

## **PRIVACY POLICY AT ŽELEZNIČNÁ SPOLOČNOSŤ CARGO SLOVAKIA, A. S.**

### **Information obligation – Principles of personal data processing in the company**

The business company Železničná spoločnosť Cargo Slovakia, a. s. (hereinafter referred to as “ZSSK CARGO”) processes personal data in accordance with 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), and in accordance with Act No. 18/2018 Coll. on Personal Data Protection and on Amendments and Supplements to Certain Acts.

In order to comply with its information obligation, as well as to provide the data subjects with further information on the processing of their personal data by ZSSK CARGO, ZSSK CARGO has issued this document describing its privacy policy. ZSSK CARGO will transparently publish the **Privacy Policy** on its intranet and its website so that the data subjects have easy and permanent access to it.

#### **1. ZSSK CARGO as the controller and its contact data:**

The controller who processes your personal data is Železničná spoločnosť Cargo Slovakia, a. s., having its registered office at Tomášikova 28B, 821 01 Bratislava, Corporate ID No.: 35 914 921.

ZSSK CARGO provides reliable, safe and environmentally friendly rail freight services tailored to the needs and requirements of customers. Besides additional services directly related to freight and combined transport, ZSSK CARGO also provides, as its second major product, services related to the lease, maintenance and repairs of rolling stock.

You can contact our company using the following contact data:

e-mail address: Cargo.GR@zscargo.sk or on the phone number: +421 2 2029 7776.

#### **2. Contact person**

In order to ensure the protection of personal data, ZSSK CARGO has appointed a data protection officer for the controller:

Name and surname: Mgr. Emília Pistová

Address for delivery of notices: Železničná spoločnosť Cargo Slovakia, a.s.

E-mail address: dpo@zscargo.sk

Phone: +421 907 109 215

#### **3. Legal basis for personal data processing**

Your personal data are processed on the basis of:

- compliance with the legal obligation of the controller – special legal regulations and purposes determined by the controller under the General Data Protection Regulation (“GDPR” or the “Regulation”),
- on the basis of the consent of the data subject,
- on the basis of the performance of obligations arising from contracts where one of the parties is the data subject,
- on the basis of imperative reasons of public interest,
- on the basis of legitimate interest:
  - keeping minutes and materials from management meetings – the legitimate interest of ZSSK CARGO as the controller, which is to ensure keeping records of materials from the controller’s management meetings that are subsequently reflected in the controller’s business activities,
  - keeping minutes of meetings of individual organisational units – the legitimate interest of ZSSK CARGO as the controller, which is to ensure keeping records of materials from meetings of the heads of the controller’s organisational units that are subsequently reflected in the controller’s business activities,
  - conducting video conferences and video training sessions via the Teams application – the legitimate interest of ZSSK CARGO as the controller, which is to ensure video conferences and training sessions are provided for its employees and contractual clients in times of emergency and home-office work,
  - keeping ZSSK CARGO plans (annual) – the legitimate interest of ZSSK CARGO as the controller to draw up marketing, business, financial, investment and contingency plans for the development of the company,
  - maintaining the integrated management system – certified products (ISO 9001, OHSAS 18001) – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the quality of its services and engaging in the business of rail freight and to ensure the certification of its products with a view to enhancing the sale of its services to its customers,
  - keeping project management documentation – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the technical and practical part of the implemented internal business projects,
  - keeping documentation of third-party directives and instructions – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the proper and efficient provision of rail freight services for its contractual clients,
  - keeping records of contact persons and authorised persons arising from contractual relations – the legitimate interest of ZSSK CARGO as the controller, which is to ensure communication with contact and authorised persons arising from contractual relations,
  - keeping personal data of statutory bodies of contractual clients from publicly available registers - the legitimate interest of ZSSK CARGO as the controller, which aims to ensure the accuracy of data of statutory bodies from contractual relationships,
  - keeping trade secret documentation – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the protection of its trade secrets,

- keeping records of persons entering buildings and keeping records of one-time entry permits for external persons – the legitimate interest of ZSSK CARGO as the controller to monitor the controlled movement of persons on the ZSSK CARGO premises, the security of its employees and protection of its property,
- electronic keys (chip cards) of employees on the premises of the employer – the controller's registered office at Tomášikova 28B, Bratislava – the legitimate interest of ZSSK CARGO as the controller to monitor the controlled movement of persons on the ZSSK CARGO premises, the security of its employees and the protection of its property,
- keeping property protection documentation – the legitimate interest of ZSSK CARGO as the controller to monitor the security of its employees and the protection of its property,
- keeping records of employee cards and permits with authorisation – the legitimate interest of ZSSK CARGO as the controller to monitor the controlled movement of persons on the ZSSK CARGO premises, the security of its employees and the protection of its property,
- keeping documentation concerning the organisation of international negotiations in Slovakia – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the organisation of international negotiations in Slovakia with potential customers concerning the provision of rail freight services,
- keeping guidelines for the implementation of international relations – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the implementation of international relations with potential customers concerning the provision of rail freight services,
- delivering forms, documents and communications of a notification and informative nature to employees via a private e-mail box – the legitimate interest of ZSSK CARGO as the controller, which is to ensure that employees are notified via a private e-mail box of occupational information as not all the employees have been assigned a unique e-mail box,
- benefits for employees for recreational and sports activities - MultiSport card - legitimate interest of ZSSK CARGO as the controller that processes personal data in order to enable the employee to use the benefits offered by the MultiSport card, i.e. the controller provides an employee benefit for recreational purposes, providing benefits for employees and maintaining the good name of the employer
- keeping ZSSK CARGO employee awards documentation – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the moral appraisal of the work results of individual employees who, through their work and performance of tasks, have significantly contributed to the development of rail freight transport,
- keeping records of employee education and training in an e-learning manner through an information system – the legitimate interest of ZSSK CARGO as the controller, which is to ensure streamlining and speeding up the training of employees in the field of fulfilling occupational duties online,

- keeping documentation for the analysis of the efficiency of the means of production at ZSSK CARGO – monitoring the productivity of locomotives and wagons in selected professions at ZSSK CARGO – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the analysis of the efficiency of the means of production, monitoring the productivity of locomotives and wagons in selected professions, which is subsequently reflected in the controller's business activities,
- keeping documentation of communication with authors of licences, complaints, SW modifications – the legitimate interest of ZSSK CARGO as the controller, which is to ensure more efficient protection of information systems and programs and more efficient communication with suppliers of information systems and computer programs,
- keeping annual and multi-year information systems development concept and policy documentation – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the modernisation and new concept of information systems in the company for several years,
- keeping SICT requests documentation – the legitimate interest of ZSSK CARGO, which is to ensure the registration and handling of ZSSK CARGO employee requests for software and hardware in connection with the provision of functionality support and the provision of operational processes at executive workplaces,
- keeping SICT changes and modifications documentation – the legitimate interest of ZSSK CARGO, which is to ensure the protection, functionality and security of its information systems, applications and end user devices,
- keeping service requests and requirements (for transport, services, road haulage, purchase, procurement, ...) - the legitimate interest of ZSSK CARGO as the controller, which is to ensure control and authorisation for the use of means of transport and accommodating the need for the procurement of goods and services,
- keeping documentation of overviews and press clippings, photographic, film and sound materials relating to the company – the legitimate interest of ZSSK CARGO as the controller, which is to ensure historical information regarding the business activities of the controller and its functioning in rail freight as a state-owned enterprise,
- keeping documentation of advertising publications about the company (in one copy) and promotional activities – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the marketing and promotional purposes of the controller and provide historical information regarding the controller's engaging in the business of rail freight as a state-owned enterprise,
- keeping media and periodical press monitoring documentation – the legitimate interest of ZSSK CARGO as the controller, which is to ensure knowledge of information concerning the rail freight market,
- keeping the ZSSK CARGO magazine – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the controller's marketing and promotional purposes and provide historical information regarding the

