

PRINCIPLES OF PERSONAL DATA PROTECTION

Properly processing your personal data is very important to our company, and protection of such data is a matter of course for us. Therefore, we want to provide you with detailed information about why we process your personal data and your children's data, what reasons we have for doing so, what rights you have in relation to the processing of personal data and other related information.

If after reading this document anything remains unclear to you or you are unsure of anything, we will be happy to explain any term or part of this document to you. In these cases you can turn to us in writing at the e-mail address citygastro@citygastro.sk or at the address CITY GASTRO s.r.o., Račianska 71, Bratislava 831 02.

1. Who is the controller of your personal data?

The **controller** of personal data is always the company to which personal data was offered and which determines the purpose and means of processing the personal data.

The controller of personal data is the company **CITY GASTRO s.r.o.**, with registered seat at Račianska 71, Bratislava 831 02, Company ID: 46 323 279, recorded in the commercial register of District Court Bratislava I, division: Sro, file no. 75649/B (further only "**CITY GASTRO**").

You can exercise your right by **written postal** or **e-mail** at these points of contact:

Contact:	CITY GASTRO s.r.o.
Address:	Račianska 71, Bratislava 831 02
E-mail:	citygastro@citygastro.sk

The controller has a responsible person assigned, which in our case is the company **Avris Consulting, s.r.o.**, with registered seat at Kutlíková 17, Bratislava 852 50, Company ID: 35 962 844, recorded in the commercial register of District Court Bratislava I, division: Sro, file no. 38168/B:

Contact: gdpr@avris.sk

(further only the "**responsible person**")

2. What does the processing of personal data mean and what terms are connected with the processing?

Personal data – any information relating to an identified or identifiable natural person, for example, a name, surname, date of birth, telephone number, e-mail address and so on.

Data subject – the natural person to which the personal data is related.

Processing of personal data – activities which the controller or an intermediary perform with the personal data.

Controller – a natural person or legal entity which determines the purpose and means of processing personal data; the controller may entrust an intermediary with processing.

Intermediary – a natural person or legal entity, public authority, agency or other subject which processes personal data on behalf of the controller.

Responsible person – a natural person or legal entity designated by the controller or intermediary for performing activities associated with the protection of personal data.

Purpose – the reason why the controller processes personal data.

Special categories of personal data – sensitive personal data which has a specific character, such as, e.g. data on health status, like the food intolerance of a child or teacher.

Legitimate interest – the interest of the controller or another subject from which the need to process personal data follows, if it does not outweigh the interests of the data subject, e.g. when the

controller offers services to the data subject on the basis of a contract with another subject, in this case on the basis of a contract with the British International School Bratislava.

Profiling – any automatic processing of personal data which is used with the aim of evaluating specific personal conditions, e.g. behaviour on the Internet.

Technical cookies – small data files that are stored in a special browser folder on a user's computer and are essential for certain Web site features, such as logging in; cookies can be disabled in most Internet browsers. Cookies do not represent a danger, but they are important for privacy. Cookies cannot be used to identify visitors to the site or to abuse login information.

Recipient – a natural person, legal entity, organ of public authority or another subject to which personal data are provided but not processed.

Service – the provision of dining and services associated with it for students, teachers and other employees of the British International School Bratislava.

Client – a natural person who uses the services of the controller, especially a student, teacher and other employee of the British International School Bratislava.

3. What kind of personal data do we process?

We only process personal information in order to provide our services and customer support and to comply with our legal obligations, as well as to protect your rights and our own legitimate interests.

We collect personal information about clients who use our services on the basis of a contractual relationship with the British International School Bratislava ("BIS").

In particular, we process these categories of personal data:

General categories of personal data:

Basic identification data

We need basic identification data for the purpose of registering a client or his/her legal representative for the proper provision of our services. This is the address, name, surname and billing address of the student's legal representative; the name, surname, date of birth and year of student; the address, name, surname and date of birth of teacher and other BIS employees.

Contact data

Contact data includes the e-mail address and telephone number of the legal representative of a BIS student.

Information on preferences

This is in particular the labelling of unsuitable foods without stating a reason, such as, e.g., some types of meat, seafood, the combination of some foods, milk products, eggs, etc., so that we can adapt meals as much as possible to suit the needs of a specific client.

