications Act means Act No. 452/2021 Coll., on Electronic Communications, as amended

The e-Government Act means Act No. 305/2013 Coll., on the electronic form of the exercise of the powers of public authorities and on the amendment of certain acts (the e-Government Act)

The Rental Act means Act No. 116/1990 Coll. on the Lease and Sublease of Non-Residential Premises, as amended;

Act on Protection against Legalization means Act No. 297/2008 Coll. on Protection against Legalization of Proceeds of Crime and on Protection against Terrorist Financing and on Amendments to Certain Acts, as amended;

Consumer Protection Act means Act No. 250/2007 Coll. on Consumer Protection and on the amendment of Act No. 372/1990 Coll. of the Slovak National Council on Minor Offences, as amended.

Act on Whistleblowing means Act No. 54/2019 Coll., on the Protection of Whistleblowers and on Amendments to Certain Acts, as amended

Act on the Register of Public Sector Partners means Act No. 315/2016 Coll. on the Register of Public Sector Partners, as amended;

Advertising Act means Act No. 147/2001 Coll. on Advertising and on Amendments to Certain Acts;

Personal Data Protection Act means Act No. 18/2018 Coll., on the Protection of Personal Data and on the Amendment of Certain Acts, as amended

Act on Minor Offences means Act No. 372/1990 Coll., on Minor Offences, as amended

Labour Code means Act No. 311/2001 Coll., the Labour Code, as amended;

Accounting Act means Act No. 431/2002 Coll., on Accounting, as amended.

3. Identification and contact details

Levrak s.r.o.

with its registered office in Bratislava, Plynárska 1, postal code 821 09, Slovak Republic
Company ID: 54 617 952

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registered in the Commercial Register maintained by the Municipal Court Bratislava III,
Section: Sro, Insert No.: 161010/B

E-mail: office@konfrero.com

tel. +421 0948 209 013

4. Reasons for the processing of Personal Data

The processing of Personal Data is necessary on our part in particular in order to be able to:

- a) to provide accounting and advisory services to our clients;
- b) to comply with various legal and contractual obligations; and
- c) protect the legitimate interests of us, our clients and other persons

The purposes of the processing are set out below.

5. Categories of Personal Data Processed

5.1. We process only such Personal Data that we need to fulfil the Purposes of their processing. We process the following categories of Personal Data:

Category	Personal data
Identification data	Data that allow direct identification, in particular first name, last name, date of birth, social security number
Contact details	Data that is necessary for communication with you, in particular. Telephone number, address, email address, profiles on online platforms
Payment details	Data that is necessary to process payments to us or to you, in particular. account number, financial institution identification, variable symbols and other accompanying payment data
Profile data	Data related to the performance of a contract for the provision of bookkeeping services or other services, in particular age, gender, employment, income, marital status
Sensitive data	Personal data of special categories, in particular data on health, political opinions, data relating to criminal convictions and misdemeanours
Personal data created by us	In particular, our internal client labels

6. Source of Personal Data

6.1. If you are our client, we most often collect your Personal Data directly from you. We may also obtain personal data about our clients from publicly available sources, from public authorities or from other persons.

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6.2. If you are not our client, we most often obtain your Personal Data from our clients or from other public or statutory sources, by requesting from public authorities, extracts from public registers.

7. Purposes of processing, legal basis for processing

Purposes of processing	Legal basis for processing	Relevant legislation
Provision of accounting and other services	Fulfilment of a legal obligation pursuant to Article 6(1)(c) of the GDPR, performance of a contract pursuant to Article 6(1)(b) of the GDPR or legitimate interest pursuant to Article 6(1)(f) of the GDPR	Accounting Act, Civil Code and Commercial Code
Performance of a contract other than a contract for the provision of accounting and other services	Fulfilment of a legal obligation pursuant to Article 6(1)(c) of the GDPR, performance of a contract pursuant to Article 6(1)(b) of the GDPR or legitimate interest pursuant to Article 6(1)(f) of the GDPR	The Civil Code and the Commercial Code
Protection of property, rights and legally protected interests	Legitimate interest pursuant to Article 6(1)(f) of the GDPR	GDPR, Civil Code and Commercial Code, Code of Criminal Procedure, Criminal Code, Code of Civil Procedure, Code of Civil Non-Contentious Procedure, Code of Administrative Procedure, Code of Administrative Procedure, Code of Administrative Procedure, Act on Minor Offences
Marketing Purposes	Consent of the data subject pursuant to Article 6(1)(a) of the GDPR or legitimate interest pursuant to Article 6(1)(f) of the GDPR	Electronic Communications Act, Advertising Act, Consumer Protection Act, Civil Code
Accounting & Tax Purposes	Fulfilment of a legal obligation pursuant to Article 6(1)(c) of the GDPR	Accounting Act, special laws in the field of accounting and tax administration
Register of job seekers	Consent of the data subject pursuant to Article 6(1)(a) of the GDPR	Labour Code, other special regulations