- controller's business activities and its functioning in rail freight as a state-owned enterprise that has historical significance for the Slovak Republic,
- keeping trade fairs and exhibitions participation documentation – the legitimate interest of ZSSK CARGO as the controller, which is to ensure information about rail freight innovation trade fairs and exhibitions at which the controller takes part,
  - social networks - managing profiles on social networks, including communication and discussion with users for the purpose of promoting and offering services on social networks, communication with users, promotion of accompanying activities through social networks, providing information to the general public (company profile, the so-called fan page on Facebook, Instagram) - the legitimate interest of ZSSK CARGO as the controller is to create an official profile on the relevant social network (the so-called fan page). The legitimate interest is promotion (direct and indirect marketing) and presentation of activities and the offer of services on social networks, communication with users, organising accompanying activities through social networks, providing information to the general public,
  - social networks - statistical purposes - legitimate interest - this includes the processing of statistical data, which in some cases can be assigned to a specific data subject. For a more detailed explanation, we refer to Recital 50 of the GDPR, according to which “the processing of personal data for purposes other than those for which the personal data were initially collected should be allowed only where the processing is compatible with the purposes for which the personal data were initially collected. In such a case, no legal basis separate from that which allowed the collection of the personal data is required. Further processing for statistical purposes should be considered to be compatible lawful processing operations.” - the legitimate interest of ZSSK CARGO as the controller to collect personal data on legal basis of the original purpose and their subsequent processing for statistical purposes for the use of the Facebook and Instagram networks in accordance with the regime according to Article 89 of the GDPR. The legitimate interest is the collection and processing of several data, especially demographic data of the target group such as data related to the age, gender, marital status, occupation, lifestyle and interests of visitors to the fan page, as well as information regarding their online purchases and categories of purchased products and services, or geographic data. ZSSK CARGO has set parameters, among other things, according to its target group, as well as the goals of managing or supporting its activities, which affects the processing of personal data for the purpose of compiling statistics obtained on the basis of visits to the fan page. In the case of Facebook and Instagram, ZSSK CARGO can use the filters provided by Facebook to define the criteria on the basis of which these statistics are to be compiled and also define the categories of persons whose personal data will be used by Facebook. ZSSK CARGO, as the owner and administrator of the fan page located on Facebook and Instagram, therefore contributes to the processing of personal data of visitors to its page. All this information allows ZSSK CARGO to determine the profile of visitors who positively evaluate its fan page, or who

- use its applications, with a view to offering them more relevant content and developing functionalities that these visitors might take a greater interest in,
- keeping records of contact and authorised persons arising from contractual relations (Finstat) – the legitimate interest of ZSSK CARGO as the controller, which is to ensure communication with contact and authorised persons arising from contractual relations,
  - keeping real estate lease documentation – the legitimate interest of ZSSK CARGO as the controller, which is to ensure efficiency in the use of its own real estate and leased real estate,
  - keeping real estate management documentation – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the protection of its title to real estate,
  - monitoring the end user workstations of ZSSK CARGO employees via the DLP (Data Loss Prevention) system – monitoring the end user workstations (hereinafter referred to as “Workstations”) of ZSSK CARGO employees (i) to ensure the protection and security of ZSSK CARGO property and the property of third parties entrusted to ZSSK CARGO, the protection of the financial interests of ZSSK CARGO, the prevention of any leak or unauthorised handling of the personal data of data subjects or classified information, the protection of other rights and legitimate interests of ZSSK CARGO or those of third parties and the prevention of damage; (ii) to ensure the control of the performance of the occupational duties of employees within their employment relationships and the observance of work discipline, including the control of the effective use of working time by the employees of ZSSK CARGO, with respect to the special nature of the activities of ZSSK CARGO, and the processing pursuant to this paragraph shall be carried out by processing the Workstation records, which include, for example, information on the use of Workstations, applications, websites, connected devices, e-mails, printing, network traffic, file operations, and so on,
  - the video monitoring of the ZSSK CARGO premises and compounds (wagons repair workshops, pumping stations, locomotive depots) – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the security of its employees and other persons on the ZSSK CARGO premises, as well as to protect its property and the property of third parties, to protect the health of persons on the monitored premises, to protect the financial interests of ZSSK CARGO, to prevent any leak of classified information, to strengthen ZSSK CARGO’s position within the complaint procedure, to protect the other rights and legitimate interests of ZSSK CARGO or those of third parties, as well as to prevent damage and to ensure the protection of public order and security, Article 6(1)(c) of the GDPR, Act No. 301/2005 Coll. the Criminal Code, as amended, Act No. 372/1990 Coll. on Misdemeanours, as amended, and other related legislation,
  - the video monitoring of the ZSSK CARGO premises and compounds (portal ramp – cranes – Čierna nad Tisou) – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the security of its employees and other persons on the ZSSK CARGO premises, as well as to protect its property and the property of third parties, to protect the health of persons on the

- monitored premises, to protect the financial interests of ZSSK CARGO, to prevent any leak of classified information, to strengthen ZSSK CARGO's position within the complaint procedure, to protect the other rights and legitimate interests of ZSSK CARGO or those of third parties, as well as to prevent damage and to ensure the protection of public order and security, Article 6(1)(c) of the GDPR, Act No. 301/2005 Coll. the Criminal Code, as amended, Act No. 372/1990 Coll. on Misdemeanours, as amended, and other related legislation,
- the video monitoring of the ZSSK CARGO premises and compounds (Zvolen locomotive depot) – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the security of its employees and other persons on the ZSSK CARGO premises, as well as to protect its property and the property of third parties, to protect the health of persons on the monitored premises, to protect the financial interests of ZSSK CARGO, to prevent any leak of classified information, to strengthen ZSSK CARGO's position within the complaint procedure, to protect the other rights and legitimate interests of ZSSK CARGO or those of third parties, as well as to prevent damage and to ensure the protection of public order and security, Article 6(1)(c) of the GDPR, Act No. 301/2005 Coll. the Criminal Code, as amended, Act No. 372/1990 Coll. on Misdemeanours, as amended, and other related legislation,
  - the video monitoring of persons on the controller's monitored premises in connection with the monitoring of the ZSSK CARGO premises – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the control of the performance of the occupational duties of employees and observance of work discipline, including the control of the effective use of working time by ZSSK CARGO employees, carrying out supervision of compliance with occupational health and safety regulations and thereto-related prevention, Article 6(1)(c) of the GDPR, Section 13(4) of the Labour Code, compliance with the legal obligation of ZSSK CARGO under Article 6(1)(c) of the GDPR, in particular the obligations under Act No. 301/2005 Coll. the Criminal Code, as amended, Act No. 372/1990 Coll. on Misdemeanours, as amended, and other related legislation,
  - monitoring the premises of the controller for the purpose of ensuring the security, interests and protection of persons and the property of the controller and ensuring the protection of other rights and legitimate interests of the controller (Puškinova 3, Košice) – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the security, interests and protection of persons and the property of the controller and to ensure the protection of other rights and legitimate interests of the controller – Puškinova 3, Košice,
  - the monitoring of means of transport – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the protection of its property, but also the security of its employees and ensuring compliance with work discipline; the operation and use of company vehicles are monitored (road motor vehicles, locomotives, forklift trucks, and other), which in particular includes the GPS tracking of vehicles and the registration of persons

