



## Personal data protection

The processing of personal data of data subjects is governed by 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) (hereinafter the “**Regulation**”), and Act No. 18/2018 Coll. on personal data protection, amending and supplementing certain acts (hereinafter the “**Personal Data Protection Act**”).

The purpose of this information is to explain how the company **Slovenský plynárenský priemysel, a.s.**, with the registered office at Mlynské nivy 44/a, 825 11 Bratislava, Slovak Republic, Company ID: 35 815 256, incorporated in the Commercial Register of the Bratislava III Municipal Court, Section: Sa, file no. 2749/B (hereinafter the “**Company**” or “**SPP**”) processes personal data of data subjects and what are their rights under this Regulation and the Personal Data Protection Act.

Under the Regulation and the Personal Data Protection Act, the Company acts as a controller in personal data processing, i.e. as an entity that, on its own or jointly with others, determines the purposes and means of processing the personal data of data subjects.

### Responsible person

In connection with personal data processing, the Company has designated a responsible person performing the tasks arising from the Regulation and the Personal Data Protection Act. If you have any questions or requests regarding personal data processing, you can contact the responsible person at the e-mail address [osobneudaje@spp.sk](mailto:osobneudaje@spp.sk).

### 1 How does SPP obtain personal data?

The Company obtains personal data in the following ways:

- directly from its customers upon concluding a contract;
- from publicly available sources, such as public registers or records;
- from persons who have voluntarily provided the Company with their personal data and have granted their consent to the processing thereof (by phone, e-mail, via the Company’s website, etc.);
- from persons entering the Company’s premises (including the Company’s camera recordings);
- from public authorities, service providers or other persons.

The Company obtains and processes personal data only to the extent that is adequate to the processing purpose thereof. The Company places particular emphasis on the security and protection of personal data and rights of data subjects.

### 2 What personal data categories does SPP process?

The Company only processes personal data that allow it to provide customers with services and customer care, to comply with various legal requirements, as well as to protect its legitimate interests. The Company collects personal data about customers, including potential customers, who are interested in the Company’s services or who have granted consent to it.

The Company mainly processes the following categories of customer personal data:

- Basic identification data, to the extent of: salutation, title, first name, surname, date of birth, signature. If the customer conducts business as a natural person – entrepreneur, this also includes Company ID, tax identification number and the place of business, including identification data necessary for the purposes of preventing and detecting money laundering and terrorist financing.
- Contact details, to the extent of: permanent residence address, correspondence address, point of delivery address, phone number, landline phone number, e-mail, POD (Point of Delivery) code, EIC (Electricity Identification Code), IP addresses.
- Data from vulnerable gas customers demonstrating that they are severely disabled and that they will use gas for heating, as well as data from vulnerable electricity customers demonstrating that



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their vital functions depend on electricity consumption or that they are severely disabled and will use electricity for heating.

- Economic and financial data, to the extent of: bank account number (IBAN), details of the product or service ordered by the customer, payment method, discount information.
- Information on the use of products (in particular, types of products used, use method of products, information on contractual performances provided under the contract).
- Information on energy consumption.
- Assigned identifiers (customer number, contract account number).
- Contents of phone calls, reports and rating based on recorded calls.
- Camera recordings.
- Other data necessary to comply with legal requirements, application and demonstration of the Company's legal claims.
- Identification and operational data related to the use of the Company's information systems and electronic services.
- Data on the use of the Company's website and its social media accounts, as well as data on the use of Moje SPP (My SPP) customer portal website.
- Data relating to the exercise of data subject's rights
- Video, audio and audio-visual recordings of events organised by the Company.

