

INFORMATION ON PERSONAL DATA PROCESSING

pursuant to Articles 12, 13, and 14 of GDPR (hereinafter referred to as the “Information”)

This Information describes how the data controller, **Aspect studio s. r. o.**, Company ID: 56 354 568, with its registered office at Lipová 2145/23, Ivanka pri Dunaji 900 28, registered in the Commercial Register of the Bratislava III District Court, Section: Sro, Insert Number: 179501/B (hereinafter referred to as the “Controller”), processes personal data. If any part of this Information is unclear or incomprehensible to you, we will be happy to explain any term or section. We process personal data in compliance with GDPR, Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments to Certain Acts, as amended, and other generally binding legal regulations.

1. BASIC TERMS

- a. Personal Data** – Any information relating to an identified or identifiable natural person, such as name, surname, date of birth, personal identification number, phone number, email address, IP address, etc.
- b. GDPR** – 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, and repealing Directive 95/46/EC (General Data Protection Regulation).
- c. Data Subject** – A natural person to whom the personal data relates.
- d. Processing of Personal Data** – Activities or processing operations carried out by the controller or processor with personal data.
- e. Controller** – A natural or legal person that determines the purpose and means of personal data processing.
- f. Purpose of Personal Data Processing** – A clearly defined or established intent of personal data processing related to a specific activity.
- g. Legitimate Interest** – The interest of the controller or a third party necessitating personal data processing, provided it does not override the interests or fundamental rights and freedoms of the data subject.
- h. Recipient** – A natural or legal person, public authority, agency, or other body to whom personal data is disclosed.

2. CONTROLLER OF PERSONAL DATA

The data controller is:

Controller:	Aspect studio s. r. o.
Legal Form:	Limited Liability Company (“s.r.o.”)

Address:	Lipová 2145/23, Ivanka pri Dunaji 900 28
Email:	maruska.magalova@gmail.com
Phone Number:	+421903423789

3. PURPOSES AND LEGAL BASES FOR PROCESSING

Purpose	Legal Basis
Accounting	Article 6(1)(c) GDPR – compliance with a legal obligation Article 6(1)(b) GDPR – performance of a contract
GDPR Compliance	Article 6(1)(c) GDPR – compliance with a legal obligation
Network and Other Security	Article 6(1)(f) GDPR – legitimate interest
Supplier/Customer Contracts	Article 6(1)(b) GDPR – performance of a contract Article 6(1)(f) GDPR – legitimate interest
Website (cookies)	Article 6(1)(f) GDPR – legitimate interest Article 6(1)(a) GDPR – consent of the data subject
Contact Form	Article 6(1)(f) GDPR – legitimate interest
WhatsApp Communication	Article 6(1)(f) GDPR – legitimate interest
Company Profile on Facebook	Article 6(1)(f) GDPR – legitimate interest
Company Profile on Instagram	Article 6(1)(f) GDPR – legitimate interest
Talent Database	Article 6(1)(a) GDPR – consent of the data subject

4. LEGITIMATE INTERESTS OF THE CONTROLLER OR THIRD PARTIES

Legitimate Interest	Description
Network and Other Security	Legitimate interest of the controller in ensuring security – a duty under GDPR to implement adequate security measures, including logging activities of entities accessing the controller’s environment.
Supplier/Customer Contracts	Legitimate interest of the controller and third parties (suppliers/customers) in fulfilling contracts.
WhatsApp Communication, Contact Form	Legitimate interest of the controller in processing personal data voluntarily provided by the data subjects for mutual communication purposes.
Website, Facebook Profile, Instagram Profile	Legitimate interest of the controller in raising awareness about its activities.

5. RECIPIENTS

A recipient is any person to whom the controller discloses personal data, regardless of whether they are a third party. Personal data processed by the controller, depending on the individual purposes of processing, may be disclosed to the following recipients:

- Persons who process personal data based on direct authorization by the controller (e.g., individuals working under agreements outside of employment relationships, etc.);
- Processors (e.g., web hosting providers, accounting service providers);
- Directors, producers, dramaturgs, cinematographers, other agencies;
- Public authorities (e.g., tax offices, Social Insurance Agency, Office of Labor, Social Affairs and Family, Office for Personal Data Protection, courts, law enforcement authorities, misdemeanor authorities, etc.);
- Health insurance companies, bailiffs, supplementary pension funds, pension management companies, employee representatives;
- Other authorized entities may also be recipients.

6. TRANSFER TO THIRD COUNTRIES AND INTERNATIONAL ORGANIZATIONS

The controller generally does not transfer personal data to countries outside the EU (EEA). A theoretical transfer to a third country may occur if the data subject visits/uses the controller’s corporate profiles on social networks such as Facebook and Instagram. In such cases, personal data may be transferred to the United States of America in accordance with the European Commission’s adequacy decision.

7. RETENTION PERIOD

We retain personal data in a form that allows identification for no longer than necessary to achieve the purposes for which the data is processed. Retention periods/deletion timelines or criteria for their determination are documented in records of processing activities, which we will provide upon request.