- authorised to drive company vehicles, monitoring the operation and use of company vehicles and means of transport in the case of damage and vandalism; in the event of an emergency, the audio recording serves as the so-called “black box” of the device,
- the monitoring (video, audio, GPS position, time stamp) of rolling stock by means of recording systems and evaluation devices for the purpose of investigating damage caused to rolling stock – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the security of employees and the protection of the employer’s property; in the event of an emergency, the audio recording serves as the so-called “black box” of the device,
  - the monitoring (GPS positioning) of the planned and unplanned activities of a train driver during a work shift via a terminal device (Tablet) in order to support the operational management of rail freight traffic – the legitimate interest of ZSSK CARGO as the controller, which is to monitor the current operational situation in order to ensure support for the operational management and planning of rail freight transport (reference data, train preparation, train operation, the handling of extraordinary events in operation, standard operational situations, the reporting of accidents, the typing of the “TrainReady” information), as well as to ensure employee safety,
  - the use of recordings from monitoring (video, audio, GPS location) by means of recording systems and evaluation devices, from monitoring by a CCTV system, recording systems and end user devices for the purpose of investigating accidents and insurance claims and criminal activity - the legitimate interest of ZSSK CARGO as the controller is to obtain evidence in the case of an insurance claim, traffic accident, other accident, criminal activity and other emergency for the purpose of investigating such an event,
  - making and publishing photos from public events (trade fairs, exhibitions, international meetings, team-building sessions and other social events) – the legitimate interest of ZSSK CARGO as the controller, which is to ensure information about rail freight innovation trade fairs and exhibitions at which the controller takes part,
  - making and publishing photos in ZSSK CARGO magazines – the legitimate interest of ZSSK CARGO as the controller, which is to ensure historical information regarding the business activities of the controller, its employees contributing to the significant development of the controller and its functioning in freight transport as a state-owned enterprise with the use of photographic material in a magazine that has historical significance for the Slovak Republic,
  - the information service “Ask us” – ZSSK CARGO contact point, the purpose of personal data processing is to handle general inquiries and questions from the general public (outside the scope of Act No. 211/2000 Coll. on Freedom of Information) – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the handling of general inquiries and questions from the general public via the ZSSK CARGO customer centre and the ISP customer portal,



- the price calculation on-line service (providing on-line information about the price of transport services) based on the request of a (potential) customer or a natural person acting on its behalf – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the provision of information based on the request of a person acting on behalf of a (potential) customer,
- the use of cookies on the website that are essential for ensuring the proper operation (display) of the website and internet services – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the functionality of the website,
- the assessment of questionnaires for measuring customer satisfaction, survey assessment and distribution of results and the provision of feedback to the ZSSK CARGO organisational units – the legitimate interest of ZSSK CARGO as the controller, which is to conduct customer satisfaction surveys for the certified products “Rail freight transport – logistic trains”, “Rolling Stock Maintenance and Repairs”, “Procurement and purchasing, methodology and analysis, storage and road transport services” and “East Slovak Transshipment Yards”,
- carrying out marketing activities related to the promotion of ZSSK CARGO, in particular: Providing information about the services and activities performed by the controller by sending Newsletters or in another similar way; Sending invitations to various events and promotional campaigns; Marketing surveys; Organisation of consumer contests – the legitimate interest of ZSSK CARGO as the controller, which is to ensure the promotion of its activities (e.g. sending marketing information to ZSSK CARGO customers).

#### **4. What personal data concerning you we process**

ZSSK CARGO may process your personal data, which are divided into the following categories or types:

- general personal data, divided into identification data (name, surname, title, date of birth, ID card number, birth registration number, ...), contact data (permanent address, temporary address, e-mail address, telephone number, ...), operational data (information on working hours, job position, identification number, password, access code, affiliation to a contracting party, .. .), location data (geographical location), economic identity identifiers (wage information, bank account number, bank details, ...), social identity identifiers (marital status, number of children, education, ...), mental identity identifiers (personality characteristics),
- a special category of personal data such as health or integrity information, provided you are an employee of ZSSK CARGO.

The types of personal data processed depend on whether you are a ZSSK CARGO employee, an authorised person based on a contractual relationship, a supplier, a customer, a visitor or another contracting party.

#### **5. Personal data processed on the basis of consent**

The processing of personal data based on your consent allows ZSSK CARGO to process personal data:

- in its register of job applicants – your personal data, which are collected based on your consent, are processed for the period of validity of your consent or for a period of 1 year,
- keeping travel and transport benefits documentation – your personal data, which are collected based on your consent, are processed for the period of validity of your consent or for a period of 3 years,
- publication of obituary notices about the death of a data subject on the premises of the controller, within electronic communication between the controller and its employees, and in the social column of the Cargo INFO magazine – personal data collected on the basis of your consent as a close person are processed for the period of validity of your consent or for a period of 5 years,
- informing relatives of the data subject in the event of an accident or emergency involving the data subject as an employee – your personal data, which are collected based on your consent, are processed for the period of validity of your consent or for the duration of the employment relationship,
- organising and ensuring sports competitions held as part of the regeneration of the workforce within international organisations under the provisions of the collective agreement and competitions held within the railway workers' organisation - personal data collected on the basis of your consent as a close person are processed for the period of validity of your consent or for a period of 5 years,
- making and publishing photos of employees and members of the company bodies on the ZSSK CARGO intranet and on e-mail accounts – your personal data, which are collected based on your consent, are processed for the period of validity of your consent or for the duration of the employment relationship,
- publishing photos of employees on e-mail accounts – your personal data, which are collected based on your consent, are processed for the period of validity of your consent or for the duration of the employment relationship,
- making and publishing photos of employees and members of the company bodies on the ZSSK CARGO website – your personal data, which are collected based on your consent, are processed for the period of validity of your consent,
- making and publishing of promotional photos and videos of employees and members of the company bodies on social network accounts that are administered by ZSSK CARGO (e.g. Facebook, Instagram, YouTube accounts, etc.), - your personal data, which are collected based on your consent, are processed for the period of validity of your consent,
- making and publishing of photos in the ZSSK CARGO magazines – your personal data, which are collected based on your consent, are processed for the period of validity of your consent or for a period of 5 years; after the expiry of this period, they shall become the subject of a privileged purpose, because once the storage period expires, the magazine is considered an archival document by the Ministry of Interior of the Slovak Republic, the Slovak National Archives,
- the use of analytical cookies on the website that are intended to improve user experience and to analyse traffic statistics – your personal data, which are collected based on your consent, are processed for a period of 1 day to 1 week,

- carrying out marketing activities related to the promotion of ZSSK CARGO, in particular: Providing information about the services and activities performed by the controller by sending Newsletters or in another similar way; Sending invitations to various events and promotional campaigns; Marketing surveys; Organisation of consumer contests – your personal data, which are collected based on your consent, are processed for the period of validity of your consent or for a period of 3 years from the end of sending Newsletters,

In the case of processing of your personal data that you have provided to us based on your consent, you are entitled to exercise your rights, namely: the right to information, the right of access, the right to rectification, the right to restriction of processing, the right to erasure, and the right to lodge a complaint with a supervisory authority.

