

## Personal Data Processing Principles

### 1 INTRODUCTION

- 1.1. These Personal Data Processing Principles govern the rules for the processing of personal data by ELT Management Company Slovakia s.r.o., Vajnorská 171/A, 831 04 Bratislava, corporate ID: 50 096 273 (**Eltma**), as the data controller in the operation of a non-profit collective scheme for take-back of end-of-life tyres.
- 1.2. Eltma processes personal data of participants, operators of collection points, providers of treatment services, their employees, and other individuals (**data subjects**) in its operations.
- 1.3. The processing of personal data is governed by Regulation (EU) No. 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 (**GDPR**).

### 2 PROCESSING

#### Processed Personal Data

- 2.1. Eltma processes the following personal data of data subjects:
  - (i) Name and surname,
  - (ii) Business ID (for self-employed individuals),
  - (iii) Phone number,
  - (iv) Email,
  - (v) Address.
- 2.2. Eltma does not process sensitive data within the meaning of the GDPR.

#### Purpose and Legal Basis

- 2.3. Eltma primarily processes personal data for the purpose of the proper functioning of the collective scheme and compliance with relevant contractual and statutory obligations related to the operation of the collective scheme.
- 2.4. Eltma processes personal data based on the following legal titles:
  - 2.4.1. **Performance of a contract** – Eltma processes personal data for the purpose of performance of a contract concluded with a participant, operator of a collection point, provider of treatment services, or another person; the personal data of these subjects are also processed for the purpose of concluding the relevant contract;
  - 2.4.2. **Compliance with a legal obligation** – Eltma processes personal data to comply with legal obligations, in particular the obligation to keep records and archive certain

documents under Act No. 79/2015 Coll., on waste (**Waste Act**), and the obligation to keep tax documents under tax regulations;

- 2.4.3. **Legitimate Interest** – Eltma also processes personal data if the processing is necessary to protect the rights of Eltma or another affected person, e.g., for the exercise or defence of legal claims, prevention of fraud, or for direct marketing purposes.

#### **Automated Decision-Making and Profiling**

- 2.5. Eltma does not process personal data based on automated decision-making or profiling.

### **3 PROCESSORS AND RECIPIENTS**

- 3.1. Eltma may transfer processed personal data for processing to third parties.
- 3.2. Eltma may transfer personal data to entities providing the following services to Eltma:
- (i) Collective scheme administrative support services;
  - (ii) Information and telecommunication services;
  - (iii) Legal and other advisory services;
  - (iv) Archiving services;
  - (v) Treatment services.

#### **Transfer to Third Countries**

- 3.3. Personal data are not transferred to third countries outside the European Union or to international organizations.

### **4 RIGHTS OF DATA SUBJECTS**

#### **Right of Access to Personal Data**

- 4.1. The data subject is entitled to request from Eltma information about what personal data concerning them is being processed. Upon request, Eltma shall also provide data subjects with a copy of the data processed.

#### **Right to Rectification**

- 4.2. The data subject is entitled to request the rectification of inaccurate data or the completion of incomplete data processed.

#### **Right to Restrict Processing**

- 4.3. The data subject is entitled to request the restriction of the processing of their personal data if the processed personal data is inaccurate, the data subject believes the processing is unlawful, or the purpose of the processing has ceased.

#### **Right to Object to Processing**

- 4.4. In cases where Eltma processes personal data due to a legitimate interest, the data subject may object to such processing. Eltma will assess and evaluate any objection received. During the evaluation of the objection, the processing of personal data is restricted in accordance with section 4.3 of these Principles.

#### **Right to Erasure**

- 4.5. The data subject is entitled to request the deletion of processed personal data in the following cases:
- (i) The personal data are no longer necessary for the purposes for which they were processed;
  - (ii) The data subject objects to processing and there are no overriding legitimate grounds for processing;
  - (iii) The processing of personal data is unlawful.

#### **Right to Lodge a Complaint**

- 4.6. If the data subject believes that Eltma processes his or her personal data in violation of the GDPR, they may file a complaint with the Personal Data Protection Authority.

### **5 RETENTION PERIOD**

- 5.1. Eltma retains the personal data of data subjects for the duration of the contract and subsequently for the period specified by the relevant legal regulations, in particular Waste Act and tax legislation.

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ELT Management Company Slovakia s.r.o.

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**ELT Management Company Slovakia s.r.o.**

Vajnorská 171/A Bratislava 810 04 Corporate ID: 50 096 273

registered in the Commercial Register of the Municipal Court Bratislava III, section: Sro, insert n.: 108173/B

Non-profit producer responsibility organisation for end-of-life tyres, authorisation number AOZV25PNE00081