

INFORMATION ON PROCESSING OF PERSONAL DATA OF THE DATA SUBJECT NOT BEING THE EMPLOYEE OF MONDI SCP, A.S

pursuant to Art. 13 Regulation (EU) 2016/679 of the European Parliament and of the
Council (GDPR)

Mondi SCP, a.s. regards the observance of the legal conditions for the processing of personal data of the data subjects as the data subjects as one of its priorities. All the actions performed in the individual stages of the processing of personal data are carried out with the utmost emphasis on the protection of the fundamental rights of the data subjects, in particular, on the protection of personality and privacy and the observance of the principles of lawful processing of personal data.

In the process of protection and processing of personal data, Mondi SCP, a.s., Tatranská cesta 3, 034 17 Ružomberok, Company Registration Number: 31 637 051, registered with the Companies Register of the District Court in Žilina, Section: Sa, Insertion No. 306/L acts as Operator (hereinafter referred to as "Operator" or "Mondi SCP"). Mondi SCP processes all personal data in accordance with the applicable legislation, in particular 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, repealing Directive 95/46/EC (GDPR) (hereinafter referred to as the "Regulation" or "GDPR") and Act No. 18/2018 Coll, on personal data protection and on amendments to certain laws (hereinafter "the Act" or "Act No. 18/2018").

This document applies mainly to the data subjects who are not employees of Mondi SCP, a.s.. The information contained in this document is the information in the sense of the Art. 13 of the Regulation.

LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA IN CONNECTION WITH THE PURPOSE OF PROCESSING

1. Compliance with Legal Obligations

The Operator is entitled to process the personal data of the data subject if the processing of his/her personal data is necessary to fulfil a statutory obligation laid down either by the Union law or by the law of the Member State which applies to the Operator. When processing personal data under a special regulation, the Operator processes the personal data of data subjects without their consent (i.e. a specific regulation directly authorizes and empowers him/her to process data). When processing personal data on the basis of this legal basis, the Operator is obliged to process the personal data only in the scope and manner prescribed by this specific regulation.

The aforementioned statutory obligation results, in particular (but not limited to), from the following legislation as amended:

The Act No. 311/2001 Coll. - Labour Code, Act No. 124/2006 Coll, on occupational safety and health, the Act No. 461/2003 Coll, on social insurance, the Act No. 580/Coll. on health insurance, the Act No. 5/2004 Coll, on employment services, the Act No. 595/2003 Coll, on income tax, the Act No. 43/2004 Coll, on old-age pension savings, the Act No. 650/2004 Coll, on supplementary retirement savings, the Act No. 152/1994 Coll, on the social fund, the Act No. 355/2007 Coll, on the protection, promotion and development of public health, the Act No. 40/1964 Coll. - Civil Code, the Act No. 160/2015 Coll. - Civil

Dispute Proceedings, the Act No. 300/2005 Coll. - Criminal Code, the Act No. 372/1990 Coll, on offenses, the Act No. 71/1967 Coll. - Administrative Procedures, the Act No. 233/1995 Coll, on judicial executors and executor activities, the Act No. 513/1991 Coll. - Commercial Code, the Act No. 395/2002 Coll, on archives and registries and on the amendments to certain laws, the Act No. 431/2002 Coll. - on accounting, the Act No. 18/2018 Coll, on personal data protection, the Act No. 307/2014 Coll, on certain measures related to the reporting of anti-social activities, the Act No. 496/2002 Coll, on reporting of the citizens of the Slovak Republic and on the public registers, the Act no. 315/2016 Coll, on registers of public sector partners, the Act No. 179/2011 Coll, on economic mobilization and amending the Act No. 387/2002 Coll. Coll, on administration of state apart from the times of war and the state of war

The purpose of processing of personal data pursuant to the aforementioned legislation is, in particular:

