

Privacy Policy

INFORMATION ON PERSONAL DATA PROTECTION GDPR

Who is the controller and responsible person

Občianske združenie pre rozvoj cyklistickej infraštruktúry, Školská 33, 931 01 Šamorín, ID No.: 42401909, website: <https://rci.sk/> (also referred to as the "Company" or the "Controller"), is the controller within the meaning of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter the "Regulation" or "GDPR") and Act No. 18/2018 Coll. on the protection of personal data and on the amendment and supplementation of certain laws (hereinafter the "Personal Data Protection Act").

In this Information on personal data protection you will find more detailed information about the processing of your personal data as well as information about your rights as a data subject that you are entitled to under the Regulation and the Personal Data Protection Act for the purposes of providing services related to automated bicycle rental, on the basis of which the Company enables users temporary short-term use of bicycles under the conditions set out in the relevant documents, particularly the General Terms and Conditions (hereinafter "bikesharing").

Due to compliance with the principle of data minimization, all provided personal data are necessary legal or contractual requirements to fulfill the purpose of their processing. Failure to provide the required data necessary to conclude the contract may result in the contract not being concluded. Our Company is the Controller of your personal data, meaning our Company determines the purposes and means of processing your personal data.

If you have any questions relating to our personal data protection, including exercising the rights of data subjects under the Regulation and the Personal Data Protection Act, you may contact us, as the controller, by the following means:

- a) by email request sent to: info@slovnaftbajk.sk or info@rci.sk,
- b) by sending a written request to the registered office address of the controller with the text "GDPR" on the envelope.

Which personal data we process

Our Company as the Provider processes the following personal data that you provide to our Company through the Slovnaft eBAJK mobile application or otherwise, particularly:

- a. identification data (in particular name, surname, payment details, cardholder name);
- b. contact data (email address, telephone number);
- c. location data (in particular data about rented bicycles, e.g. bicycle location at the start and end of the rental period, other data related to bicycle location);
- d. transaction data (in particular data about customer transactions).

Our Company as the Provider does not process special categories of personal data (sensitive data) for the purposes stated in this Information on personal data protection. Special categories of personal data are personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic data, biometric data for uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. If

processing of any special category of your personal data becomes necessary, we will either request your explicit consent or process such personal data on another relevant legal basis.

Customer GPS location data is used only by the Slovnaft eBAJK App directly at the time, if you have given consent to location.

COOKIES AND OTHER ELECTRONIC DATA

Cookies are small text files that can be used by websites to make the user's experience more efficient. The law states that we may store cookies on your device if they are strictly necessary for the operation of these pages. For all other types of cookies we need your consent!

Essential cookies are strictly necessary to provide you the services available through our websites and to use some of their functions. Because these cookies are strictly necessary for the basic functioning of the website, you cannot refuse them without affecting the operation of our site. You can block or delete them by changing your browser settings and blocking all cookies.

Google Analytics cookies collect information that is used either in aggregate form to help us understand how our website is used or how effective our marketing campaigns are, or to help us tailor our website and application to you in order to improve your experience. If you do not want to be tracked, you can disable tracking in your browser.

By visiting the websites rci.sk and slovnaftebajk.sk your web browser provides the website administrator with data such as the type of web browser you use, the type of your operating system, the page from which you visit the website, the date and time of your access and your IP address.

PURPOSE AND LEGAL BASIS OF PERSONAL DATA PROCESSING

Below we inform you about the different processing operations in which you may be involved, as well as the individual legal information obligations for you as a data subject under the Regulation and the purposes of personal data processing, noting that we process personal data to the minimum extent necessary. When providing our services, we always process your personal data for a specific, predetermined purpose, and each processing purpose requires only some of your personal data. Please note that if you do not provide us with the relevant personal data necessary for a given purpose, we will not be able to provide you with the given service in full or at all.

We determine the scope of processing individually and are responsible only for our own processing activities. Our Company uses the services of its legal partners to manage and successfully assert its claims and provides the required personal data to such legal partners for this purpose. These legal partners act as independent controllers in accordance with the provisions of their own Privacy Statements. In case legal partners are engaged in a specific case and upon request of an individual, we will provide information about the legal partner involved in the specific data processing operation, as well as the legal partners' contact details.

