

PROTECTION OF PERSONAL DATA

CVS Mobile, informacijske rešitve, d.d., (hereinafter CVS Mobile) advocates the respect of fundamental rights and takes particular care with the protection of personal data and its processing.

CVS Mobile is committed to ensuring safe and confidential processing of the personal data of its employees, shareholders, contracting parties and other interested persons, while at the same time making sure that the personal data is processed in a legal, fair and transparent manner – with respect for the rights of the individual.

Personal Data Protection Policy

To implement its commitments, CVS Mobile has adopted a new Personal Data Protection Regulation in conformity with the General Data Protection Regulation (GDPR – Regulation (EU) 2016/679 of the European Parliament and of the Council) and other applicable legislation. Alongside some other internal act and measures, the Regulation represents the policy of the CVS Mobile Company which ensures that personal data will be collected and processed for specific purposes and only in the absolute minimum, as well as stored only for the length of time necessary for the fulfilment of the purpose for which it was collected.

Scope

Our policy applies to all people who provide us with any personal information: CVS Mobile employees, employment candidates, shareholders, buyers, suppliers etc.

Who is bound by the policy

Generally, the policy binds anyone who works with us or who operates on our behalf and occasionally may need access to personal data. All employees of CVS Mobile and its subsidiaries, as well as contractors, consultants and other external personal data processors must comply with it.

Elements of the policy

In order to implement our processes, we must obtain and process personal data. This includes any information allowing the identification of a person, such as names, addresses, user names and passwords, digital prints, photographs, personal identification document numbers, financial data, etc.

The company collects this information in a transparent manner and only with the full cooperation and awareness of the interested parties. Once this information is obtained, the following rules apply:

Our data will:

- be collected fairly and only for legitimate purposes,
- accurate and up-to-date,
- processed within legal and moral boundaries,
- protected from any and all unauthorised or illegal access by internal and external parties.

Our data will not:

- be informally transmitted,
- stored over a certain time,
- transferred to organizations or countries with no appropriate regulations on data protection,
- transferred to parties that the owner of the data did not agree to (excepting lawful requests from law enforcement authorities).

In addition to the proper handling of data, CVS Mobile has direct obligations to the people the data belongs to. In accordance with the General Data Protection Regulation and other applicable legislation in the area of personal data protection, CVS Mobile will, among others:

- provide to every interested party a full account of which personal data is being collected and for what purpose, how long it is stored, whether it is transmitted to anyone, etc.;
- provide to every interested party the option to correct their inaccurate data;
- erase all personal data where erasure conditions have been met, e.g. if you have withdrawn your consent;
- implement procedures in case of lost, damaged or compromised data.

Activities

In order to protect personal data, we undertake to perform activities such as:

- restricting and controlling access to special kinds of personal data;

- developing and performing transparent procedures for data collection;
- training of employees to perform personal and technical security measures;
- establishing a secure network for the protection of personal data against cyber-attacks;
- establishing clear procedures for privacy breaches or data misuse notifications;
- incorporating contractual clauses or clear instructions on how we process personal data;
- establishing good data protection practices (clear desk and clear screen policy, document shredding, secure locking, data encryption, frequent backup, authorisation to access, etc.).

Disciplinary consequences

CVS Mobile employees must strictly adhere to all the principles described in this policy. Infringement of data protection rules may result in disciplinary and other measures.