Information on the amount of food issued to teachers and other BIS employees

We process and disclose information to BIS on the amount of food delivered to individual teachers and other BIS employees for the purpose of reimbursing this service by BIS to the controller, as the service provider for its teachers and other staff.

Transaction data

This is exclusively about information for the purposes of payment for our services, namely the IBAN and billing address of the legal representative of a BIS student and other information on payments made for our services.

Special categories of personal data relating to health:

Information on food intolerances

We process such data only if you stated in your registration form for the purpose of modifying meals in line with this intolerance and you granted us explicit consent to process them.

4. For what purposes do we process personal data?

We process personal data:

- without requiring your consent,
- with your consent.

Processing without requiring your consent:

Processing on the basis of legitimate interests:

The legitimate interests of CITY GASTRO are:

- registration of a client and his/her dining preferences through a registration form on the controller's Web page;
- using technical cookies for proper functioning of the Web page;
- defending of legal claims.

The controller, in the scope of its legitimate interest, performed a **test of proportionality**, which confirmed that the processing of these personal data in its legitimate interest does not outweigh the fundamental rights and freedoms of the data subjects. You'll find the test of proportionality [HERE](#).

Processing for statistical purposes

After the end of your contract and the time for which we preserve personal data, personal data are further processed for statistical purposes and always in an anonymised form.

Processing with your consent:

Processing for the purpose of modifying food due to a food intolerance

We process personal data on a food intolerance for the purpose of modifying meals in accordance with these intolerances.

The provided consent is completely voluntary, but it is essential for us to be able to adjust your food accordingly. We cannot not do so without this information and your consent.

You may revoke your consent, including partially, at any time in writing by **post** or by **e-mail** at these contacts:

Contact:	CITY GASTRO s.r.o.
Address:	Račianska 71, Bratislava 831 02
E-mail:	citygastro@citygastro.sk

5. How long do we keep your personal data?

We process **personal data of students' legal representatives** for the period of provision of our services, and after the end of such provision and settlement of all obligations related to the service, we keep them for a necessary time, a period of **10 years**, which is required by the relevant legislation. The period for keeping personal data results mainly from Act No. 431/2002 Coll. on Accounting, as amended.

We process the **general data of students, teachers and other BIS employees** for the period of providing our services and after the end of such provision, we keep them for the following three years. The termination of the provision of services is considered to be the non-use of the controller's services for more than 6 months.

If you gave CITY GASTRO permission to process your **personal data related to health** for the purpose of meal modification due to food intolerance, this consent shall endure for entire period of our services or until the time you withdraw your consent or the end of the food intolerance, if this inform us in writing of such cases. These personal data are no longer stored after this period.

6. Where do we obtain personal data?

We obtain personal data:

- directly from you when filling out the registration form on the controller's Web page;
- from other persons to whom you gave consent or who have legal authorisation (e.g. the legal guardian of a student).

7. How can you withdraw consent with the processing of personal data?

Consent with the processing of personal data relating to health for the purpose of dietary adjustment in line with food intolerances is done on a **voluntary** basis. This means you can **withdraw it at any time**. We will fully respect your decision and will discard data on your food intolerance. From this moment on, we will not modify your diet in line with this intolerance, as we will no longer have this data available.

What should the withdrawal of consent contain?

- Who is submitting the appeal. Please provide your name and surname.
- Explicitly state that you do no longer want us to process your personal data for the purpose of dietary adjustment in accordance with food intolerances.
- Address the withdrawal to the company to CITY GASTRO.

How can you send a withdrawal?

You can withdraw your consent by postal mail or e-mail.

8. Do we use automated processing of your personal data?

We are happy to inform you that in providing our services we do not use so-called profiling or automated processing.

9. What rights do you have in relation to the processing of your personal data?

With the processing of personal data you can exercise these rights:

Information on the processing your personal data

The information in particular consists of the identity and contact details of the controller; the purposes of the processing, the categories of the relevant personal data; the recipient or categories of recipients of personal data; information on the transfer of personal data to third countries; retention period of personal data; authorised controllers; the calculating of your rights; the opportunity to contact the Data Protection Office; the source of personal data being processed; information on whether and how automated decision making and profiling occurs.