A processor is anyone who processes personal data on behalf of our Company. Personal data is processed for the following purposes and based on the following legal bases:

1. **Customer registration in the Slovnaft eBAJK application for the purpose of providing the service (based on performance of the contract and within pre-contractual relations) and bicycle rental:** this is the processing of identification, contact, location and transaction data for the purposes of short-term bicycle rental and customer registration into the system via the mobile application, email or phone.

Legal basis: Article 6(1)(b) GDPR – processing is necessary for the performance of the General Terms and Conditions (contract), which are available in the Slovnaft eBAJK application and which the customer has accepted.

Scope and retention period of processed data: name, surname, telephone number, email address and payment details. Personal data will be retained for the duration of the contract and subsequently for ten years following the year in which the contract expired/was fulfilled (according to Act No. 431/2002 Coll. on accounting as amended, Act No. 566/2001 Coll. on securities and investment services and Act No. 186/2009 Coll. on financial intermediation and financial consultancy). In case legal action is initiated against the customer as debtor, our Company will process personal data for the necessary duration during which the said legal proceedings last.

Data processors: Joyride Technologies Inc., 325 Front St West, 4th Floor, Toronto, Ontario M5V 2Y1, Canada (operation of the Slovnaft eBAJK application) and Stripe Inc., 354 Oyster Point Boulevard, San Francisco, California, 94080 (processing customer payments).

2. **GPS localization:** processing of location data obtained through the customer's device.

Legal basis: Article 6(1)(a) GDPR (voluntarily given consent of the customer).

Scope and retention period of processed data: The customer may grant consent in the Slovnaft eBAJK application to make their GPS location available. The Controller does not record the customer's GPS location data. It is used only by the Slovnaft eBAJK application directly at the time. The Company processes personal data until the customer withdraws consent.

Data processor: Joyride Technologies Inc., 325 Front St West, 4th Floor, Toronto, Ontario M5V 2Y1, Canada (operation of the Slovnaft eBAJK application).

3. **Operation of the information center:** processing of identification, contact and/or location data in connection with providing the Bikesharing service, handling claims, suggestions and customer complaints.

Legal basis: Article 6(1)(b) GDPR (processing is necessary for the performance of the contract) and Article 6(1)(c) GDPR (processing is necessary for compliance with a legal obligation), e.g. for handling complaints.

Scope and retention period of processed data: Name, surname, bicycle number, telephone number and email address, starting location of the bicycle at the start of the ride, partial bicycle location during the ride - to a limited extent, final bicycle location at the end of the ride. For this purpose personal data may be processed for a period of three (3) years from the settlement of the rental complaint (i.e. after the ride has ended). In case legal action is initiated against customers, our Company will process personal data for the necessary duration during which the said legal action lasts.

Data processor: The Capital City of the Slovak Republic Bratislava, Primaciálne námestie 1, 814 99 Bratislava, Slovak Republic (operation of the information center).

4. **Fulfillment of the Company's obligations in invoicing, accounting and tax administration:** processing of identification and invoicing data in connection with fulfilling obligations in invoicing, accounting and taxes.

Legal basis: Article 6(1)(c) GDPR - processing is necessary for compliance with a legal obligation.

Scope and retention period of processed data: name, surname, permanent address, customer's payment details, information on order and payment history. Personal data will be retained for the

duration of the contract and subsequently for ten years following the year in which the contract expired/was fulfilled (according to Act No. 431/2002 Coll. on accounting as amended, Act No. 566/2001 Coll. on securities and investment services and Act No. 186/2009 Coll. on financial intermediation and financial consultancy).

Data processors: Joyride Technologies Inc., 325 Front St West, 4th Floor, Toronto, Ontario M5V 2Y1, Canada (operation of the Slovnaft eBAJK application) and Stripe Inc., 354 Oyster Point Boulevard, San Francisco, California, 94080 (processing customer payments).

5. **Marketing (sending information leaflets - newsletter, direct marketing, offers and advertisements for products including various competitions, e.g. on Instagram/Facebook):** processing of the customer's contact data which was provided voluntarily.

Legal basis: Article 6(1)(a) GDPR (voluntarily provided consent of the customer). According to § 62(3) of Act No. 351/2011 Coll. on electronic communications as amended, prior consent of the recipient of electronic mail is not required if it concerns direct marketing of one's own similar goods and services where the contact details were obtained by the same person in connection with the sale of goods or services and in accordance with the said Act or a special regulation.