If you withdraw your consent to the processing of personal data, ZSSK CARGO will immediately cease the processing of your personal data. Please be aware that upon the withdrawal of consent, you may lose information about the ZSSK CARGO and its activities.

## **6. Categories of recipients:**

ZSSK CARGO uses the professional services of other entities to ensure compliance with its obligations arising from generally applicable regulations and from its business activities. ZSSK CARGO has the use of professional services of other entities covered by processor contracts on the basis of which the instructions and procedures for the processing of your personal data are determined. The categories of recipients to whom ZSSK CARGO provides your personal data include:

- state administration and public authorities,
- courts,
- law enforcement agencies,
- distrainers, notaries, lawyers,
- banking institutions,
- health insurance companies,
- other authorised persons on the basis of a contractual relationship as processors or professional processors (for example, OSH and fire protection technician services, occupational health service, law office services, external registry centre services, information systems provision services, ...).

We can provide you with more detailed information about professional processors on the basis of your justified request for access to information.

## **7. Period of storage of personal data:**

The storage of personal data concerning you that we process is subject to Act No. 395/2002 Coll. on Archives and Registries and on Amendments and Supplements to Certain Acts, as amended, other applicable legal regulations in connection with mandatory registry administration. We process the personal data we have obtained from you based on your consent for the period of validity of your consent or for a period of 1 year, 3 years, 5 years or for the duration of your employment. After the purpose of processing ceases to exist, personal data shall be physically disposed of within the disposal procedure through the Ministry of Interior of the Slovak Republic, the Slovak National Archives.

ZSSK CARGO stores the personal data of data subjects for a different period of time, depending on the reason and purpose of their processing. In general, it is understood that ZSSK CARGO processes personal data:

- for such period as required by the applicable generally binding legal regulation, provided it processes personal data to comply with its legal obligations;
- for the duration of a contractual relationship established by a contract, or the duration of pre-contractual relationships, provided it processes personal data for the purpose of performing the contract;
- for the duration of the legitimate interest pursued by ZSSK CARGO, provided that the processing of personal data is necessary for such purpose;
- for such period as expressly stated in the consent or until it is withdrawn, provided that personal data are processed on the basis of consent.

For more detailed information on the purposes of processing of your personal data, the legal basis and the storage period, please go to the section [Records of ZSSK CARGO processing activities](#).

## **8. Exercising your rights**

- a) Right to withdraw consent – in cases where we process your personal data based on your consent, you have the right to withdraw such consent at any time. You can withdraw your consent electronically, at the address of our company, in writing, by sending a notice of withdrawal of consent, or in person. The withdrawal of consent shall not affect the lawfulness of the processing of personal data concerning you that we processed on the basis of such consent.
- b) Right of access – you have the right to be provided with a copy of the personal data concerning you that we keep, as well as information about how we process your personal data. In most cases, your personal data will be provided to you in written documentary form, unless you request another way of providing them. If you have requested the provision of such information by electronic means, it will be provided to you electronically if technically possible.
- c) Right to rectification – we take reasonable measures to ensure the data concerning you that we process are accurate, complete and up to date. If you believe that the personal data we keep are inaccurate, incomplete or out of date, please ask us to rectify, update or complete such information.
- d) Right to erasure (right to be forgotten) – you have the right to demand that we erase your personal data, for example, if the personal data concerning you we have collected are no longer necessary to pursue the original purpose of processing. However, your right must be assessed taking account of all the relevant circumstances. For example, we may have certain legal and regulatory obligations, which means that we will not be able to comply with your request.
- e) Right to restriction of processing – under certain circumstances, you are entitled to demand that we no longer process your personal data. These are, for example, cases when you think that the personal data concerning you we keep may be inaccurate or when you think that we no longer need to process your personal data. However, we have to investigate the restriction of processing of personal data.
- f) Right to data portability – under certain circumstances, you have the right to request us to transmit the personal data you have provided to us to a third party or another controller of your choice. However, the right to data portability only applies to

personal data we have obtained from you on the basis of consent or on the basis of a contract where you are one of the contracting parties.

- g) Right to object – you have the right to object to data processing which is, however, based on our legitimate interests. In the event that we do not have a compelling legitimate reason for processing and you lodge an objection, we will no longer process your personal data.
- h) Right to lodge a petition to commence personal data protection proceedings – if you believe we have processed your personal data unlawfully, you have the right to lodge a complaint with a supervisory authority, such authority being the Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27; phone: +421 /2/ 3231 3214; e-mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk)

We address the exercise of your rights without delay. In the event that a data subject's requests are unreasonably repetitive, ZSSK CARGO may charge a reasonable administrative fee for handling such requests.

Requests to exercise your rights can be submitted in writing to the address specified in the controller's contact data, or you can submit a request electronically via e-mail on condition that you prove the request is reasonable.

## **9. Right to object**

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to the processing of personal data concerning him or her which is carried out under Article 6(1)(f) of the Regulation, including objection to profiling based on the mentioned provisions of the Regulation. The controller shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. Processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall be subject to appropriate safeguards for the rights and freedoms of the data subject pursuant to the Regulation. Those safeguards ensure that technical and organisational measures are in place in order to ensure, in particular, the principle of data minimisation. The data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her.

## **10. Source from which personal data are obtained**

When performing its own tasks and duties, ZSSK CARGO collects your personal data directly from you, or collects them from third parties when discharging its duties. For example, ZSSK CARGO collects your personal data in the performance of obligations arising from the personnel and payroll agenda.

We may process your personal data which we have not collected directly from you as the data subject as part of the discharge of the obligations of ZSSK CARGO as an employer if you are, for example, a family member of a ZSSK CARGO employee or his/her close person.

We may also collect your personal data in the case of concluding contractual relationships and business cases. Your personal data may be part of a business case as those of a contact person of the other contracting party or you are our customer.

In verifying the accuracy of data of statutory bodies of our contractual clients, we also use publicly accessible registers, such as Finstat or the Business Register, to obtain personal data.

### **11. Consequences of failure to provide your personal data**

If we process your personal data in accordance with special legal regulations, legitimate interest or on the basis of consent, failure to provide your personal data might result in the impossibility for ZSSK CARGO to perform its tasks and obligations. For example, we will not be able to enter into an employment relationship with you as an employee, we will not allow you to enter the ZSSK CARGO premises, we will not enter into a mutual contractual relationship with you as a contracting party or provide you with information about newly offered services.

### **12. Information about automated individual decision-making and profiling**

The processing of your personal data is not subject to automated individual decision-making, including profiling, and your personal data will not be used in such a manner.

### **13. Security of personal data processing**

ZSSK CARGO consistently respects the principles of processing of the personal data of data subjects and their privacy, while ensuring that personal data shall in particular be:

- processed lawfully, fairly and in a transparent manner;
- collected for specified, explicit and legitimate purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Regarding the processing of your personal data, ZSSK CARGO keeps records of processing activities so that we can more logically identify the information systems and methods of processing of your personal data. To ensure the protection of personal data, ZSSK CARGO has taken technical and organisational measures to protect the processing of your personal data itself. Security measures are intended for the processing of your personal data in electronic and paper form. ZSSK CARGO has taken measures to protect your personal data, providing protection through mechanical, technical, regime and personnel security means. The persons who process your personal data have been trained and instructed in the methods and procedures of personal data processing. ZSSK CARGO requires the same procedures from its professional processors.

