

## Conditions and information on personal data processing – Social networks

eGroup Solutions, a. s., Plynárenská 7/B, 821 09 Bratislava, CIN: 44 989 709, established in accordance with the legal regulations of the Slovak Republic, kept in the Commercial Register of the Municipal Court Bratislava III, Section Sa, Entry No. 4875/B ("eGroup Solutions, a.s." or "controller") as the controller obtains and processes personal data of data subjects, to whom it hereby provides information in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27.04.2016 on the protection of individuals with processing personal data and on the free movement of such data, repealing the Directive 95/46/EC ("GDPR") and with regard to the Act No. 18/2018Coll. on the protection of personal data and on the amendment of certain acts ("APPD").

The conditions and information on the processing of personal data ("PD") of the controller explain only the basic issues concerning the management of the controller's profiles. The operator has only typical administrator rights when processing your PD via their profiles on social networks. When using social networks, your PD are also processed by the providers of these social networks (e.g. Facebook, Instagram, Google, LinkedIn). We generally have no control over and are not responsible for this processing, the further provision of your PD to third parties and their cross-border transfers to third countries (which are carried out by taxed social network providers). We encourage you to familiarize yourself with the privacy terms of the providers of social media platforms through which we communicate. The controller shall only be responsible for the processing of your PD through social networks if they are directly involved in the processing as a joint controller (Facebook, Instagram, Google, LinkedIn statistical purposes) or as a controller using the services of an intermediary. The controller is only responsible for its own marketing activities and its own campaigns on its official social network profiles explaining these privacy terms.

### FACEBOOK AND INSTAGRAM AND ANOTHER SOCIAL MEDIA:

For social networks Instagram and Facebook, PD is processed by **Meta Platform Ireland Limited**, 4 Grand Canal, Port Grand Canal, Dublin 2 Ireland ("Facebook") as described in Facebook policy at <https://www.facebook.com/policy>, <https://help.instagram.com/519522125107875>. The controller would like to emphasize that in this case, user data can also be processed outside the European Union. This may result in risks for the user, for example enforcement of users' rights may be more difficult. However, Facebook has been subject to the EU-US Privacy Policy and agrees to comply with EU data protection standards (<https://www.facebook.com/help/56699466033381?ref=dp>). In the case of other social network providers, the controller acts similarly, and always chooses a social network for its official profiles, the controller of which guarantees compliance with EU standards and compliance with basic EU standards for privacy.

Unless otherwise stated in these conditions, for the purpose of "**social networks – profile management**", in principle, the controller is a special controller vis-à-vis social network controllers and a social network controller as a special controller.

Contrary to the above, the controller is in the position of an independent controller in relation to the controller of the social network Facebook for the purpose of "**social networks – profile management**" and the social network controller as an intermediary of the controller. For this purpose, the controller can use the services provided by Facebook, which are marked as ""**data file custom audiences**" – i.e. management of the audience for the implementation of advertising campaigns, in which case there may be a merger of PD processed by the controller with PD processed in Facebook databases, as well as services marked as "**measurement and analytics**" – i.e. services in which Facebook processes the PD on behalf of the controller in order to measure the performance and reach of the controller's advertising campaigns and provides the controller with reports of users who have seen and responded to the controller's advertising content placed on the controller's Facebook profiles. This processing of user accounts may occur if the user interacts with the controller's advertising content or the controller's website as part of the use of a user profile established on Facebook. In both cases, the controller is used by Facebook as an intermediary, and in this case the following legal guarantees apply to the processing of user accounts: <https://www.facebook.com/legal/terms/businessstools>, <https://www.facebook.com/legal/terms/dataprocessing>.

For the purpose of "**social networks – statistics**", the controller is a joint controller with Facebook. For this purpose, the controller may process data on users and their behaviour on social networks obtained through Facebook's social network providers for the purposes of market research and advertising. For example, from the behaviour of social network users, the so-called Usage profiles in which user interests are stored, regardless of the devices used by the users. Usage profiles can then be used to offer and display ads to a given user, the so-called personalized advertising. For these purposes, the so-called cookies, in which the user behaviour and interests of the user are stored. Under the purpose of "**social networks – statistics**", Facebook provides the controller as the owner and administrator of its official profiles on social networks (so-called fan page) statistics and information to such an extent that they can be considered PD, as these help the controller to gain an overview of action types that users perform on their sites (the "Site Information"). For the purpose of collecting and processing statistical data, the controller is a joint controller with Facebook, while the PD obtained for these purposes are processed on the basis of an agreement between the joint controllers between the controller and Facebook. The agreement is available here: [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum) and here <https://sk-sk.facebook.com/help/instagram/155833707900388>.

