

**DECLARATION ON THE PROCESSING OF PERSONAL DATA**  
**during processing operations associated with the website and career portal of DUNEA, a.s.**

**The company DUNEA, a.s.**, registered seat: Sasinkova 12, Bratislava 811 08, Company ID: 43 956 700, entry in the Commercial Register of District Court Bratislava I, section: Sro, 4407/B (hereinafter referred to only as “DUNEA, a.s.” or the “controller”) processes your personal data with the aim of helping you as a job seeker to find a suitable job. We process your personal data in line with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons in the processing of personal data and on free movement of such data, which repeals Directive 95/46/EC on the protection of personal data (hereinafter referred to as the “**GDPR**” or the “**Regulation**”) and Act No. 18/2018 Coll. on Personal Data Protection and on the amendment and supplementation of certain acts (hereinafter referred to as “**the Act**”).

DUNEA, a.s., together with other companies (hereinafter referred to as “**joint controllers**”), provides job seekers having an interest in finding a suitable employee with the opportunity to fill out an online form on the website of DUNEA, a.s., [www.dunea.sk](http://www.dunea.sk) and [www.kariera.dunea.sk](http://www.kariera.dunea.sk) (hereinafter referred to as the “**website**”) (1) to respond/express interest in a specific published job and/or (2) to register in the database of job seekers of the joint controllers.

The following companies are the **joint controllers**:

**AGROSUN, spol. s r.o.**, registered seat: Štúrova 1090/7, Dunajská Streda 929 01, Slovak Republic COMPANY ID: 36231193,

**Warcun, a. s.**, registered seat: Dvojrad 333, Vrakúň 930 25, Slovak Republic, COMPANY ID: 45 669 678,

**FK DAC 1904, a.s.**, registered seat: Štúrova 1090/7, Dunajská Streda 929 01, Slovak Republic, COMPANY ID: 36 233 846,

**DS OPERATOR, a.s.**, registered seat: Štúrova 1090/7, Dunajská Streda 929 01, Slovak Republic, COMPANY ID: 50 868 683,

**DS PROPERTY, a.s.**, registered seat: Povodská 169/14, Dunajská Streda 929 01, Slovak Republic, COMPANY ID: 47 490 608,

**EUROMILK, a.s.**, registered seat: Bratislavská 41, Veľký Meder 932 15, Slovak Republic, COMPANY ID: 36 241 873,

**ISTERMEAT a.s.**, registered seat: Povodská 14, Dunajská Streda 929 01, Slovak Republic, COMPANY ID: 36 232 157,

**Kukkonía s.r.o.**, registered seat: Štúrova 1090/7, Dunajská Streda 929 01, Slovak Republic, COMPANY ID: 50 868 683,

**LOAR-VE, a.s.**, registered seat: Jesenského 6, Dunajská Streda 929 01, Slovak Republic, COMPANY ID: 34 125 779,

**B.C.INVEST, a.s.**, registered seat: Štúrova 1090/7, Dunajská Streda 929 01, Slovak Republic, COMPANY ID: 36 232 645,

**SAGAX, s.r.o.**, registered seat: Hlavná 58A, Dunajská Streda 929 01, Slovak Republic, COMPANY ID: 36 244 589,

**LOAR, spol. s r.o.**, registered seat: Štúrova 1090/7, Dunajská Streda 929 01, Slovak Republic, COMPANY ID: 31 450 610,

**Media 2U, s. r. o.**, registered seat: Štúrova 1090/7, Dunajská Streda 929 01, Slovak Republic, COMPANY ID: 50 800 469.

The database of job seekers is a common database of the previously listed companies, which compile it together and process personal data in it as joint controllers. The cooperation among the joint controllers was declared in a written contract, which was concluded for an indefinite period and lays out the conditions of personal data processing between the joint controllers. The joint controllers have agreed on the following:

- the contact point for the data subject will be the company DUNEA, a.s., e-mail address: [ooou@istergroup.com](mailto:ooou@istergroup.com)
- the data subject may exercise his/her rights under the GDPR with each of the joint controllers and against each of the joint controllers,
- the obligations to provide information stated in Article 13 of the GDPR will be fulfilled by each of the joint controllers,
- the obligations and tasks associated with the exercise of the rights by data subjects will be carried out by DUNEA, a.s.

The purpose of processing personal data is the provision of assistance to the data subject, as a job seeker, to find a suitable job opportunity.

With the processing of personal data by the controller, the interested party or website visitor is the data subject, i.e. the person whose personal data are processed.

The personal data of the data subjects will be stored securely, in line with the security policy of the controllers and only for the time needed to satisfy the purpose of the processing. Access to personal data will exclusively be granted to persons authorised by the controller to process personal data, and they will process them based on the controller's instructions, in line with the controller's security policy.