The adopted security measures shall ensure adequate protection of personal data processing in connection with the risks naturally inherent in the processing and nature

of personal data. For the processing of personal data, ZSSK CARGO has determined a group of authorised persons who are authorised to process your personal data.

#### **14. Transfer of personal data**

As ZSSK CARGO carries out its business activities through its own employees, it can be considered a controller under the GDPR. ZSSK CARGO, as the controller, processes the personal data of its own employees, members of the statutory body, contractual clients, customers, authorised persons arising from contractual relationships and other data subjects, which data are part of the ZSSK CARGO registries. In the course of carrying out its business activities, ZSSK CARGO uses the services of professional processors who process the personal data of data subjects on behalf of ZSSK CARGO.

ZSSK CARGO conducts its business activities in the Slovak Republic, in the European Union, and in third countries.

ZSSK CARGO is affiliated to a central body, namely the Ministry of Transport and Construction of the Slovak Republic as 100% owner of ZSSK CARGO. ZSSK CARGO also cooperates with organisations associating companies engaging in the business of rail freight.

The transfer of personal data which are undergoing processing or are intended for processing after transfer to a third country or to an international organisation shall take place only if the conditions laid down in the GDPR are complied with by ZSSK CARGO, including for onward transfers of personal data from the third country or an international organisation to another third country or to another international organisation. All provisions set forth in the GDPR shall be applied in order to ensure that the level of protection of natural persons is not undermined. ZSSK CARGO carries out the transfer of personal data mainly to ensure its business activities. ZSSK CARGO mainly transmits general data (identification, contact and operational) concerning its employees who are contact/authorised persons arising from contractual relationships.

The transfer of personal data is carried out on the basis of a legally binding and enforceable instrument between public authorities or bodies, on the basis of standard data protection clauses, contractual clauses between the controller or processor and the controller, processor or the recipient of the personal data in the third country or international organisation.

Personal data may also be transmitted by a ZSSK CARGO processor. In this case, in order to ensure the filling of vacancies, ZSSK CARGO uses the services of Profesia, spol. s r. o., which engages other processors to ensure its services: Google Ireland Limited, the Google Cloud Platform service under the Google Cloud Platform Terms of Service published on the website: <https://cloud.google.com/terms/>; Hotjar Limited, C 65490, Level 2, St Julian's Business Centre, 3, Elia Zammit Street, St Julian's STJ 1000, Malta; Functional Software Inc. (Sentry) 132 Hawthorne Street, San Francisco, California 94107, USA.

Personal data may also be transferred to the operators of the social networks Facebook, Instagram, YouTube, etc. Further information on the purposes and scope of data processing, on the further use of personal data of ZSSK CARGO website visitors by social network service providers and their websites, as well as on the rights

of website visitors and any privacy protection settings are always provided in the data protection statement published by the respective service (social network) provider.

Facebook: <http://www.facebook.com/policy.php>

Instagram: <https://help.instagram.com/155833707900388>

YouTube: <https://policies.google.com/privacy?hl=en-US>

## **15. Monitoring agenda**

- **CCTV monitoring system**

To ensure the security and protection of persons and property, ZSSK CARGO uses a CCTV monitoring system to protect its workplaces, operational premises and rolling stock. Personal data are processed for the specific purpose of ensuring the security and protection of persons and property of the controller. Personal data are processed by automated means – a CCTV monitoring system. The legal basis for personal data processing is legitimate interest. Monitoring is carried out in the areas where the assets that need to be protected from being damaged, stolen or destroyed are located. The monitoring of the object is carried out only to the extent necessary to achieve the purpose. General personal data are processed – a video recording of the behaviour and conduct of the data subject. The obligation to provide information about monitoring is fulfilled by ZSSK CARGO posting pictogram images.

- **Monitoring of end user workstations**

The monitoring of the end user workstations of ZSSK CARGO employees (hereinafter referred to as “Workstations”) (i) to ensure the protection of the security and assets of ZSSK CARGO and those of third parties entrusted to ZSSK CARGO, the protection of the financial interests of ZSSK CARGO, the prevention of any leak or unauthorised handling of the personal data of data subjects or classified information, the protection of other rights and legitimate interests of ZSSK CARGO or those of third parties and the prevention of damage; (ii.) to ensure the control of the performance of the occupational duties of employees within their employment relationships and the observance of work discipline, including the control of the effective use of working time by the employees of ZSSK CARGO, with respect to the special nature of the activities of ZSSK CARGO, and the processing pursuant to this paragraph shall be carried out by processing the Workstation records, which include, for example, information on the use of Workstations, applications, websites, connected devices, e-mails, printing, network traffic, file operations, and so on. General personal data (identification, contact, operational data) are processed – including descriptive data, records of access to individual files and programs on company end user devices, records of the use of the Internet and the company network (LAN and Wi-Fi), records of the use of electronic mail, information on the use of printers and multifunctional devices and other input-output devices, records of work with company end user devices and error information.

- **The monitoring (video, audio, GPS position, time stamp) of rolling stock by means of recording systems and evaluation devices for the purpose of investigating damage caused to rolling stock and the monitoring (GPS**



**positioning) of the planned and unplanned activities of a train driver during a work shift via a terminal device (Tablet) in order to support the operational management of rail freight traffic.**

ZSSK CARGO uses the monitoring to ensure the security of employees and protection of the employer's property; in the event of an emergency, the audio recording serves as the so-called "black box" of the device. ZSSK CARGO, as the controller, monitors the current operational situation in order to ensure support for the operational management and planning of rail freight transport (reference data, train preparation, train operation, the handling of extraordinary events in operation, standard operational situations, the reporting of accidents, the typing of the "TrainReady" information), as well as to ensure employee safety. General personal data (identification, contact, location, operational data) and conduct and behaviour data are processed.

- **The use of recordings from monitoring (video, audio, GPS location) by means of recording systems and evaluation devices, from monitoring by a CCTV system, recording systems and end user devices for the purpose of investigating accidents and insurance claims and criminal activity**

In the case of an insurance claim, traffic accident, other accident, criminal activity and other emergency, ZSSK CARGO uses monitoring recordings to obtain evidence for the purpose of investigating such an event. Personal data (general personal data - driver's visual record, behaviour and conduct data, operational data (time of entry and exit, motor vehicle registration number), general personal data (identification, operational, location) are processed on the legal basis under Article 6(1)(f) of the Regulation - legitimate interest, further processing - Recital 50 of the Regulation, Article 6(1)(c) of the Regulation until an insurance claim, traffic accident, criminal activity or other emergency is investigated or until the expiry of the period of storage of an investigation, judicial or other file in the matter concerned.

## **16. Use of cookies on the website**

ZSSK CARGO uses cookies to ensure the functioning of its website. Our portal uses cookies to ensure user-friendly websites and adapting the operation of our websites to your needs. A cookie is a small file that is stored locally on your computer when you visit a website. Cookies also allow us to analyse the use of our websites. They do not include any personal data and it is not possible to identify you through them on third-party websites – including those of analysis providers. We use essential cookies that enable the basic functionalities of our website.