Scope and retention period of processed data: customer's email address, name, surname, or pseudonym. The Company processes these data until the customer withdraws consent.

Data processors: SLOVNAFT, a.s., Vlčie hrdlo 1, Bratislava 824 12, Slovak Republic (publishing data on organized competitions/campaigns and their evaluation), The Capital City of the Slovak Republic Bratislava, Primaciálne námestie 1, 814 99 Bratislava, Slovak Republic (contacting winners).

6. **Tracking the bicycle location in case of theft, loss (suspicion), complaint or malfunction of the bicycle:** processing of GPS location data obtained via the tracker on the e-bike.

Legal basis: Article 6(1)(f) GDPR (legitimate interest), Article 6(1)(b) GDPR (processing is necessary for the performance of the contract) and Article 6(1)(c) GDPR (processing is necessary for compliance with a legal obligation).

Scope and retention period of processed data: processing of bicycle location data. If the data are necessary to assert legal claims, complaints or in case of initiating legal proceedings against a customer, our Company will process personal data for the duration necessary for the proceedings. If the record of the bicycle route during the rental until docking in the docking station is not necessary for asserting legal claims or defending against any civil claims, the Controller will anonymize the personal data without delay after proper docking of the bicycle in the docking station.

Data processor: Joyride Technologies Inc., 325 Front St West, 4th Floor, Toronto, Ontario M5V 2Y1, Canada (operation of the Slovnaft eBAJK application).

7. **Identification and contact details of representatives of legal entities and other natural persons:** processing of identification and contact personal data of representatives of legal entities and other natural persons obtained from publicly available sources designated for this purpose, from those persons directly or via email, forms, chats placed on social networks/Slovnaft eBAJK app, etc., which the Company needs to be able to contact other legal and natural persons for the proper operation of the Company and to provide you with information related to our Company.

Legal basis: Article 6(1)(f) GDPR (legitimate interest).

Scope and retention period of processed data: The Company processes personal data necessary to ensure contact. These data are processed for the period necessary to establish contact with the mentioned persons, or to provide the information/cooperation requested by those persons, but no longer than five (5) years from their acquisition.

8. **Exercising legal claims by the Company:** defense in legal disputes and proceedings with authorities initiated by customers in connection with the provision of Bikesharing services or under Article 17(3)(e) GDPR.

Legal basis: Article 6(1)(f) GDPR (processing is necessary to fulfill the legitimate interests of the Company).

Scope and retention period of processed data: name, email, telephone number (only if the dispute concerns the lawfulness of its processing), data about use of the Bikesharing services. In case of initiating judicial or other legal proceedings, our Company will process personal data for the necessary period during which the said judicial or other legal proceeding will last, until the definitive termination of such proceedings or attainment of the legitimate interest by other means (e.g. out-of-court settlement).

Your personal data may also be provided to other entities if our Company believes that such provision of personal data is:

- a. in accordance with generally binding legal regulation, GDPR; or
- b. necessary for the purposes of asserting, establishing or defending the Company's lawful right/claim; or
- c. necessary to protect the important interests of our Company or the important interests of any other person, and this may involve providing personal data to some of the following entities: law enforcement authority, prosecutor's office or court; banks; auditors; legal representatives; notary as court commissioner; tax authority; supervisory and control authorities; government agency; enforcement officer; administrator or preliminary administrator in bankruptcy or restructuring, insolvency or debt relief proceedings or supervisory administrator performing supervisory management; municipality, city, higher territorial unit; ministry; National Audit Office of the Slovak Republic; National Security Authority of the Slovak Republic; Slovak Trade Inspection; Judicial Treasury; Office for Personal Data Protection of the Slovak Republic; Financial Directorate of the Slovak Republic or another entity. These entities act as independent controllers in accordance with the provisions of their own Privacy Statements.