### **3 What is the legal basis and purpose of processing?**

The Company processes personal data based on the following legal entitlements set out by the Regulation and the Personal Data Protection Act:

- Legitimate interest

The Company may process the personal data of data subjects, if it is necessary for the legitimate interests of the Company, or of third parties, except where such interests are overridden by the interests or fundamental rights and freedoms of data subjects that require personal data protection, in particular where a data subject is a child. Such legitimate interests of the Company include, in particular:

- protection of rights and legitimate interests arising to the Company from generally binding legal regulations and contracts in relation to contractual partners and other persons; for this purpose, the Company retains personal data for no longer than necessary to protect such rights and legitimate interests;
- recovery of receivables and other claims of the Company; for this purpose, the Company retains personal data for no longer than the duration of the applicable statutes of limitations;
- fraud prevention, if the Company reasonably believes that there is a risk of such conduct; for this purpose, the Company retains personal data for no longer than the period established by generally binding legal regulations;
- protection of property, life and health; for this purpose, the Company retains:
  - personal data of persons entering the Company's sites, using camera recordings, for no longer than 72 hours from entry;
  - personal data regarding the movement of tenants' employees within the Company's sites, using building access control system, for no longer than 30 days from entry;
  - personal data regarding employees of tenants in the Company's sites, using access cards data records, for a period not exceeding the duration of the employment relationship between the data subject and the Tenant or the duration of the lease relationship between the Company and the Tenant, whichever occurs first.
- marketing activities of the Company, which mainly include provision of information about selected new offerings, discounts, prize contests, more advantageous energy offerings and related services (e.g. green services), practical advice (e.g. energy saving), other products (e.g. photovoltaics, virtual battery); this communication may include surveys to improve customer satisfaction, as well as general and specialised tailor-made business offers or obtaining more advantageous products and services provided by the Company's contractual partners; marketing communication is sent occasionally, usually a few times a year, at most about once a month; for this purpose, the Company retains personal data for no longer than the duration of the Company's legitimate interest, mostly for the duration of a contractual relationship between



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the Company and a data subject and for a reasonable period after termination thereof;

- quality improvement of services provided to customers, in particular by recording phone calls made to the SPP Customer Line, the SPP Business Line and the SPP Fair Line for the purposes of concluding, updating and terminating contracts, providing customer care, handling suggestions, complaints or claims.

### ○ Contract performance

The Company processes personal data of data subjects for the purposes related to the fulfillment of contractual obligations of both parties, in particular the conclusion, amendments to, and termination of a contract, granting of powers of attorney by data subjects to the Company, conclusion of natural gas and electricity distribution contracts, supply of natural gas and electricity to the point of delivery, contracts for non-commodity products and services, invoicing, etc. The provision of personal data by a data subject to the Company in the necessary scope is a precondition for concluding a contract. A failure to provide personal data may prevent the Company from supplying the goods and services to a data subject. The Company will provide a data subject with information about which personal data is necessary for contract conclusion and which may be provided, for instance, for the purposes of improving communication efficiency.

The Company retains personal data for the purposes of performing a contract for the duration of a contractual relationship between the Company and a data subject and for the necessary time period after termination thereof. Following the termination of a contractual relationship and settlement of all liabilities arising from or related to the contract, the Company retains personal data for the time necessary, especially for the duration of statute of limitations applying to possible claims after the termination of a contractual relationship and the settlement of all liabilities (including initiated litigations), or possibly for a longer period if there is a suspension of the statute of limitations.

### ○ Fulfilment of legal obligation

The Company may process personal data, including provision thereof to state authorities and other entities, if such obligation arises to it by law, e.g. Act no. 251/2012 Coll. on energy, Act no. 71/2025 Coll. on the provision of data for the purposes of targeted energy assistance. If required by law, the Company may provide personal data to, for instance, the Office for Regulation of Network Industries, the Office for Personal Data Protection of the Slovak Republic, the Slovak Trade Inspection, the Ministry of the Interior of the Slovak Republic, the Ministry of Economy of the Slovak Republic, law enforcement bodies, tax authority, district offices, or other bodies or persons.

The Company processes customer personal data for the purposes of payments, invoicing and bookkeeping, in line with legal obligations arising from the following laws and legal acts:

- Act no. 431/2002 Coll. on accounting,
- Act no. 563/2009 Coll. on tax administration (Tax Code),
- Act no. 595/2003 Coll. on income tax,
- Act no. 222/2004 Coll. on value added tax,
- Act no. 609/2007 Coll. on excise duty on electricity, coal and natural gas,
- Act no. 98/2004 Coll. on excise duty on mineral oil,
- Act no. 483/2001 Coll. on banks,
- Act no. 492/2009 Coll. on payment services,
- Act no. 566/2001 Coll. on securities and investment services,
- Regulation (EU) no. 600/2014 on markets in financial instruments,
- Regulation (EU) no. 596/2014 on market abuse,
- Regulation (EU) no. 648/2012 on OTC derivatives, central counterparties and trade repositories.