8. Legitimate interests of the Controller

8.1. On the basis of a legitimate interest, Personal Data may be processed only if your interests or fundamental rights and freedoms do not prevail over the legitimate interests pursued by us. The purposes of processing Personal Data on the basis of our legitimate interest are:

- a) Protecting our rights and legally protected interests;

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- b) To protect our property;
- c) Direct marketing;
- d) Administration of clients and business partners.

8.2. In the case of processing of Personal Data carried out on the basis of the protection of our legitimate interests, you have the right to object to the processing of Personal Data on grounds relating to your particular situation. Your objections will always be considered with regard to the reason for their submission.

8.3. If you object to the processing of Personal Data for direct marketing purposes, your objection will be complied with without further ado and the processing of Personal Data for this purpose will be terminated. This may be without prejudice to further processing of Personal Data for another purpose and under a different legal basis.

9. Recipients or categories of recipients of Personal Data

9.1. We disclose the personal data of our clients and other natural persons only to the extent necessary and always with the confidentiality of the recipient of the data, e.g. to our employees, persons whom we entrust with the performance of individual acts in the provision of accounting and other services, representative lawyers, IT service providers (as intermediaries), interpreters and translators (as intermediaries), or providers of software equipment or support for our office, including employees these persons.

9.2. We are obliged to prevent the commission of a crime, to report the committed crime, and we are also obliged to report information in the field of prevention of money laundering and terrorist financing.

10. Transfer of Personal Data and Automated Processing

10.1. We do not intend to transfer your Personal Data across borders to third countries outside the European Economic Area (EU, Iceland, Norway and Liechtenstein). We use secure cloud services from a verified provider with servers located in EU jurisdiction.

10.2. No automated decision-making or profiling will be carried out in relation to your Personal Data.

11. Personal Data Retention Period

11.1. We process and store Personal Data for the period necessary to achieve the Purposes of Processing and for the period during which we are obliged to process Personal Data in accordance with legal regulations.

11.2. The periods of processing of Personal Data are determined depending on the purposes of the processing:

Purpose of processing	Processing period
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Provision of accounting and other services	For the duration of the contract and 10 years after the end of the specific contract
Performance of a contract other than a contract for the provision of accounting and other services	For the duration of the contract and 10 years after the end of the specific contract
Protection of property, rights and legally protected interests	Unless otherwise provided by law, for a period of 10 years or unless there is a need to store the data for a longer period in connection with a specific case in a justified case
Marketing Purposes	For the period of consent granted until its revocation and/or For the duration of our Legitimate Interest
Accounting & Tax Purposes	For the period laid down by law
Register of job seekers	For the duration of the selection procedure and, if consent has been granted, for the duration of the consent

12. Obligation to provide Personal Data

12.1. In general, you are not obliged to provide us with Personal Data and their provision is voluntary. Depending on the specific situation and our obligations under the law, failure to provide Personal Data may make it impossible for us to start or continue providing the service or performing the contract.

13. Rights of the data subject

13.1. **THE RIGHT TO WITHDRAW CONSENT TO THE PROCESSING OF PERSONAL DATA. IN THE EVENT THAT YOUR PERSONAL DATA IS PROCESSED ON THE BASIS OF YOUR CONSENT, YOU HAVE THE RIGHT TO WITHDRAW THIS CONSENT AT ANY TIME. THE WITHDRAWAL OF CONSENT WILL NOT AFFECT THE LAWFULNESS OF THE PROCESSING OF YOUR DATA ON THE BASIS OF THIS CONSENT BEFORE ITS WITHDRAWAL. HOWEVER, THIS REVOCATION DOES NOT AFFECT FURTHER PROCESSING OF YOUR PERSONAL DATA THAT IS JUSTIFIED ON ANOTHER LEGAL BASIS, SUCH AS THE PERFORMANCE OF A CONTRACT.**

THE DATA SUBJECT MAY WITHDRAW CONSENT TO THE PROCESSING OF PERSONAL DATA, FOR EXAMPLE, BY SENDING A MESSAGE TO OFFICE@KONFRERO.COM.