We here describe in detail how we will use your personal data obtained directly from you when using our website.

	<b>Description and purpose of personal data processing</b>	<b>Legal basis for personal data processing</b>	<b>Scope and source of the personal data processed</b>	<b>Duration of personal data processing</b>	<b>Recipient of transferred personal data</b>
1.	<p><b>Contact forms of the website and career portal</b>            Contact forms (separate for the website and career portal) serve to ask questions, send comments, observations, claims, complaints or any other communication initiated by a visitor to the DUNEA, a.s., website. The purpose of processing personal data is to ensure mutual communication between website visitors and DUNEA, a.s., as well as to handle visitors' suggestions.</p>	<p>Article 6 par. 1 lett. a) GDPR (express consent of the data subject).            The provision of personal data for this purpose is not a legal or contractual requirement; however, without their processing it is not possible to properly process a request or other initiative of the data subject. Consent to the processing of personal data can be withdrawn at any time.</p>	<p>Name and surname, e-mail address            Data source: provided by the data subject</p>	<p>At most 3 years from the day of data provision. Civil claims can be recovered for the given period in line with Act No. 46/1964 Coll. Civil Code.</p>	<p><b>AGROSUN, spol. s r.o., Warcun, a. s., FK DAC 1904, a.s., DS OPERATOR, a.s., DS PROPERTY, a.s., EUROMILK, a.s., ISTERMEAT a.s., LOAR-VE, a.s., B.C.INVEST, a.s., SAGAX, s.r.o., LOAR, spol. s r.o., Media 2U, s. r. o.</b> are joint controllers; there are no other recipients for data transfer.</p>
2.	<p><b>Personal data in the database of job seekers</b>            Job seekers have the option to fill out an online form on the website            1. to respond/express interest in a specific published job            2. to register in the database of job seekers.            Personal data of applicants who responded to a specific position but were not successful will be included by the controller in the database of applicants. An applicant can request to be removed from the database at any time.            The purpose of processing personal data is the provision of assistance to the data subject, as a job seeker, to find a suitable job opportunity.</p>	<p>Article 6 par. 1 lett. b) GDPR (for the purpose of carrying out the selection of a suitable applicant on a legal basis, which is a contractual and pre-contractual relationship to which the data subject is one of the contractual parties, in conjunction with the Labour Code).            Failure to provide personal data necessary for the implementation of a suitable selection of the applicant may result in the failure to carry out the selection, the impossibility of assessing the applicant's abilities and qualities. Personal data may also be processed in the database of job seekers according to Art. 6 par. 1 lett. f) GDPR, i.e. a legitimate interest, in order to provide information (via e-mail) that one of the joint controllers has expressed interest in the CV of the person concerned stored in the applicant database.</p>	<p>Name and surname, e-mail, designation of work area/job position in which the job seeker is interested, attached CV, or other documents. Providing additional data in response to a job offer is at the sole discretion of the interested job seeker            Data source: provided by the data subject</p>	<p>The personal data of the data subject listed in the form will be kept for 3 years from the date they are provided. Personal data of applicants included in the applicant database will be kept for a period of 3 years from the date they are provided. In the case of a successful selection, the candidate's personal data will be further processed, based on the principle of compatibility of purposes, for the purpose of carrying out an employment relationship.</p>	<p><b>AGROSUN, spol. s r.o., Warcun, a. s., FK DAC 1904, a.s., DS OPERATOR, a.s., DS PROPERTY, a.s., EUROMILK, a.s., ISTERMEAT a.s., LOAR-VE, a.s., B.C.INVEST, a.s., SAGAX, s.r.o., LOAR, spol. s r.o., Media 2U, s. r. o.</b> are joint controllers; there are no other recipients for data transfer.</p>

3.	<p><b>Sending general marketing messages (adverts), promotional offers, requests to participate in satisfaction surveys or other surveys via e-mail, SMS (short messages)</b></p>	<p>Article 6 par. 1 lett. f) GDPR (processing is necessary for the purposes of legitimate interests pursued by the controllers). Legitimate interest: promoting joint controllers' products and services to potential customers, promoting controllers' activities and gaining insight into customer opportunities and expectations.</p>	<p>Name and surname, e-mail address, telephone number Data source: obtained from the data subject.</p>	<p>As long as the data subject does not object to the processing, but no later than 3 years from the date they are provided.</p>	<p><b>AGROSUN, spol. s r.o., Warcun, a. s., FK DAC 1904, a.s., DS OPERATOR, a.s., DS PROPERTY, a.s., EUROMILK, a.s., ISTERMEAT a.s., LOAR-VE, a.s., B.C.INVEST, a.s., SAGAX, s.r.o., LOAR, spol. s r.o., Media 2U, s. r. o.</b> are joint controllers; there are no other recipients for data transfer.</p>
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**Persons authorised to process your personal data:**

Your personal data will be processed only by a narrow circle of authorised persons of the controller.