The Company processes customer personal data for the purposes of selling energy and providing services to customers, including provision of customer care, resolution of suggestions, complaints or claims, as well as performance of activities of a bound financial agent as per legal obligations arising from the following legal acts:

- Act no. 251/2012 Coll. on energy,
- Act no. 250/2012 Coll. on regulation in network industries,



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- Act no. 108/2024 Coll. on consumer protection,
- Act no. 391/2015 Coll. on alternative resolution for consumer disputes,
- Act no. 186/2009 Coll. on financial intermediation and financial advice.

The Company processes customer personal data for the purposes of the internal system for reviewing reports of serious anti-social activities and keeping relevant records, as per legal obligations arising from the following legal act:

- Act no. 54/2019 Coll. on the protection of whistleblowers.

The Company processes personal data for the purposes of fulfilling obligations related to preventing and detecting money laundering and terrorist financing:

- Act no. 297/2008 Coll. on protection against money laundering and on terrorist financing, amending and supplementing certain acts.

The Company stores personal data for the purposes of fulfilling a legal obligation for no longer than the period necessary to fulfil the applicable legal obligation set out by generally binding legal regulations.

- Consent granted by the data subject

Where no other legal bases can be applied, the Company processes personal data of data subjects based on the consent expressly granted by a data subject.

The Company retains personal data processed based on the consent of a data subject for no longer than the duration of such consent, or until revocation thereof, whichever occurs first. A data subject is entitled to freely revoke his/her consent to personal data processing at any moment. If the consent is revoked, personal data may not be processed further, provided there exists no other processing purpose based on some other legal basis. The revocation of consent shall be without prejudice to the lawfulness of processing based on such consent prior to the withdrawal thereof.

#### 4 Who are the recipients of personal data?

The Company uses third parties, so-called processors, to process personal data, which third parties were authorised by us to process it on behalf of the Company. This includes the following categories of processors: (i) authorised dealers, (ii) providers of call centre services, (iii) consulting companies and agencies, (iv) collection agencies, (v) servicing providers, (vi) customer advisory providers, (vii) insurance companies, (viii) delivery and courier services, (ix) security service providers, (x) green solution service providers, (xi) providers of IT services. The processors process personal data for the Company exclusively on the basis of a personal data processing agreement that must meet the requirements established by the Regulation and the Personal Data Protection Act. In such cases, the Company strictly ensures the protection of personal data provided by it to the processors.

SPP's processors that process personal data in the United States of America:

The Rocket Science Group LLC d/b/a MailChimp	675 Ponce de Leon Ave NE, Suite 5000, 30308 Atlanta, Georgia, USA
SurveyMonkey Inc.	One Curiosity Way, 94403 San Mateo, California, USA

#### 5 SPP as a joint controller

The Company, as the founder of the SPP Foundation, with the registered office at Mlynské nivy 44/a, 825 11 Bratislava, ID no.: 31 818 625 (hereinafter the "**Foundation**"), processes certain personal data of grant applicants, grant recipients, other persons involved in grant implementation, job applicants, and Foundation employees and this the purposes of promoting the Foundation, its activities and the SPP brand, as well as for the purpose of exchanging knowledge and know-how between joint controllers in the field of human resources. For this purpose, the Company processes the first name, surname, address and video and audio-visual recordings capturing the data subjects, as well as other personal



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data required to achieve the processing purpose. The Company and the Foundation have designated the following contact point for data subjects: [osobneudaje@nadaciaspp.sk](mailto:osobneudaje@nadaciaspp.sk); however, data subjects may also approach the Company with their requests directly.

The Company, as the founder of Ekofond SPP, n.o. with the registered office at Mlynské nivy 4924/44a, 821 09 Bratislava, ID no.: 52 116 166 (hereinafter the “**Ekofond**”), processes certain personal data of natural persons participating in community-benefit activities, job applicants, and Ekofond employees and this the purposes of promoting Ekofond, its activities and the SPP brand, as well as for the purpose of exchanging knowledge and know-how between joint controllers in the field of human resources . For this purpose, the Company processes the first name, surname, address, e-mail address, landline and mobile phone number, video and audio-visual recordings capturing the data subjects, as well as other personal data required to achieve the processing purpose. The Company and Ekofond have designated the following contact point for data subjects: [osobneudaje@ekofondspp.sk](mailto:osobneudaje@ekofondspp.sk); however, data subjects may also approach the Company with their requests directly.

