

## OFTUM GTJ s.r.o., Lorinčík 102, 040 11 Košice

### **Personal Data Protection Privacy Policy**

At company OFTUM GTJ s.r.o., we understand information as important company assets managed in compliance with the strategy implemented, based on three fundamental pillars: **human resources, their knowledge and modern technology**. Applied system of privacy policy considers all requirements of maintaining dignity, integrity, and information availability.

#### **Principles of personal data protection policy**

1. Collecting the personal data, our company clearly, honestly and transparently informs on the nature of collected personal data and the purpose the company intends to use it for. Personal data using by the company that is other than the purpose declared originally has not been approved without provision of reasonable data by affected person and, if possible, the company must receive consent for personal data use specified in advance. The company is generally entitled to use the personal data for secondary purposes during implementation of internal regulations and audits, and for fulfillment of its legal obligations.
2. The company collects and processes personal data within the extent of conferred valid and informed consent or if it is required by legitimate corporate interests of the company, for example conclusion or fulfillment of contract, fulfillment of contract commitments and legal duties.
3. Any consent of an individual with personal data collecting and use shall be conferred voluntarily and based on company information on the intended data use. The individual can remove such consent conferred at any time without undue complications. The date, content and validity of such consent shall always be documented.
4. Processing personal data in the name of client or a third party, the company shall observe the GDPR related directives and instructions along with this privacy policy.
5. The company collects and keeps minimum volume of personal data required for specified initial purpose that the data is used for, and ensures that the kept personal data will always remain relevant and reasonable for the given purpose. The company shall keep the data in updated form and ensures their correction if required.
6. The company keeps personal data only for period of time necessary for specified purpose. Particular personal data keeping policies shall define the time that, if lapsed, shall require removal, destruction or treatment of such data as anonymous.
7. We respond to all requests or complaints of the individuals that relate to their personal data.
8. The company recognizes the right of an individual specified in the Directive dealing with affected persons' rights.
9. The company recognizes that certain personal data categories are sensitive and require higher protection level. Sensitive personal data include information on a person's health condition, biometric and genetic data, excerpt from Criminal Records and further information that is specifically protected by valid personal data protection acts.  
The company collects and processes such sensitive data only if it is required within one of the following circumstances:
  - a) an individual conferred express consent thereto,
  - b) use of such sensitive data is necessary for the company in order to observe the employment acts or other legal duties.

10. The company has implemented adequate procedures and ensured restricted access to sensitive data only to authorized persons, disabling unauthorized access, use and spread of such sensitive information.  
The company has implemented adequate measures aimed at ensuring confidence, integrity and accessibility of personal data and at avoiding the risk of unauthorized or illegal access, adjustment, destruction or disclosure of such data. These measures aimed at data protecting are based on assessment of effects, taking in account endangering of the individual in relation to particular personal data kept by the company. These measures include security and organizational measures adapted to the form of processing and the nature of personal data.
11. The company shall promptly inform the individuals on any disruption of personal data and report on such incident to competent authorities pursuant to valid legislation.
12. The company has restricted access to the personal data only to employees or suppliers that have to fulfill particular tasks associated with such personal data. They shall apply reasonable information extent, trainings and commitments of confidentiality aimed at ensuring that personal data shall not be shared nor disclosed towards unauthorized persons including any further company staff that doesn't need access to the personal data.

In Košice, dated May 25, 2018

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Prof. MUDr. Tomáš Juhás, DrSc.  
Executive Officer