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## 17. Personal data processing classified into main groups

No.	Agenda	No.	Purpose of processing
I.	<b>Basic documents agenda</b>	1	keeping founding deeds or memoranda of association including underlying documentation
		2	keeping the company's articles of association and their amendments
		3	keeping records of the establishment of the company and the founder's decisions
		4	keeping extracts from the business register, trade certificates
		5	maintaining lists of members/shareholders, deposits, shares and securities
		6	keeping annual reports on the business activities and management of the company
		7	keeping records of changes, reorganisation or dissolution, liquidation, bankruptcy, disposal
		8	keeping documentation concerning trademarks, protective designs, patents, improvement proposals, licences
		9	keeping documentation concerning ZSSK CARGO joint ventures and subsidiaries
II.	<b>Board of directors, supervisory board</b>	10	keeping the rules of procedure and statutes of the Board of Directors and of the Supervisory Board

	<b>and general meeting agenda</b>	11	keeping minutes and materials from meetings of the Board of Directors and of the Supervisory Board with attachments, and the election of company bodies
		12	keeping decisions and documents adopted by the General Meeting
<b>III.</b>	<b>Operational management agenda</b>	13	keeping orders, decisions, measures, decrees of the CEO and of the members of the Board of Directors
		14	keeping minutes and materials from management meetings
		15	keeping minutes of meetings of organisational units
		16	conducting video conferences and video training sessions via the Teams application
		17	keeping internal standards and regulations of a significant nature
		18	keeping internal standards of inferior organisational units
		19	keeping ZSSK CARGO plans (annual)
		20	maintaining the integrated management system – certified products (ISO 9001, OHSAS 18001)
		21	keeping project management documentation
		22	keeping documentation of third-party directives and instructions
		23	keeping requests handling documentation under special legal regulations
		24	keeping annual statistical reports
		25	keeping monthly and quarterly statistical reports
		26	keeping records of delivery, giving instruction to and informing employees
<b>IV.</b>	<b>Legal agenda</b>	28	keeping authorisations and powers of attorney documentation
		29	keeping central registers of contractual relations
		30	keeping investment contracts and purchase orders
		31	keeping loan agreements, insurance contracts, leasing contracts
		32	keeping general contracts
		33	keeping documentation concerning lawsuits, distraint and recovery procedures

		34	keeping lists of contact persons and authorised persons arising from contractual relations
		35	keeping of personal data of statutory bodies of contractual clients from public registers
		36	keeping documentation concerning legal opinions, opinions on draft contracts
<b>V.</b>	<b>Auditing agenda</b>	37	keeping internal audit agenda
		38	keeping external audit agenda – financial and tax audit
		39	keeping documentation of plans for main control and revision tasks and audits (short-term)
		40	keeping internal control and audit reports
		41	keeping records of the handling of complaints, submissions and notifications
		42	keeping documentation of external controls and audits by state bodies
		43	maintaining documentation of routine operational checks and inspections
<b>VI.</b>	<b>Security, crisis management, civil protection (CP), fire protection (FP) and personal data protection (PDP) agenda</b>	44	keeping crisis management documentation
		45	keeping economic mobilisation documentation
		46	keeping trade secrecy documentation
		47	keeping civil protection documentation
		48	keeping main CP tasks documentation – annual
		49	keeping fire protection documentation
		50	keeping fire project, fire safety characteristics of buildings documentation
		51	keeping personal data protection documentation
		52	keeping nuclear material shipments/special shipments documentation
		53	keeping records of persons entering buildings and keeping records of one-time entry permits for external persons
		54	keeping documentation confirming the clean records of persons entering a nuclear facility for the purpose of transport
		55	electronic keys (chip cards) of employees on the premises of the employer – the controller’s registered office at Tomášikova 28B, Bratislava
		56	keeping property protection documentation
		57	keeping records of employee cards and permits with authorisation
		58	keeping major accidents documentation
		59	keeping minor accidents documentation

		60	keeping damages and loss events documentation
		61	keeping records of employees (EPSIS, employee card)
		62	provision of personal data to public authorities based on their requests
<b>VII.</b>	<b>Registry and archive management agenda</b>	63	keeping registry books
		64	keeping registry management auxiliary records
		65	keeping decommissioning procedure documentation
		66	keeping lists and logs of records taken over by the registry centre
		67	keeping lists of archival documents handed over to the archives
		68	keeping postal books and other records of postal items
		69	keeping records of registry records borrowed
<b>VIII.</b>	<b>Investment activity agenda</b>	70	keeping investment studies, plans and schedules for buildings
		71	keeping investment committee decisions and records
		72	keeping records of large investment projects and their implementation
		73	keeping other investment projects
<b>IX.</b>	<b>International relations agenda</b>	74	keeping documentation concerning the company's membership in international organisations and associations
		75	keeping business trips abroad documentation
		76	keeping records of claims for business trips abroad
		77	keeping documentation concerning the organisation of international negotiations in Slovakia
		78	keeping guidelines for the implementation of international relations
		79	keeping protocols from cross-border conferences, meetings of the UIC, the Organisation for Cooperation between Railways, the BCC
<b>X.</b>	<b>Personnel agenda</b>	80	keeping job selection procedures documentation
		81	keeping a database of job applicants
		82	keeping overviews of the number and composition of employees – annually
		83	keeping personal files of employees and similar relationships

		84	keeping working time documentation and attendance records
		85	keeping records of maternity and parental leaves
		86	keeping records of unpaid leave and long-term releases due to general interest, volunteering and military service
		87	keeping records of incapacity for work and attending to a sick family member
		88	keeping overtime work and on-call duty documentation
		89	keeping night work documentation
		90	keeping business trips documentation
		91	keeping travel and transport benefits documentation
		92	delivering forms, documents and communications of a notification and informative nature to employees via a private e-mail box
		93	publication of obituary notices about the death of a data subject on the premises of the controller, within electronic communication between the controller and its employees, and in the social column of the Cargo INFO magazine
		94	informing relatives of the data subject in the event of an accident or emergency involving the data subject as an employee
		95	benefits for employees for recreational and sports activities – MultiSport card
<b>XI.</b>	<b>Wage agenda</b>	96	keeping wage analyses and overviews documentation (summaries, recapitulations)
		97	keeping annual statistical reports and payroll reports
		98	keeping payrolls
		99	keeping records of pension insurance
		100	keeping payrolls and payslips (non-electronic, electronic)
		101	sending payslips by electronic means
		102	keeping annual statements of tax from employment
		103	keeping payroll reports for tax purposes
		104	keeping quarterly and annual reports on withheld and paid tax advances
		105	keeping annual health insurance reconciliation statements

		106	keeping records of wage deductions and employee distraint warrants
		107	keeping records of social, sickness and health insurance and supplementary insurance companies
		108	keeping various underlying documents concerning wages and bonuses
		109	keeping recreation allowance documentation
		110	keeping income certificates
<b>XII.</b>	<b>Social care and occupational health service agenda</b>	111	keeping collective agreements and bargaining documentation
		112	keeping social dialogue documentation
		113	keeping documentation concerning the provision of company meals and refreshments for employees under difficult working conditions
		114	keeping social fund documentation
		115	keeping employee pension insurance documentation
		116	keeping ZSSK CARGO employee awards documentation
		117	organizing and ensuring events held within the framework of workforce regeneration within international organizations resulting from the provisions of the collective agreement
		118	organizing and ensuring sports competitions held within the framework of workforce regeneration within international organizations arising from the provisions of the collective agreement and competitions held within the framework of the railway workers' organization
		119	keeping medical fitness assessment documentation
		120	keeping medical fitness assessment documentation – for chemical carcinogens
		121	keeping mental fitness assessment documentation
		122	keeping rehabilitation stays and services documentation (work at risk of exposure to noise, vibrations, chemical factors, dust) – mandatory
		123	keeping rehabilitation stays and services documentation (work at risk of exposure to chemical carcinogens) – mandatory
		124	keeping rehabilitation stays and services documentation – non-mandatory