### 6 What are the rights of data subjects?

The data subject has the right:

- to request from the Company:
  - confirmation of whether or not his/her personal data is being processed; if no personal data has been obtained from the data subject, the data subject may request the provision of any available information as concerns its source (“**right of access to personal data**”);
  - if his/her personal data is being processed, to gain access to such personal data and other information, as well as to receive a copy of the personal data processed by the Company (“**right to be informed about processing**”); The Company is entitled to charge the data subject a reasonable administrative fee in connection with his/her request for a copy of personal data;
  - rectification of inaccurate/incomplete personal data processed by the Company (“**right to rectification**”);
  - erasure of personal data, if any of the reasons listed in the Regulation or Personal Data Protection Act is met; in particular, if personal data is no longer necessary for the purposes, for which the Company previously acquired or processed it, if the data subject withdraws his/her consent and the Company has no other legal basis for processing, if the data subject objects to processing, or if the Company processed personal data illegally; where official documents containing personal data are being processed, the data subject may request the return thereof (“**right to erasure**”);
  - restriction of personal data processing, if any of the reasons listed in the Regulation or the Personal Data Protection Act is met; for example, if a data subject notifies the Company that it processes inaccurate personal data about him/her, s/he may request that such personal data is not processed until it is rectified (“**right to restriction**”);
  - disclosure of personal data relating to the data subject, and which data s/he has provided to the Company, in a structured, commonly used and machine-readable format; the data subject has the right to transmit such personal data to another controller, if it is technically possible and if the conditions listed in the Regulation and the Personal Data Protection Act are met (“**right to**



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portability”);

- to object, on grounds relating to the data subject’s particular situation, to the processing of his/her personal data, which relate to him/her and is necessary to fulfill a task carried out in the public interest, including objecting to profiling; to object to the processing of his/her personal data for the purposes of direct marketing without his/her consent, including profiling, to the extent it relates to such direct marketing (“**right to object**”);
- to object to being subjected to the Company’s decision-making that is based solely on automated processing, including profiling, having legal effects that concern him/her or significantly affect him/her in a similar manner, unless the Regulation or the Personal Data Protection Act provide otherwise (“**automated decision-making, including profiling**”);
- to withdraw at any time his/her consent to personal data processing granted to the Company, coming into effect at the moment such consent is withdrawn (“**right to withdraw consent**”);
- in case of any suspected illegal processing of his/her personal data, to file a motion for initiation of personal data protection proceedings with the Personal Data Protection Office of the Slovak Republic, with the registered office at Galvaniho Business Centrum II, Galvaniho 7/B, Bratislava, Slovak Republic, phone: +421 2 3231 3214 or +421 2 3231 3249, [www.dataprotection.gov.sk](http://www.dataprotection.gov.sk).

If a data subject does not have full legal capacity, his/her rights may be exercised by a legal representative, in accordance with the Regulation and the Personal Data Protection Act. The rights under the Regulation and the Personal Data Protection Act of a deceased data subject may be exercised by its close living relative.

### 7 How can data subjects exercise their rights?

With regard to the possible risks of misuse, and to protect the personal data of data subjects, the Company establishes communication means, which allow receiving and responding to a request by the data subject relating to his/her personal data that is processed by the Company. The Company also takes into account the technical aspects of certain data subject’s rights and adapts its communication means to protect these rights of the data subject. In case of any doubt as to the identity of the data subject, the Company is entitled to require additional identity verification.

The data subject may exercise his/her rights in the following ways:

- in person at any SPP Customer Centre;
- by post mail (usually, the data subject’s signature must be officially certified) sent to the address of the registered office of the Company;
- by e-mail sent to the Company’s e-mail address [osobneudaje@spp.sk](mailto:osobneudaje@spp.sk);
- by calling the SPP Customer Line (only the right to rectification and the right to withdraw consent).