- a) fulfilling the obligations of the Operator in the area of the personnel and payroll agenda,
- b) observance of the principles of the occupational safety and health protection arising from the employment relationships,
- c) fulfilling the statutory obligations arising from the accounting or tax regulations,
- d) fulfilling the obligations arising from § 7 Paragraph 10 of the Act and No. 179 / 2011 Coll, on economic mobilization and amendment of the Act No. 387/2002 Coll, on administration of state apart from the times of war and the state of war as amended by later legislation,
- e) the implementation of anti-pandemic measures in connection with the COVID-19 virus pandemic and thus the protection of health at the controller's workplaces and premises; in this case, the legal basis is in particular Act no. 355/2007 Coll. on the protection, support and development of public health, as amended (hereinafter referred to as the "Health Protection Act") in conjunction with the currently valid decrees of the Public Health Office of the Slovak Republic¹ [hereinafter also referred to as "ÚVZ SR"] In cases of the unfavorable epidemiological situation, the SR orders the Controller to prohibit entry into the premises for persons who do not prove a negative result of the COVID test or other documents proving exceptions from the given prohibition). In order to fulfill this obligation, the Controller may inspect the given documents; it cannot be ruled out that this authorization may be extended to the right to inspect the identity document, or to make extracts from the said documents as photocopies.
- f) provision of legal activities, in particular, preparation of contracts, legal filing, authorizations, compensation for damage to property, damage to health as a result of occupational injury or occupational disease
- g) obligations related to the requirements of the Public Sector Partners Registration,
- h) investigation of complaints pursuant to the Act No. 307/2014 Coll, on certain measures related to reporting of anti-social activities and on the amendment of certain laws as amended,
- i) registry administration and archiving.

2. Legitimate Interest

The personal data processing is also lawful if it is necessary for the purpose of the legitimate interests of the Operator or a third party unless the interests or rights of the data subject requiring the personal data protection prevail over these interests.

¹Decrees as well as other legal regulations relating to us are constantly updated and change, and thus the measures we take change, as these must respond to the change in measures. An overview of current state measures can be found at <https://korona.gov.sk/#aktualne-opatrenia>

The legitimate interests include:

- a) ensuring safety, protection of life and health, protecting property and property values when entering, moving around and leaving the premises of Mondi SCP,
- b) preparing and issuing personal identification cards for permanent and temporary admissions of data subjects to Mondi SCP,
- c) protection of public order and security, detection of crime, detection and documentation of criminal activities,
- d) continuous monitoring by means of the camera system, in particular: to monitor the production technological process, to protect the property of the Operator, as well as other persons, to protect the life and health of the persons located in the premises accessible to the public or in the Mondi SCP area, compliance with the OSH principles, investigation of unwanted events, including monitoring the movement of individuals, prevention and detection of potential crime,
- e) providing communications and information devices, systems and applications, ensuring technical support and access to applications,
- f) organization of cultural and social events,
- g) executing the internal audit activities,
- h) dealing with criminal, offense and criminal proceedings (criminal information),
- i) dealing with the agenda related to providing loans, recovery of debt from the loans granted by the employer to employees, recovery of other debts from employees and former employees of the company,
- j) ensuring network and information security, as well as cyber security (i.e. implementing the measures to prevent unauthorized access to the electronic communications networks and to prevent spreading of malicious program codes, as well as to stop attacks involving server overloads and damage to computer and electronic communications systems,
- k) web site administration, including a limited number of cookie usage data.

The Operator processes personal data without the consent of the data subject even if the processing of personal data is necessary for academic, artistic, literary or journalistic purposes, in particular, for the purpose of corporate newsletter activities.

3. Performance of Contract

The Operator processes personal data without the consent of the data subject if processing of personal data is necessary for performance of the contract with the data subject being one of the parties of the contract or for the execution of a pre-contractual measure at the request of the data subject, that is to say, under the pre-contractual relationships.

4. Consent of the Data Subject

The consent to the personal data processing must be freely given and must be specific, informed and unambiguous. The conditions for giving consent are further regulated in the Article 7 of the Regulation. In order to regard the consent as valid, the legal basis for processing should be a particular expression of the data subject's wish. The consent of the data subject as the legal basis is used by Mondi SCP exceptionally, only in the cases where one of the above-mentioned legal bases cannot be applied to the processing of personal data. The data subject has the right to withdraw his/her consent at any time in writing. However,

the withdrawal of the consent does not affect the lawfulness of processing based on the consent prior to its withdrawal.