**Operators:**

No operator will process personal data on behalf of the controller DUNEA, a.s.

**The processing of a special category of personal data (“sensitive data”) for the purposes specified in this Declaration on the processing of personal data:**

No special categories of personal data are processed.

**Transfer of data to third countries:**

No data will be transferred to a third country.

**Existence of automated decision-making, including profiling:**

Automated individual decision-making and profiling is not carried out.

**Your data protection rights:**

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, which repeals Directive 95/46/EC (**GDPR**) contains detailed information about your rights as a data subject for the protection of personal data, available remedies, as well as their limitations (especially Articles 5, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79 and 82). At any time, you can request information about the processing of personal data concerning you; you can request their rectification and erasure or the restriction of their processing, and you can also object to the processing of personal data based on a legitimate interest. The most important provisions are summarised in the text below.

**Right to information:**

If the controller processes personal data, it must provide you with information about the data concerning you, even without your specific request for their provision, including the main characteristics of the processing of personal data, such as the purpose, legal basis and storage (processing) period, identity and contact details of the controller and, in relevant cases, of its representative, contact details of the responsible person, recipients of personal data, legitimate interests of the controller and/or third parties in the case of processing personal data based on a legitimate interest, further your rights to data protection and available legal remedies (including the right to file a complaint with a supervisory authority), if you do not already have this information available. The controller will provide you with the above information by making available this Declaration on the Processing of Personal Data.

**Right to access data:**

You have the right to obtain confirmation from the controller about whether personal data concerning you are being processed or not, and if so, you have the right to obtain access to this personal data as well as the following information: purposes of the processing, categories of personal data concerned, recipients or categories of recipients to whom personal data have been or will be provided, especially recipients in third countries or international organisations, the expected period of the storage of personal data; if this is not possible, the criteria for its determination, the rights of the data subject to protect his personal data and his possibility to have it rectified (including the right to file a complaint with a supervisory authority), further information regarding the source of personal data, if the personal data were not obtained from you as the data subject.

On the basis of your request, the controller will provide a copy of your personal data that is being processed. The controller may charge a reasonable fee corresponding to administrative costs for any additional copies you request. If you submitted a request by electronic means, the information will be provided in a commonly used electronic form, unless you have requested another method. The right to obtain a copy cannot have adverse consequences on the rights and freedoms of others.

The controller will provide you with information about the possibilities, the procedure used, potential costs and other details about providing a copy after receiving your request.

**Right to rectification of data:**

You have the right to have the controller rectify any incorrect personal data concerning you without undue delay. With regard to the purposes of the processing, you have the right to supplement incomplete personal data, including by providing a supplementary declaration.

**Right to erasure of data:**

You have the right to obtain from the controller the erasure of personal data concerning you without undue delay, and the controller is obligated to erase personal data without undue delay if certain reasons apply or certain conditions are met. The controller is, among other things, obligated to erase your personal data at your request, if, for example, these personal data are no longer necessary for the purposes for which they were obtained or otherwise processed; if you withdraw your consent on the basis of which the processing is carried out and if there is no other legal basis for the processing; if the personal data were processed illegally; or if you object to the processing and there are no valid reasons for the processing; if the personal data must be erased in order to comply with a legal obligation under EU law or the law of a Member State to which the controller is subject.

The above-stated does not apply if the processing is necessary:

- a) for exercising the right to freedom of expression and information;
- b) for fulfilment of a legal obligation that requires processing under EU law or the law of a Member State to which the operator is subject;
- c) for the purposes of archiving in the public interest, for the purposes of scientific or historical research, or for statistical purposes, if it is likely that the right to erasure will make it impossible or seriously difficult to achieve the goals of such processing; or
- d) for demonstrating, exercising or defending legal claims.

**Right to restriction of processing:**

You have the right to have the controller restrict the processing of personal data in one of the following cases:

- a) you challenge the correctness of personal data and do so during the period permitting the controller to verify the correctness of personal data;
- b) the processing is illegal and you object to the erasure of personal data and request instead the restriction of their use;
- c) the controller no longer needs the personal data for the purposes of processing, but you need them to prove, exercise or defend legal claims;
- d) you object to the processing and do so until it is verified whether the legitimate reasons on the part of the controller prevail over your legitimate reasons.