### 8 What is automated decision-making and profiling?

In some cases, the Company performs automated processing of personal data in the form of profiling the personal data of the data subject, consisting of using personal data to analyse and evaluate certain personal aspects related to the data subject for the purposes of energy sales, direct marketing and satisfaction surveys. In such cases, the Company will notify the data subject of such processing in an appropriate manner.

For this purpose, the Company may inform the data subject about the most suitable business and marketing offers.

The Company performs in-depth analysis and evaluation of the data subject’s personal data, which s/he has provided to the Company and/or which the Company has obtained in the course of providing products and services.

Such analyses are performed by the Company on the basis of legitimate interests aimed at tailor-made



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offers of the Company's products and services and the overall improvement of its products and services.

As concerns the data subject, such processing results in the customisation of the Company's offerings and services to best reflect the data subject's needs.

### 9 Cookies

In accordance with the provisions of § 109 Section 8 of Act no. 452/2021 Coll. on electronic communications, in the interest of providing transparent, clear and comprehensible information about the handling of the information and personal data of users of its website, SPP provides visitors of the website [www.spp.sk](http://www.spp.sk) with the following information on the use of data stored on the user's end device, the so-called cookies (hereinafter the "**Cookies**"). We can store or gain access to Cookies on your device only on the basis of your demonstrably granted consent. Consent is not required for Cookies that are absolutely necessary to ensure the functioning of the website [www.spp.sk](http://www.spp.sk).

#### What are Cookies?

Cookies are small data packages or small text files that are stored on your device, which you use to browse the website [www.spp.sk](http://www.spp.sk). Cookies are used to improve user experience on the website and to ensure certain website functionalities. For example, they allow us to identify that you visit our website repeatedly from your device, which allows us to offer you content that corresponds to your previous visits. Cookies also allow us to ensure proper functioning of the website [www.spp.sk](http://www.spp.sk) and thanks to them we can improve its functionality and our services for you.

#### What types of Cookies do we use and for what purpose?

Cookies can be broken down by the time period, for which they are stored on your device, or by the purpose, for which they are stored.

With respect to the time period, for which the Cookies are stored on your device, we divide Cookies into two basic categories, namely temporary and permanent ones. Temporary Cookies are used only for the purposes of one specific visit to our website. They mainly serve to identify the type of your device (computer, tablet, mobile phone) when repeatedly loading parts of our website within one visit. They help us to improve your browsing experience. Once the website browser is closed, temporary Cookies are removed from your device. Permanent Cookies help us recognise you as a unique user of our website and remain stored on your device until their predetermined validity period expires or until you delete them. Moreover, permanent Cookies enable us to provide you with personalised content of our website during your next visit.

In terms of purpose, we use Cookies in multiple ways while these Cookies are divided as follows:

- **Required Cookies** ensure the basic usability of the website and the website would not function properly without using them. This includes, for example, features such as website navigation etc.
- **Preferential Cookies** enable storing information about the user's preferred use of the website. This includes, for example, the selection of preferred language, etc.
- **Analytical Cookies** help us better understand the behaviour of visitors and users of the website, thereby improving the functionality of this website. Analytical Cookies can create anonymous statistics.
- **Marketing Cookies** enable personalisation of the marketing content on this website. They are primarily used to display relevant advertising to the user or website visitor.
- **Unclassified Cookies** are those that we are currently implementing on the website and, therefore, we are presently assigning them to the aforementioned categories.

In connection with Cookies, our website also uses the Google Analytics service. If you are interested in



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more details about how this service uses Cookies, please visit the [Google Analytics website](#).

### **When do we use Cookies and what to do if you do not agree to their use?**

We use Cookies only if you have granted explicit consent to their use through the so-called Cookies bar. We do not use Cookies until you grant such consent. However, consent is not required for Cookies that are essentially necessary to ensure the functioning of the website [www.spp.sk](http://www.spp.sk).

You can grant, change or revoke your consent to the use of particular Cookie categories at any time in the Cookies settings window (the so-called cookies bar) in the “Details” section. You can reopen this window at any time using the button located in the lower corner of the website.

Please note that due to how our website is set up, refusing to grant consent to the use of certain Cookie categories may affect its functionality and prevent you from making use of certain features.