Transfer of personal data to third countries

Third countries are all countries other than EU Member States and countries that are contracting parties to the Agreement on the European Economic Area. Our Company transfers data to Canada and the USA (California) only in accordance with the aforementioned processing operations, which are expressly intended solely for the provision of Bikesharing services. These data are processed by Joyride Technologies Inc., 325 Front St West, 4th Floor, Toronto, Ontario M5V 2Y1, Canada (operation of the Slovnaft eBAJK application) and Stripe Inc., 354 Oyster Point Boulevard, San Francisco, California, 94080 (processing customer payments). The European Commission issued an adequacy decision (Commission Decision No. 2002/2/EC) under Directive 95/46/EC stating that the recipient of personal data in Canada is bound by an equivalent personal data protection regime as applies in the EU, which means that data may be transferred to another company in that third country without our being obliged to provide additional safeguards because the recipient of those data provides an adequate

level of protection equivalent to an EU Member State. According to a further decision of the European Commission, transfers of personal data performed by European controllers and processors to certified organizations in the USA, such as internationally recognized payment gateway providers like Stripe Inc., do not require any additional authorizations. A certified organization in the USA commits to comply with the set of privacy protection rules between the EU and the USA including additional principles issued by the US Department of Commerce (IMPLEMENTING DECISION OF THE COMMISSION (EU) 2023/1795). Other than that, we do not make nor intend to make transfers of your personal data to other third countries that do not provide an adequate level of personal data protection except where such transfer is expressly required by generally binding legislation or a decision of a state authority. If the nature of the service requires the transfer of personal data to third countries, we will comply with all conditions set out in Articles 44 to 49 of the GDPR and other GDPR requirements so that such transfer meets all safety standards and does not violate your rights and freedoms.

Processing of special categories of personal data

Our Company does not process any special categories of personal data.

Automated decision-making and profiling

Within the Slovnafit eBAJK service our Company does not perform automated decision-making nor profiling in relation to your personal data.

Measures to ensure data security

Our Company applies appropriate administrative, technical and organizational security measures to protect personal data which under our Company's control protect against unauthorized access, collection, use, disclosure, copying, modification or destruction. All personal data you provide are stored on secure servers.

Our Company creates an integrated security system at network, infrastructure and application levels (using firewalls, antivirus software, mechanisms for encrypting stored data and communications, as well as using content filtering and other technical and procedural solutions). Personal data breach events are continuously monitored and controlled.

Your rights regarding data processing

You also have rights in relation to the protection of your personal data (personal data concerning you). Articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79 and 82 GDPR describe your rights and available legal remedies in detail. These rights include:

Right of access: You have the right to request from our Company confirmation as to whether our Company is processing your personal data, which personal data is processed, for what purposes, for how long they are stored, where we obtain them from, to whom and to which recipients we provide them, who the recipients and processors of these data are, whether and how automated decision-making including profiling takes place in processing personal data and what other rights you have in connection with the processing of your personal data. All this information is provided in this Information on personal data protection.

At your request, the Company is obliged to provide you with a copy of your personal data that it processes. For any further copies you request, the Company may charge a reasonable fee corresponding to administrative costs. If you have submitted the request by electronic means, information will be provided in a commonly used electronic form, unless you requested otherwise.

Right to rectification: if our Company processes your personal data and they are inaccurate, incorrect or incomplete, you have the right to have our Company rectify or complete those personal data without undue delay.

Right to erasure (right to be forgotten): in the following cases you have the right to have personal data that our Company processes erased without undue delay. We are obliged to erase your personal data at your request, for example, if personal data are no longer necessary for the purposes for which they were collected or processed; if you withdraw the consent on which processing is based and there is no other legal basis for processing; if personal data have been processed unlawfully; if you object to processing and there are no overriding legitimate grounds for processing; if personal data must be erased to comply with a legal obligation under Union or Member State law to which the Company is subject; or if personal data were collected in connection with the offer of information society services. If data are processed based on your consent, as a result of the withdrawal of that consent you must not receive further marketing messages, offers, coupons and similar. We inform you that the withdrawal of your consent does not affect the lawfulness of processing carried out on the basis of your consent prior to its withdrawal.

Please note that even where one of the above cases applies, our Company is not obliged to erase personal data if processing is necessary for the exercise of the right to freedom of expression and information; or to comply with the Company's legal obligation under generally binding law; or for archiving purposes in the public interest, scientific or historical research or statistical purposes; or for establishing, exercising or defending legal claims of our Company.