If processing has been restricted on the basis of the above-mentioned reasons, such personal data, with the exception of storage, are processed only with your consent or to prove, exercise or defend legal claims or to protect the rights of another natural or legal person or for reasons of important public interest of the EU or a Member State.

The controller will inform you before the restriction of processing requested by you is cancelled.

**Right to data portability:**

You have the right to receive the personal data concerning you that you have provided to the controller in a structured, commonly used and machine-readable format, and you have the right to transmit this data to another controller without hindrance from controller to which you have provided this data, if:

- a) the processing is based on your consent or on a contract (to which you are a party), and
- b) if the processing is carried out by automated means.

When exercising your right to data portability, you have the right to transmit personal data directly from one controller to another controller, as long as this is technically possible. Exercising the right to data portability does not affect the provisions governing the right to erasure. The right to data portability must not have adverse consequences on the rights and freedoms of others.

**The right to object:**

You have the right at any time and for any reasons related to your specific situation to object to the processing of personal data concerning you which is carried out on the basis of the legitimate interests of the controller, including objection to profiling based on the aforementioned provisions. In this case, the controller may not further process your personal data unless it demonstrates necessarily legitimate reasons for processing that outweigh your interests, rights and freedoms, or reasons for proving, exercising or defending legal claims.

**The right to withdraw consent at any time**

In cases where the controller processes your personal data based on your consent, you have the right to withdraw your consent at any time. Withdrawal of consent does not affect the legality of the processing based on consent prior to its withdrawal. Withdrawing consent must be as easy as giving consent.

You can deliver the withdrawal of consent by mail to the address of the controller's registered office or e-mail address, or in the manner specified in the granted consent.

**How to exercise your rights:**

The controller will provide you with information on the measures adopted on the basis of your request based on the above-mentioned rights and do so without undue delay and in any case **within one month** of the delivery of such a request. The stated period can be extended by another two months, if necessary, taking into consideration the complexity of the application and the number of applications. The controller will inform you of any such extension within one month of receiving the request, together with the reasons for not meeting the deadline. If you submitted a request by electronic means, the information will be provided by electronic means where possible, unless you have requested otherwise.

If the operator does not take measures based on your request, it will inform you without delay and no later than one month from the delivery of the request about the reasons for not taking action and about the possibility to file a complaint with the competent supervisory authority in the Slovak Republic, the Personal Data Protection Office of the Slovak Republic, and apply a judicial remedy.

Contact details of the Personal Data Protection Office of the Slovak Republic: Hraničná 12, 820 07 Bratislava 27, tel.: +421 /2/ 3231 3214, e-mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk), web site: <https://dataprotection.gov.sk>.

The information given above shall be provided in writing or by other means, including by electronic means, if necessary. At your request, the information may be provided verbally, under the assumption that your identity has been demonstrated in another way.

Without affecting any other administrative or judicial remedy, you have the right to submit a complaint with a supervisory authority, especially in the Member State of your regular residence, place of work, or the site of the alleged infringement, if you believe that the processing of personal data concerning you is contrary to the Regulation. You have the right to an effective judicial remedy against a legally binding decision of the supervisory authority that concerns you. You further have the right to an effective judicial remedy if the relevant supervisory authority has not addressed the complaint or has not informed you within three months of the progress or outcome of the complaint you have made. The proposal to initiate proceedings against the supervisory authority is filed in the courts of the Member State in which the supervisory authority is established.

Without affecting any available administrative or non-judicial remedy, including the right to file a complaint with a supervisory authority, you have the right to an effective judicial remedy if you believe that the processing of your personal data in violation of the Regulation has violated your rights under in the Regulation. A proposal to start proceedings against a controller or operator is filed in the courts of the Member State in which the controller or operator is established. A proposal to start such proceedings can also be filed in the courts of the Member State in which you have your regular residence.

The court may order the controller to provide the relevant information, to rectify, block or erase it, to cancel a decision made by means of automated processing or to comply with your right to object. The court may also order the publication of its judgment in a manner that makes it possible to identify the controller or relevant operator, as well as the violation they have committed.

You may request compensation for damages you incurred in relation to the illegal processing of your personal data (including failure to take security measures) by the controller or the operator responsible for the damage. The operator is liable for damage caused by the processing, only if the obligations that the Regulation expressly imposes on the operator were not fulfilled, or if it acted beyond the scope of or contrary to the controller's instructions, which were in accordance with the law. If any of the above-mentioned persons violates your personal rights as a result of illegal data processing or failure to comply with personal data protection requirements, you are entitled to demand compensation from them.

The controller or operator is released from liability for damage caused by illegal processing if it proves that it bears no responsibility for the event that caused the damage (it was not at fault for the damage).

1 June 2023