		125	keeping occupational health service documentation
		126	keeping occupational health service documentation – chemical carcinogens
		127	keeping occupational health service documentation – health and hygiene situation in the company
		128	keeping documentation of records of a worker's personal dose during the transport of radioactive materials
		129	keeping documentation concerning prohibited work of women and young people
<b>XIII.</b>	<b>Security and occupational safety and health (OSH) agenda</b>	130	keeping OSH organisation and methodology documentation
		131	keeping documentation of checks, findings and assessments on the security situation in the company
		132	keeping records of initial and periodic OSH training
		133	keeping records of occupational accidents, injuries, incidents and dangerous events
		134	keeping records of other injuries
		135	keeping records of serious occupational injuries
		136	keeping records of personal protective work equipment provided
		137	keeping compensation and recourse proceedings documentation
		138	keeping TAT books – testing for alcohol and drug addiction
<b>XIV.</b>	<b>Education and training agenda</b>	139	keeping records of the attainment by employees of professional competence and qualifications
		140	keeping training plans and maintaining professional competence – annual
		141	keeping syllabi and teaching texts documentation
		142	keeping documentation concerning internships and study stays abroad, further professional education and education according to other legislation – STN
		143	keeping documentation concerning universities, secondary schools and relations with them

		144	keeping records of employee education and training in an e-learning manner through an information system
		145	employee education - employee personal development
<b>XV.</b>	<b>Personnel controlling agenda</b>	146	keeping HR analyses agenda
		147	keeping planned jobs systematisation agenda
		148	keeping documentation for the analysis of the efficiency of the means of production at ZSSK CARGO – monitoring the productivity of locomotives and wagons in selected professions at ZSSK CARGO
		149	keeping annual employment statistical reports
<b>XVI.</b>	<b>IT agenda</b>	150	keeping records of licences for the company's software
		151	keeping hardware, network and information system tests agenda
		152	keeping self-created software methodology documentation
		153	keeping documentation concerning delivered software methodology, instructions, videos, etc.
		154	keeping information systems and end user devices security and administration documentation
		155	keeping records of codes and access rights and key users
		156	data storage and backup in electronic systems and server hardware
		157	technical support for information systems and information and communication technologies
		158	keeping documentation of communication with authors of licences, complaints, SW modifications
		159	keeping annual and multi-year information systems development concept and policy documentation
		160	keeping SICT requests documentation
161	keeping SICT changes and modifications documentation		
<b>XVII.</b>	<b>Environmental agenda</b>	162	keeping environmental protection and creation concepts documentation
		163	keeping documentation concerning the exercise of power by state authorities in the environmental area

		164	keeping waste management programs documentation
		165	keeping documentation concerning the introduction of environment-friendly procedures
		166	keeping environmental care records
		167	keeping records of hazardous waste
		168	keeping records of other waste
		169	keeping waste transport documentation
		170	keeping documentation concerning the assessment of the technical condition of oil product storage tanks
<b>XVIII.</b>	<b>Logistics and procurement agenda</b>	171	keeping procurement plans documentation
		172	keeping inventory records documentation
		173	keeping materials return and requisition notes
		174	keeping documentation concerning the procurement of goods, services and construction works according to the Public Procurement Act
		175	keeping procurement documentation according to the Commercial Code
		176	keeping service requests and requirements (for transport, services, road haulage, purchase, procurement, ...)
		177	keeping records of sales and deliveries of goods and services
		178	keeping complaints, defects and damages documentation
		179	keeping records of certificates of material items and services procured
<b>XIX.</b>	<b>Sales activity and price agenda</b>	180	keeping sales agenda documentation
		181	keeping own price lists documentation
		182	keeping price quotations and calculations documentation and underlying documents
		183	keeping third-party price lists and quotations documentation
<b>XX.</b>	<b>Promotion agenda</b>	184	keeping documentation of overviews and press clippings, photographic, film and sound materials relating to the company
		185	keeping documentation of advertising publications about the company (in one copy) and promotional activities
		186	keeping press releases and official statements documentation
		187	keeping media and periodical press monitoring documentation
		188	keeping the ZSSK CARGO magazine

		189	keeping trade fairs and exhibitions participation documentation
		190	social networks - managing profiles on social networks, including communication and discussion with users for the purpose of promotion and offering services on social networks, communication with users, promotion of accompanying activities through social networks, provision of information to the wider public (company profile, so-called fan page on Facebook, Instagram)
		191	social networks - statistical purposes
<b>XXI.</b>	<b>Financial matters agenda</b>	192	keeping documentation of communication with banks
		193	keeping profit distribution documentation
		194	keeping documentation of methodological guidelines and comments in the area of taxes
		195	keeping tax agenda documentation
		196	keeping documentation concerning the assessment of fees, taxes and allowances
<b>XXII.</b>	<b>Accounting agenda</b>	197	keeping documentation of reports on economic results – partial
		198	keeping accounting schedule documentation
		199	keeping a book of invoices
		200	keeping general ledgers
		201	keeping financial statements – annual, extraordinary
		202	keeping financial statements – monthly
		203	reconciliation of assets and liabilities
		204	keeping capital expenditure invoices subject to the Value Added Tax Act
		205	keeping purchases invoices
		206	keeping sales invoices
		207	keeping advance and penalty invoices
		208	keeping internal invoices
		209	keeping customs invoices
		210	keeping underlying documents for invoicing
		211	keeping sales and purchases ledgers
		212	keeping accounting statements – monthly
		213	keeping the treasury agenda
		214	keeping bank statements and account statements
215	keeping accounting documents		
216	keeping assets and liabilities documentation		
217	keeping off-balance sheet records		
218	keeping internal documents		

		219	keeping accounting documents, economic information and special records documentation
		220	keeping business trip orders documentation
<b>XXIII.</b>	<b>Clearing agenda</b>	221	keeping clearing documentation for goods and wagons in international transport
		222	keeping transport documents for international transport
		223	keeping transport documents for inland transport
		224	keeping documents for internal accounting and analysis processing
		225	keeping cross-sectional controls documentation
		226	keeping documents for the processing of clearing overdrafts
		227	keeping documentation for the central clearing house BCC
		228	keeping receivables and payables clearing documentation
		229	Keeping documentation for the closings of receivables and liabilities towards foreign railways
		230	keeping invoice clearing documentation
		231	keeping clearing complaints documentation
		232	keeping records of contact and authorised persons arising from contractual relations (Finstat)
<b>XXIV.</b>	<b>Real estate agenda</b>	233	keeping documentation for contracts and decisions on the acquisition, sale and transfer of ownership rights
		234	keeping extracts from cadastral and land registers
		235	keeping a real estate register
		236	keeping documentation of projects of completed constructions
		237	keeping basic buildings and real estate documentation
		238	keeping property valuation documentation
		239	keeping photo documentation of buildings and constructions and their surroundings
		240	Keeping auxiliary geodetic, cartographic and project documentation
		241	keeping documentation of rental relationships and use of real estate
		242	keeping real estate lending documentation