Right to restriction of processing: In certain cases you have, in addition to the right to erasure, the right to restrict processing of personal data, by which you can request in specific cases that your personal data be marked and not subject to further processing operations for a certain period. Our Company is obliged to restrict processing of your personal data if you contest the accuracy of personal data, for the period enabling our Company to verify the accuracy of such personal data; or processing of your personal data is unlawful and you oppose erasure of such personal data and request instead a restriction of their use; or our Company no longer needs your personal data for processing purposes but you need them to establish, exercise or defend legal claims; or you object to processing based on legitimate interests until it is verified whether the Controller's legitimate grounds outweigh your legitimate reasons.

If processing has been restricted on the above grounds, such personal data shall, except for storage, be processed only with your consent or for the establishment, exercise or defense of legal claims or to protect the rights of another natural or legal person or for reasons of important public interest of the Union or a Member State. The Company must inform you before lifting the restriction on processing.

Right to data portability: You have the right to receive all your personal data that you have provided to our Company, where our Company processes them based on consent or for the performance of a contract, and where the data are processed by automated means (electronically). We will provide your personal data in a structured, commonly used and machine-readable format and you have the right to transfer these personal data directly to another controller where technically feasible.

Right to object: You have the right to object to the processing of your personal data carried out on the basis of public interest or legitimate interest, including objecting to profiling based on legitimate interest. Our Company will no longer process your personal data unless it can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defense of legal claims.

If our Company processes your personal data for direct marketing purposes, you have the right to object at any time to the processing of such personal data for such marketing purposes, including profiling to the extent that it is related to such direct marketing. If you object to processing your personal data for direct marketing, our Company will no longer process such personal data for such purposes. If the Company does not have compelling legitimate grounds for processing and you object, we will stop processing your personal data.

How to exercise your rights: We will provide you with information regarding the measures taken in response to your request based on the above-mentioned rights without undue delay and, in any case, within one month of receiving the request. This period may be extended by an additional two months if necessary, taking into account the complexity of the requests and their number. As the Company, we must inform you of any such extension within one month of receiving the request, along with the reasons for failing to meet the deadline. If you submit your request electronically, the information will be provided electronically whenever possible, unless you have requested another method.

Right to file a complaint: If you suspect that your personal data is being processed unlawfully, in addition to exercising the rights listed above, you may file a complaint with a supervisory authority, particularly in the Member State of your habitual residence, place of work, or the place where the alleged infringement occurred. The supervisory authority in the Slovak Republic is the Office for Personal Data Protection of the Slovak Republic. The Office for Personal Data Protection of the Slovak Republic is located at Námestie 1. mája, 811 06 Bratislava, Slovak Republic, and its contact information is as follows: tel. no. +421 2 3231 3214; email: statny.dozor@pdp.gov.sk; website: <https://dataprotection.gov.sk/>

If a complaint or proposal is submitted electronically, it must meet the requirements set forth in Section 19(1) of Act No. 71/1967 Coll. on Administrative Proceedings (Administrative Code), as amended.

Without prejudice to any other administrative or judicial remedies, you have the right to file a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work, or in the place where the alleged infringement occurred, if you believe that the processing of personal data concerning you is in violation of the GDPR. Information on how to contact supervisory authorities within the EU is available here: https://edpb.europa.eu/about-edpb/board/members_en. You will have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning you. In addition, you have the right to an effective judicial remedy if

the competent supervisory authority has not addressed your complaint or has not informed you within three months of the progress or outcome of your complaint. An action against a supervisory authority must be brought before the courts of the Member State in which the supervisory authority is established.

Without prejudice to any available administrative or non-judicial remedy, including the right to file a complaint with a supervisory authority, you shall have the right to an effective judicial remedy if you consider that your rights under the GDPR have been infringed as a result of the processing of your personal data in breach of the GDPR. An action against the Company, its affiliate, or a data processor shall be brought before the courts of the Member State in which the Company, or, where applicable, the affiliate or data processor, has its registered office. Such an action may also be brought before the courts of the Member State in which you have your habitual residence.

Data Breach Notification: In the event of a data breach involving your personal data that is likely to result in a high risk to your rights and freedoms, our Company is required to notify you of the data breach without undue delay.

Right to withdraw consent to the processing of personal data: If you have granted our Company consent to process certain personal data (the legal basis for our Company's processing of certain personal data is consent or explicit consent), you may withdraw such consent at any time by contacting our Company using the contact information provided.

We may update this Privacy Policy from time to time in response to changes in legal, technical, or business developments. When updating the Privacy Policy, we will take appropriate measures to inform you in advance in a suitable manner.