CATEGORIES AND RANGE OF PERSONAL DATA PROCESSED FOLLOWING THE PURPOSE OF PROCESSING

- a) **Identification, contact data:** necessary, for example, for registration of entries into Mondi SCP premises, in particular, degree, name, surname, permanent address, temporary residence address, correspondence address, date of birth, nationality, ID type and number,
- b) **Personnel and payroll agenda:** for example, name, surname, date of birth, place of birth, nationality, birth certificate number, data on the payments received and sent (in particular wages), payroll data, data necessary for payment of tax and deduction,
- c) **Data on the students of the secondary vocational school and on the vocational education supervisors:** the data processed in connection with the provision of practical training of the secondary vocational school students in the premises of the employer (the Operator). These data include: name, surname, branch of study, year of study, grades, attendance, etc.,
- d) **Operational data on the entries** of individual data subjects and on the time spent in the premises of Mondi SCP, vehicle plate number
- e) **Photography, camera recording,**
- f) **Access rights data:** (e.g. email address), as well as the data recorded when using information systems and applications (electronic approvals, confirmations - logins, other operations, passwords, usernames, etc.),
- g) **Data specified in documents:** data that are part of contracts, invoices, orders, etc.,
- h) **Accounting data:** e.g. data on the payments received and sent, bank correspondents, account number.
- i) **Health data:** under certain circumstances we may also process your health data. Specifically, if ordered by the Health Protection Act or the relevant decree of the ÚVZ SR. The processing will take place if it is done in an automated way or in a non-automated way, if the data will be part of an information system (for example, the results of COVID tests).

DATA SUBJECTS

The data subjects are legal relations parties, included mainly in contracts, invoices and orders, the data subjects within the agenda of lawsuits - legal proceedings, administrative proceedings, members of the statutory body, members of the supervisory board, representatives and employees of business partners or their subcontractors, agents and employees of the companies in which Mondi SCP has its stake, the Operator's shareholders, visitors, persons entering the Operator's premises, other entities based on legal base pursuant to the Act.

RETENTION PERIOD FOR PERSONAL DATA

Mondi SCP processes personal data for the duration of the processing purpose. The personal data storage is governed by the Act no. 395/2002 Coll, on archives and registries in connection with the Operator's Registration Plan, approved by the Ministry of the Interior of the Slovak Republic.

INTERMEDIARIES AND OTHER RECIPIENTS

The Operator is authorized to entrust an intermediary with the personal data processing on the basis of a written contract. In such cases, the personal data processing by the intermediary does not require the consent of the data subject. The list of the contractually authorised intermediaries shall be provided, upon request of the data subject, by the person responsible for the protection of personal data from Mondi SCP, contact: Osobneudaie.Mscp@mondigroup.com

External auditor companies may be recipients of personal data when this is necessary for execution of an audit.

In exceptional circumstances, the Operator may authorise intermediaries to enable other intermediary - subcontractor to process the personal data of the data subject, solely on the basis of a written contract containing the same legal, security and other guarantees of the lawfulness of the personal data processing as a contract concluded between the Operator and the Intermediary. The subcontractor is obliged to undertake in writing that all of his/her processing operations related to the personal data of the data subjects will meet all the conditions and requirements defined in the Regulation.

Mondi SCP does not provide the personal data of data subjects to any third parties unless this obligation results from a specific, generally binding legal regulation. For example, law enforcement authorities, courts, executor offices, labour inspectorates, tax authorities, supervisory and state inspections bodies, etc.

CROSS-BORDER TRANSFERS OF PERSONAL DATA

The Operator does not perform any cross-border transfer of personal data to third countries.

AUTOMATED INDIVIDUAL DECISION MAKING AND PROFILING

The Operator does not perform processing of personal data exclusively in the form of automated decision making, including profiling pursuant to § 28 Paragraph 1 and 4 of the Act.

RIGHTS OF THE DATA SUBJECTS

The right to withdraw the consent to process personal data

In the cases where Mondi SCP processes the personal data of the data subjects on the basis of their consent, the data subjects have the right to withdraw this consent at any time. The consent can be withdrawn electronically via an email address of the person in charge, in writing, with a notice of withdrawal of consent or personally at the Operator's premises. The withdrawal of the consent does not affect the lawfulness of the processing of personal data that the Operator has so far processed.

The right to access one's personal data

The data subject has the right to be provided a copy of the personal data that the Operator has at its disposal, as well as to the information on how the personal data of the data subject is being used. In most cases, personal data will be provided to the applicant in a written form, unless otherwise requested. If the applicant requests this information by electronic means, it will be sent to her/him electronically if this is

technically possible.