13.2. **Right to information and access to Personal Data.** You have the right to obtain confirmation as to whether your Personal Data is being processed and the right to access this Personal Data and information about the following:

- a) for what purpose we process Personal Data;
- b) what categories of Personal Data are processed;

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- c) to whom the Personal Data has been or will be disclosed;
- d) how long the Personal Data will be retained;
- e) that you have the right to request rectification, erasure and restriction of the processing of your Personal Data and the right to object to such processing;
- f) that you have the right to lodge a complaint with a supervisory authority;
- g) where we get the Personal Data from;
- h) whether your Personal Data is used in automated decision-making, including profiling, and the details of the procedure and the consequences of such processing for you.
- i) what security guarantees you have if Personal Data is transferred to a third country (outside the EU) or to an international organization.

13.3. **The right to rectification.** You have the right to promptly rectify incorrect Personal Data. If the Personal Data is incomplete, you may complete it by providing an additional statement.

13.4. **Right to erasure.** You have the right to request the erasure of your Personal Data if:

- a) they are no longer necessary for the purposes for which they were collected or otherwise processed, or
- b) if you withdraw your consent and another basis for the processing no longer exists;
- c) if you object to the processing, but the legitimate reasons for the processing do not prevail;
- d) if the Personal Data has been unlawfully processed;
- e) if the Personal Data must be erased by law,

13.5. **Right to restriction of processing.** You have the right to request the restriction of the processing of your Personal Data in the following cases:

- a) If you claim that Personal Data is incorrect;
- b) If you do not explicitly request erasure in the case of unlawful processing and at the same time request the restriction of the use of Personal Data;
- c) If we no longer need to process the Personal Data, but you need it;
- d) If you have objected to the processing and an assessment of our legitimate interest in further processing is underway.

If the processing is restricted, such measures will be taken to temporarily disable the Personal Data.

13.6. **Right to portability.** If we process Personal Data by automated means and if they are processed on the basis of your consent or for the performance of a contract, you may request that Personal Data be transferred directly to another controller.

13.7. **The right to object to the processing of personal data.** If your Personal Data is processed for direct marketing purposes, you have the right to object to its processing and if you do so, it will no longer be processed for direct marketing purposes. If Personal Data is processed for the performance of a task carried out in the public interest or in the exercise of public authority entrusted to us or on the basis of our legitimate interest, you have the right to object to their processing and we will not process Personal Data until our overriding legitimacy is demonstrated.

13.8. **Right to lodge a complaint.** You have the right to lodge a complaint against the processing of your Personal Data with a supervisory authority at any time.

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Competent authority for filing a complaint in the Slovak Republic: Office for Personal Data Protection of the Slovak Republic, with its registered office in Bratislava, Hraničná 12, postal code 820 07, Slovak Republic, www.dataprotection.gov.sk.

- 13.9. You can exercise your rights, for example, by sending a request to the e-mail address: office@konfrero.com or in paper to the address of our registered office: Bratislava, Plynárenská1, postal code 821 09. To make it easier, you can use the following form. You are not obliged to use the prescribed form.
- 13.10. If you exercise any of the above rights, you will be informed of the measures taken within one month of receipt of the request. We are entitled to extend this period by another two months, especially in the case of a complex application. You will be informed in advance of the extension of the deadline. In the event that we have reasonable doubts about your identity, we may ask you to provide additional information necessary to confirm your identity, for example by presenting an identity document.

14.Changes to the Privacy Policy

- 14.1. The protection of Personal Data is not a one-time matter. The information we are required to provide to you with respect to our processing of Personal Data may change or cease to be up-to-date. For this reason, we reserve the right to modify and amend these terms and conditions at any time. We will notify you in the event of a change to these terms and conditions.