For information on how to proceed when the data subject's right is exercised and for more information on the conditions for processing personal data, see Facebook Instagram information at: <https://www.facebook.com/about/privacy/>, <https://www.facebook.com/settings?tab=ads> and <https://help.instagram.com/581066165581870?ref=dp> and for LinkedIn at <https://www.linkedin.com/legal/privacy-policy>. In the case of LinkedIn, the details or appropriate guarantees are detailed at: <https://www.linkedin.com/legal/dpa> <https://www.linkedin.com/legal/eu-sccs>.

You can contact the **Google** who processes your PD by following the steps listed at <https://policies.google.com/privacy> or <https://support.google.com/youtube/answer/2801895?hl=en>.

For other social networking providers, similar data is always displayed directly on their website in the section of basic documents, which are labelled as "Privacy" or "Cookies".

**Links:**

<https://www.facebook.com/eGroupSol>

[https://www.instagram.com/egroup\\_solutions/](https://www.instagram.com/egroup_solutions/)

<https://www.linkedin.com/company/egroup-solutions-a.s./>

[https://www.youtube.com/channel/UCUCntJLecbPiQNEt8XR4A/videos?app=desktop&view=0&sort=dd&shelf\\_id=0](https://www.youtube.com/channel/UCUCntJLecbPiQNEt8XR4A/videos?app=desktop&view=0&sort=dd&shelf_id=0)

The table below shows the purposes of processing the PD, from which the category of data subjects is clear, the legal basis for their processing, the categories of PD processed and the period when the controller will process the PD.

Categories of data subjects	Purpose of personal data processing	Legal basis for the processing of personal data	PD processing time	Recipients or category of recipients
Registered logged-in users, registered not logged-in users and non-registered users.	<p><b>SOCIAL NETWORKS – MANAGEMENT OF PROFILES ON SOCIAL NETWORKS, INCLUDING COMMUNICATION AND DISCUSSION WITH USERS (CORPORATE PROFILE OF SO CALLED FAN PAGE ON FACEBOOK AND OTHER SOC. NETWORKS)</b></p> <p><b>the purpose is to promote (direct and indirect marketing) and offer controller services on social networks, communicate with users and various accompanying activities through social networks, provide information to the wider public.</b></p>	<p><b>Article 6(1)(f) of the Regulation – LEGITIMATE INTEREST</b></p> <p>The following is a legitimate concern: The creation of an official controller profile on the relevant social network (the so-called "fan page"). The legitimate interest is promotion (direct and indirect marketing) and the provision of controller services on social networks, communication with users, organization of competitions and accompanying activities through social networks, provision of information to the wider public.</p>	<p>The data shall be stored until such time as they are no longer necessary for the provision of the services and products of the controller of the social network in question or until the user has removed his account, whichever occurs first. This is a case-by-case matter and depends, for example, on the nature of the data; the reason why they are collected and processed; and the relevant legal or operational storage needs.</p> <p>E.g. If a user searches for something on the social network Facebook, you can view your search at any time in your search history and delete it from there, but the record of this search will not be deleted until 6 months later. If e.g. the user sends a copy of their state-issued identification document to the operator of the social network Facebook for the purpose of verifying the account, this copy is deleted after 30 days from its sending.</p>	Entities to which the provision of PD results from law to the controller; professional consultants and advisers who are bound by legal and/or contractual obligation of confidentiality; in the case of "data file custom audiences" and "measurement and analytics" services, the controller of the social network Facebook is in the position of its intermediary towards the controller.
Persons exercising their rights as data subjects	<p><b>AGENDA FOR EXERCISE OF THE RIGHTS OF THE PERSON CONCERNED</b></p> <p>(Evidence of rights exercised by affected persons according to Chapter III Regulations 2016/679 on the protection of natural persons in the processing of personal data and on</p>	<p><b>Processing is within the meaning of Art. 6 par. 1 letter c) of the Regulation GDPR necessary for meeting the legal obligations of the controller arising from the Regulation and from the Act No. 18/2018 Coll. on the protection of</b></p>	5 years following the year in which the application was processed	Entities to which the controller provides PD by law, professional consultants and advisers who are bound by legal and/or contractual obligation of confidentiality

	the free movement of such data)	personal data.		
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The controller shall not disclose personal data to any third parties other than those required by law or these conditions of processing personal data. The controller does not transfer personal data to third countries (outside the European Union / European Economic Area); the transfer to a third country can be carried out by the operator of the social network. For more information see:

<https://www.facebook.com/about/privacy/>  
<https://www.facebook.com/settings?tab=ads>  
<https://help.instagram.com/581066165581870?ref=dp>  
<https://www.linkedin.com/legal/privacy-policy>  
<https://policies.google.com/technologies/retention?hl=sk->

The controller shall not process personal data for the purposes of automated decision making, including profiling.