Right to access personal data

You have the right to confirm whether or not personal data are processed and, if yes, then you have the right to access information about the purposes of their processing; categories of the personal data concerned; recipients or categories of recipients; retention periods of personal data;

information about your rights; the right to submit a complaint with the Data Protection Office; information on the source of the personal data; information on whether there is automated decision-making and profiling; information and guarantees in the case of transfer of personal data to a third country or international organization. You have the right to provide copies of personal data processed.

Right of repair

Are we processing your outdated or inaccurate personal information? For example, have you changed your e-mail address? Please let us know and we will correct your personal information.

Right for deletion (right to be forgotten)

In some legally stipulated cases, we are obligated to delete your personal information on your instructions. However, each such request is subject to an individual assessment about whether the conditions are met, because, for example, CITY GASTRO may have the obligation or the legitimate interest to keep data if it does not override your interests.

Right to restrict processing

If you wish us to process your personal data solely for the necessary legal reasons or to block personal data.

Right to data portability

If you wish to provide your personal information to another controller or another company, we will pass on your personal information in the appropriate format, provided that no legal or other significant obstacles prevent us from doing so.

Right to dispute automated individual decision-making

If you find out or think that we are processing personal data in violation of your private and personal life or in violation of legal provisions, please contact us for an explanation or to eliminate any such inappropriate status. You can also object directly against automated decision-making.

Right to submit a suggestion or file a complaint at the Office for Personal Data Protection

You may at any time contact us with a suggestion or a complaint regarding the processing of personal data to the supervisory authority, namely the Office for Personal Data Protection of the Slovak Republic, with registered seat at Hraničná 12, 820 07 Bratislava 27, Slovak Republic, ID no.: 36 064 220, tel. no.: +421/2/3231 3220, Web page <https://dataprotection.gov.sk/uoou/>

10. Where can you exercise your rights and is there a charge for doing so?

You can exercise individual rights at CITY GASTRO s.r.o., namely at the e-mail address citygastro@citygastro.sk or in written form at the address Račianska 71, Bratislava 831 02.

We will provide all notices and statements of your rights free of charge. If, however, the request is clearly unfounded or disproportionate, in particular because it is repeated, we are authorised to charge a reasonable fee, taking into account the administrative costs of providing the information requested. In the case of repeated request for a copy of personal data processed, we reserve the right to charge a reasonable administrative fee.

How long can you expect to wait for an answer?

We will provide a statement and, where appropriate, information on the measures taken, as soon as possible, but no later than one month. We are authorised to extend the deadline, if necessary, and

due to the complexity and number of applications, by two months. We will inform you about the extension of the deadline, including the reason.

11. Who has access to your data?

The controller, its employees and the responsible person have access to personal data, and contracted agents, especially accountants and BIS may also have access.

This involves in particular an external company that manages our accounting and thus the processing of some personal data, in particular transaction data. In the case of teachers and other BIS employees, these are data on the consumption of food for the purpose of paying for their diet by BIS.

We have a personal data processing contract with these intermediaries, and they are also bound to observe strict rules on the protection of personal data, including confidentiality, in order to comply with the highest standards of legal protection that corresponds to valid legal requirements in the Slovak Republic.

12. Overview of selected legal provisions regulating the issue of personal data

European framework:

- Charter of Fundamental Rights of the EUROPEAN UNION
- Regulation EU 2016/679 of the European Parliament and of the Council from 27 April 2016 on the Protection of Natural Persons and on the Free Movement of Such Data, repealing Directive 95/46/EC (General Data Protection Regulation, GDPR)

National legislation:

- Constitution of the Slovak Republic (published under No. 460/1992 Coll.)
- Act No. 18/2018 Coll. on the Protection of Personal Data and on changes and supplements to certain acts, as amended

13. Where can you contact us?

If you have any questions or comments about this information obligation, don't hesitate to contact us at any time, in writing by **e-mail** at the address citygastro@citygastro.sk or by **postal mail** to the address CITY GASTRO s.r.o., Račianska 71, Bratislava 831 02.

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