The right to have one's personal data corrected

Mondi SCP shall take appropriate technical and procedural steps to ensure that it, as the Operator, ensures the accuracy, completeness and that the information processed is up to date. Any data subject who considers that the Operator has personal data that is inaccurate, incomplete or out of date has the right to ask the Operator to take corrective action, i.e. to modify, update or supplement this information.

The right to erasure (right to be forgotten)

The data subject has the right to ask the Operator to erase his or her personal data, for example, if the personal data obtained by the Operator is no longer necessary to fulfil the original purpose of the processing. The data subject has right to request the erasure of his/her personal data in the following cases:

- a) the personal data which is no longer required for the purposes for which it was obtained or otherwise processed,
- b) the personal data processed under the consent when the data subject withdraws this consent and there is no other legal basis for the processing,
- c) if the data subject objects to processing pursuant to the Article 21 (1) GDPR and no legitimate reasons for processing prevail, or the data subject objects to processing pursuant to the Article 21 (2) GDPR,
- d) if it has been processed unlawfully,
- e) if it has to be erased in order to comply with a statutory obligation under the Union law or the law of the Member State to which the Operator is subject.

The Operator shall always assess all the relevant circumstances in terms of the application for the erasure of one's personal data.

The right to erasure cannot be exercised in the cases where the processing of personal data is necessary:

- a) to exercise of the right to freedom of expression or the right to information,
- b) to comply with an obligation under this Act, a special regulation or an international treaty binding on the Slovak Republic, or to fulfil a task executed in the public interest or during execution of the powers of the public authority entrusted to the Operator,
- c) on the grounds of the public interest in the area of public health in accordance with § 16 Paragraph (2) (h) to (j) of the Act,
- d) for the purpose of archiving, for scientific purposes, for the purpose of historical research or for statistical purposes pursuant to § 78 (8) of the Act, if it is probable that the right to erasure will prevent or seriously impair the achievement of the objectives of such processing, or
- e) to exercise a legal claim.

The right to restrict processing

Under certain circumstances, the data subject has the right to ask the Operator to cease using his/her personal information. The instances include:

- a) the data subject will contest the personal data accuracy during a period allowing the Operator to verify the accuracy of the personal data,
- b) processing is unlawful and the data subject objects to the erasure of personal data and asks, instead, to limit its use,
- c) the Operator no longer needs personal data for processing purposes but the data subject needs it to prove, enforce or defend legal rights,

- d) the data subject objected to the processing under the Article 21 (1) GDPR until the moment of verification whether the legitimate reasons on the part of the Operator prevail over the legitimate reasons of the data subject.

The right to data portability

The data subject has the right to transfer his/her personal data to another operator at his/her discretion without being impeded by the Operator if:

- a) processing is based on consent or contract, and
- b) processing is carried out by automated means.

The right to object to processing personal data

The data subject has the right to object to the processing of his/her personal data due to his/her specific situation performed under § 13 (1) (e) or (f) of the Act, including profiling based on these provisions. The Operator may no longer process personal data unless it demonstrates the necessary legitimate interests for the personal data processing that prevail over the rights or interests of the data subject or the grounds for exercising a legal claim. The data subject has the right to object to the processing of personal data concerning him/her for the purpose of direct marketing, including profiling to the extent related to the direct marketing. If the data subject objects to the processing of personal data for the purpose of direct marketing, the Operator may no longer process personal data for the purpose of the direct marketing.

The method of exercising one's rights

The data subject may exercise his/her rights as described above with the Operator in the following manner:

- a) in writing or electronically, the content of which must indicate what is claimed and applied,
- b) orally, in person, in minutes from which it must be clear who has exercised the right, what is claimed and when and who has drawn up the minutes, his/her signature and the signature of the data subject,
- c) when exercising his/her rights, the data subject has to prove his/her identity in an appropriate manner, in order to make sure that the Operator does not ensure performance with a person not being the data subject.

Similarly, the data subject may also exercise his/her rights with the intermediary.

The data subject may, at any time and in writing, contact the responsible person in the event of any questions related to the protection of personal data in accordance with the Act or the Data Protection Officer in connection with the Regulation to answer any questions regarding the processing of his/her personal data. Contact: Osobneudaie.Mscp@mondigroup.com

The data subject who considers that his/her rights under the personal data protection have been infringed may lodge a complaint with the supervisory authority - the Personal Data Protection Office or a motion to initiate the personal data protection procedure pursuant to § 100 of the Act.