8. DATA SUBJECT RIGHTS

Data subjects have the following rights:

a) **Information about the processing of personal data**

The information includes the identity and contact details of the controller, purposes of processing, categories of personal data involved, recipients or categories of recipients, information about transfers to third countries, retention periods, authorized controllers, a summary of your rights, the possibility to contact the Slovak Data Protection Office, the source of the personal data, and information on whether and how automated decision-making and profiling are applied.

b) **Right to access personal data**

You have the right to confirmation of whether your personal data is being processed and, if so, access to information about the purposes of processing, categories of data involved, recipients, retention periods, your rights, the right to lodge a complaint with the Data Protection Office, the source of the data, whether automated decision-making and profiling occur, and information and safeguards regarding transfers to third countries or international organizations. You also have the right to a copy of the personal data being processed.

c) **Right to rectification**

Data subjects have the right to correct inaccurate personal data. Considering the purposes of processing, data subjects also have the right to supplement incomplete personal data, including by providing an additional statement.

d) **Right to erasure (Right to be forgotten)**

In certain legally defined cases, we are obligated to erase personal data of the data subject. However, each request is subject to individual evaluation to determine whether the conditions are met, as the controller may be bound by legal obligations or process data based on legitimate interests. If our legitimate interest (or the legitimate interest of a third party) outweighs the interests of the data subject, we may continue processing the data for the specified purpose.

e) **Right to restriction of processing**

The data subject may request the controller to restrict the processing of personal data if any of the following situations occur:

- i) The data subject disputes the accuracy of personal data, for the time necessary for the controller to verify the accuracy of the data;
- ii) The processing of personal data is unlawful, but the data subject refuses the erasure of the data and instead requests restriction of its use;

- iii) The controller no longer needs the personal data for processing purposes, but the data subject requires it for the establishment, exercise, or defense of legal claims;
 - iv) The data subject objects to the processing of personal data in specific situations under GDPR (e.g., public interest tasks, the controller's legitimate interest, or profiling), until it is verified that the controller's legitimate interests override those of the data subject.
- f) **Right to data portability**
Upon request, we will transfer personal data to another controller in an appropriate format, provided no legal or other significant barriers prevent us from doing so.
- g) **Right to object and automated individual decision-making**
The data subject has the right to object at any time to the processing of personal data on the legal basis of public interest or legitimate interest. The data subject may also object at any time to the processing of personal data for direct marketing purposes, including profiling related to such direct marketing.
- h) **Processing based on consent (Right to withdraw consent)**
If processing is based on the data subject's consent under Article 6(1)(a) GDPR or Article 9(1)(a) GDPR, data subjects have the right to withdraw their consent at any time. Such withdrawal does not affect the legality of processing based on consent before its withdrawal.
- i) **Right to lodge a proposal, submission, or complaint with the supervisory authority**
Data subjects can address proposals, submissions, or complaints regarding personal data processing to the Slovak Data Protection Office, located at Hraničná 12, 820 07 Bratislava 27, Slovak Republic. Telephone: +421/2/3231 3220. Website: www.uoou.sk.

Response period

We will provide a statement and, if applicable, information on measures taken as soon as possible, but no later than one month. If necessary, given the complexity and number of requests, the period may be extended by two months. We will inform the data subject of any extension, including reasons.

Contact point

Data subjects may exercise their rights by emailing maruska.magalova@gmail.com or writing to the correspondence address: **Aspect Studio s. r. o., Lipová 2145/23, Ivanka pri Dunaji 900 28, Slovak Republic.**

Notifications and statements regarding the exercised rights are provided free of charge. However, if a request is clearly unfounded or excessive, particularly due to repetition, we may charge a reasonable fee considering administrative costs or refuse to act on the request.

9. PROVISION OF PERSONAL DATA

Providing personal data is voluntary. Since we are a private legal entity, providing your data to us as the controller is not a legal requirement. If you are interested in entering into a contract with us, providing personal data may be necessary for contract conclusion. In such cases, providing the data is a contractual requirement.

The data subject is not obligated to provide their personal data; it is provided voluntarily. Refusing to provide personal data does not negatively impact the data subject.

10. AUTOMATED DECISION-MAKING AND PROFILING

The controller does not use automated individual decision-making, including profiling.

11. PROCESSING FOR ANOTHER PURPOSE

We respect the principle of purpose limitation when processing data, meaning that data is processed only for specific, explicitly stated, and legitimate purposes, except in cases where the processing is for a compatible purpose. Processing for another purpose can also be based on the consent of the data subject, or as per the law of the European Union or the Slovak Republic.

To determine whether another purpose is compatible with the original purpose for which the personal data was obtained, we conduct a compatibility test before starting the processing. This test considers:

- a) any connection between the purposes for which the personal data was collected and the intended new purposes;
- b) the circumstances under which the personal data was collected, particularly regarding the relationship between the data subjects and the controller;
- c) the nature of the personal data, particularly if special categories of personal data under Article 9 of the GDPR or personal data related to criminal convictions and offenses under Article 10 of the GDPR are being processed;
- d) the possible consequences of the intended further processing for the data subjects;
- e) the existence of appropriate safeguards, such as encryption or pseudonymization.

12. OVERVIEW OF SELECTED LEGAL REGULATIONS ON DATA PROTECTION

- Charter of Fundamental Rights of the European Union (Article 8)
- 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 (General Data Protection Regulation, GDPR), repealing Directive 95/46/EC
- Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications) (consolidated version)
- Act No. 351/2011 Coll. on Electronic Communications, as amended
- Constitution of the Slovak Republic (published under No. 460/1992 Coll.)
- Act No. 18/2018 Coll. on Personal Data Protection and on Amendments and Supplements to Certain Acts, as amended
- Decree No. 158/2018 Coll. of the Office for Personal Data Protection of the Slovak Republic on the procedure for assessing the impact on personal data protection

13. CHANGES TO PERSONAL DATA PROCESSING RULES

We reserve the right to change these personal data processing rules, particularly to incorporate legislative changes or changes in the purposes and means of processing. If changes are made to the rules that may affect the rights of data subjects, we will notify them in an appropriate manner and with sufficient notice.

This document is regularly updated.

Last update: 10 December 2024