In the event that for any of the purposes of processing, the contract is the legal basis for the processing of personal data, the provision of such data constitutes a contractual requirement for performance under the contract in question. In the absence of this information, it is not possible to enter into a contractual relationship or subsequent performance under the contract. If law is the legal basis for the processing of personal data, the provision of such data is a legal requirement. If this information is not provided, it is not possible to ensure proper meeting of controller's obligations arising from the relevant general legal regulations.

In relation to the processing of personal data, the data subject shall in particular have the following rights:

- 1) upon application, request from the controller confirmation of whether its PD are processed or not (**access to personal data**), under what conditions, including the scope, purpose and time of their processing and information on the source of the personal data concerned;
- 2) upon application, request from the controller correction of incorrect or outdated personal data, or completion of incomplete personal data;
- 3) upon application, request from the controller **erasure/destruction of personal data** if:
  - a) personal data are no longer needed for the purpose for which they were obtained or otherwise processed,
  - b) in cases where personal data have been processed on the basis of consent and this consent to the processing of personal data has been revoked, there is no other legal basis for the processing of personal data or another legal exception;
  - c) if the data subject objects to the processing of personal data on grounds of legitimate interest and there are no legitimate reasons for the processing or the data subject objects to direct marketing;
  - d) personal data are processed illegally;
  - e) personal data must be deleted in order to comply with the legal obligation;
- 4) upon application, request from the controller restrictions on the processing of personal data if:
  - a) the data subject objects to the accuracy of the personal data during the period allowing the controller to verify the accuracy of personal data;
  - b) the processing of personal data is illegal and the data subject objects to the deletion of personal data and calls instead for restrictions on their use;
  - c) The controller no longer needs personal data for the purpose of processing personal data, but the data subject needs it to assert a legal claim;
- 5) where personal data are processed on consent as a legal basis, it shall have the right to withdraw that consent;
- 6) **For reasons relating to its particular situation, object to the processing of personal data relating to it, which is carried out either (A) because of the necessity of a public-interest task or (B) on grounds of the legitimate interest of the controller in the processing of personal data, including the objection to profiling based on those legal bases (in cases, where the controller would perform profiling on the basis of automated decision-making);**
- 7) to file an application for the opening of proceedings at the Office for the protection of personal data of the Slovak Republic.

#### **The right to object to the processing of personal data**

You can object to the processing of your personal data, which is based on our legitimate interests, at any time, even without giving reasons. We have to properly assess the objection. If we do not prove that we have necessary legitimate reasons for processing your personal data and that these outweigh your interests, rights and freedoms, we will not process your personal data further.

You can send your objection in writing to the address: eGroup Solutions, a. s., Plynárenská 7/B, 821 09 Bratislava – mestská časť Ružinov or by e-mail at [dpo@egroup.sk](mailto:dpo@egroup.sk).

Applications for the above rights shall be made by the data subject entitled to its exercise at the responsible person at the address [dpo@egroup.sk](mailto:dpo@egroup.sk), or in person or by post at the address of the controller. The subject of both the e-mail and the letter should include the protection of personal data "Social networks".

Replies to those applications from the data subjects or measures taken on the basis of those applications shall be given free of charge. Where the application of the data subject is manifestly unfounded or disproportionate, in particular due to its repeated nature (repeated application), the controller has the right to charge a fee taking into account its administrative costs of providing

information or a reasonable fee taking into account its administrative costs of notification, or to take the requested action or has the right to refuse to act on such an application.

In case of doubt about compliance with the obligations related to the processing of personal data, you can directly contact the controller, i.e. the responsible person. At the same time, you have the opportunity to file a complaint with the Office for Personal Data Protection of the Slovak Republic, with the registered office at Park One, Námestie 1. mája 18, 811 06 Bratislava, e-mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk), www: <https://dataprotection.gov.sk/> .

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