		243	keeping real estate management documentation
<b>XXV.</b>	<b>Machines, equipment, rolling stock and other movable property agenda</b>	244	keeping movable property acquisition documentation
		245	keeping registration sheets, cards and passports of machines, equipment, rolling stock and other movable property
		246	keeping documentation of repairs of machines, equipment, rolling stock and other movable property
		247	keeping records of inspection and maintenance of machines, equipment, rolling stock and other movable property
		248	keeping machine and equipment revisions documentation
		249	keeping documentation concerning planned repairs and maintenance of machines, equipment, rolling stock and other movable property
		250	keeping welding and casting documentation
		251	keeping warranty certificates and other warranty documents and complaints documentation
		252	keeping machines, equipment, rolling stock and other movable property documentation
		253	keeping a vehicle log book (GPS, log books)
		254	keeping documentation concerning entrusted material property
		255	keeping records on the allocation and taking away of motor vehicles, machines, equipment and other movable property
		256	keeping defectoscopy documentation
		257	keeping metrology documentation
		258	keeping Rail Vehicle weighing documentation
		259	keeping rolling stock measurement and testing documentation
		260	keeping chemical laboratory and chemical substances documentation
261	keeping rolling stock maintenance and repair complaints documentation		
262	keeping ZSSK CARGO professional competence documentation		
<b>XXVI.</b>	<b>Energy agenda</b>	263	keeping documentation of balances of all types of utilities
		264	keeping documentation of permits for the supply and distribution of utilities

<b>XXVII.</b>	<b>Inventory-taking agenda</b>	265	keeping inventory-taking and disposal committee documentation and records
		266	keeping property inventories
		267	keeping inventory and trade goods reconciliation documentation
		268	keeping movable property commissioning documentation
		269	keeping real estate commissioning documentation
		270	keeping movable property depreciation and decommissioning documentation
		271	keeping real estate depreciation and decommissioning documentation
<b>XXVIII.</b>	<b>Transport realisation agenda</b>	272	keeping the timetable agenda
		273	keeping wagon damage documentation
		274	keeping transport realisation books and records
		275	keeping wagon lease documentation
		276	keeping rail transport operation documentation
		277	keeping logbooks of wagons and tanks
		278	keeping customs clearance documentation
		279	keeping ESTY transshipment documentation
		280	keeping a register of train drivers and representing the train driver in relation to the Transport Authority
<b>XXIX.</b>	<b>COVID-19 agenda</b>	281	<del>taking preventive measures with the aim of preventing or mitigating the risk associated with the emergence and spread of the dangerous contagious human disease COVID-19</del>
		282	<del>keeping records and documentation concerning the COVID-19 disease</del>
		283	<del>protection of the vital interests of the data subject or other natural persons and the fulfilment of the employer's legal obligations under Section 52(1)(a), Section 12(2) of Act No. 355/2007 Coll. on the protection, promotion and development of public health and on amendments and supplements to certain acts and decrees of the Public Health Authority, whereby ZSSK CARGO implements health protection</del>
<b>XXX.</b>	<b>Monitoring agenda</b>	284	monitoring the end user workstations of ZSSK CARGO employees via the DLP (Data Loss Prevention) system

		285	the video monitoring of the ZSSK CARGO premises and compounds (wagons repair workshops, pumping stations, locomotive depots)
		286	the video monitoring of the ZSSK CARGO premises and compounds (portal ramp – cranes – Čierna nad Tisou)
		287	the video monitoring of the ZSSK CARGO premises and compounds (Zvolen locomotive depot)
		288	the video monitoring of persons on the controller's monitored premises in connection with the monitoring of the ZSSK CARGO premises
		289	monitoring the premises of the controller for the purpose of ensuring the security, interests and protection of persons and the property of the controller and ensuring the protection of other rights and legitimate interests of the controller (Puškinova 3, Košice)
		290	the monitoring of means of transport
		291	the monitoring (video, audio, GPS position, time stamp) of rolling stock by means of recording systems and evaluation devices for the purpose of investigating accidents and emergencies
		292	the monitoring (video, audio, GPS position, time stamp) of rolling stock by means of recording systems and evaluation devices for the purpose of investigating damage caused to rolling stock
		293	the monitoring (GPS positioning) of the planned and unplanned activities of a train driver during a work shift via a terminal device (Tablet) in order to support the operational management of rail freight traffic
		294	the use of recordings from monitoring (video, audio, GPS location) by recording systems and evaluation devices, from monitoring by a camera system, recording systems and end devices for the purpose of investigating accidents and damage events and criminal activity
<b>XXXI.</b>	<b>Photographs agenda</b>	295	making and publishing photos of employees and members of the company bodies on the ZSSK CARGO intranet



		296	publishing photos of employees on e-mail accounts
		297	making and publishing photos of employees and members of the company bodies on the ZSSK CARGO website
		298	making and publishing photos and videos of employees and members of the company bodies on social network accounts that are administered by ZSSK CARGO (e.g. Facebook, Instagram and YouTube accounts, etc.)
		299	making and publishing photos from public events (trade fairs, exhibitions, international meetings, team-building sessions and other social events)
		300	making and publishing photos in the ZSSK CARGO magazines
<b>XXXII.</b>	<b>Customer centre agenda</b>	301	the information service "Ask us" – ZSSK CARGO contact point, the purpose of personal data processing is to handle general inquiries and questions from the general public (outside the scope of Act No. 211/2000 Coll. on Freedom of Information)
<b>XXXIII.</b>	<b>On-line services agenda</b>	302	ISP ZSSK CARGO customer portal – on-line access to ZSSK CARGO regulations and tariffs, on-line conclusion and implementation of transport contracts, conclusion of transport orders, monitoring the location of wagons and/or consignments Registry of Electronic Documents (RED)
		303	the price calculation on-line service (providing on-line information about the price of transport services) based on the request of a (potential) customer or a natural person acting on its behalf
		304	the use of cookies on the website that are essential for ensuring the proper operation (display) of the website and internet services
		305	the use of analytical cookies on the website that are intended to improve user experience and to analyse traffic statistics
<b>XXXIV.</b>	<b>Measuring customer satisfaction</b>	306	the assessment of questionnaires for measuring customer satisfaction, survey assessment and distribution of results and the provision of feedback to the ZSSK CARGO organisational units

<b>XXXV. Marketing</b>	307	<p>carrying out marketing activities related to the promotion of ZSSK CARGO, in particular:</p> <ul style="list-style-type: none"> <li>• Providing information about the services and activities performed by the controller by sending Newsletters or in another similar way;</li> <li>• Sending invitations to various events and promotional campaigns;</li> <li>• Marketing surveys;</li> <li>• Organisation of consumer contests.</li> </ul>
	308	<p>carrying out marketing activities related to the promotion of ZSSK CARGO, in particular:</p> <ul style="list-style-type: none"> <li>• Providing information about the services and activities performed by the controller by sending Newsletters or in another similar way;</li> <li>• Sending invitations to various events and promotional campaigns;</li> <li>• Marketing surveys;</li> <li>• Organisation of consumer contests.</li> </ul>

For more detailed information on the purposes of processing of your personal data, the legal basis and the storage period, please go to the section [Records of ZSSK CARGO processing activities](#).

In Bratislava, on 01/12/2024

Bank: Všeobecná úverová banka, a.s.  
IBAN: SK93 0200 0000 0022 1485 1459  
BIC: SUBASKBX

Corporate ID No.: 35914921  
VAT ID No.: SK 2021920065  
Incorporated in the Business Register of the Bratislava District  
Section: Sa, File No. 3496/B

