

Privacy Policy

Introduction - General Data Protection

Information on the processing of personal data according to Act No. 18/2018 Coll. on General Data Protection

1. Controller of Information system is corporation SAPPS, a. s., registered seat: Alžbetin Dvor 909, 90042, Miloslavov IČO: 51 036 649, incorporated under the Trade Register of the District Court of Bratislava I, section: Sa, File No: 6638/B (hereinafter referred to as „controller“).
2. Purposes of processing: creation of a user account for the customer in the Information System in order to access the ordered vehicle report.
3. List of processed personal data:
 1. **natural persons:**
 - a. a) name and surname
 - b. b) e-mail address
 2. **legal entities:**
 - c. c) business name
 - d. d) e-mail address
 - e. e) (a legal entity may provide registered seat, business identification number or VAT number as its billing details upon registration, as they shall be stated on issued invoice).
4. **All** data, provided by personal data subjects through the Website, are stored on a secured server. Data controller shall make every effort to protect the data and personal data of the data subjects.
5. **Identity/ belonging to an authorized person:** Personal data of data subjects is processed through web seat www.vin-check.eu.
6. **Information on the obligation or willingness to provide the required personal data and retention period of personal data:** provides the personal data voluntarily to the Information System, based on pre-contractual relationship, as personal data is necessary for identification of Customer as a party of the contract. Personal data shall be processed for a maximum period of 2 years from the day when consent was obtained, while the person concerned shall have the right to withdraw his consent at any time. This can be done in written or by e-mail: info@vin-check.eu.
7. **Processing of personal data for marketing purposes:** The Operator shall not process any personal data of the data subject for marketing purposes or use the data subject's e-mail address for the purpose of sending newsletters.
8. **Form of data publication:** The personal data of the data subjects shall not be disclosed.
9. **Transfer of personal data to third countries:** Personal data is not transferred to third countries or any other countries in EU.
10. **Information on the personal data of the data subjects:** The controller undertakes to treat the personal data of the data subjects according to legal regulations of the Slovak Republic.

Controller according to Art. 24 of GDPR and Section 31 of the Act adopted appropriate technical, organizational, personnel and security measures and guarantees, which take into account in particular:

1. the principles of the processing of personal data, such as legality, fairness and transparency, limitations and compatibility of the purposes of the processing of personal data, furthermore the minimization of personal data, their pseudonymization and encryption, as well as integrity, confidentiality and availability;

2. the principles of necessity and proportionality (including the scope and quantity of personal data processed, the retention period and access to the data of the data subject) of the processing of personal data regarding the purpose of the processing operation;
3. the nature, extent, context and purpose of the processing operation;
4. the resistance and ability to recover of personal data processing systems;
5. information from the authorized persons of the operator;
6. take measures to ascertain without delay whether there has been a breach of personal data protection and to promptly inform the supervisory authority and the responsible person;
7. taking measures to ensure the correction or erasure of incorrect data or the realization of other rights of the data subject;
8. risks of varying probabilities and seriousness for the rights and freedoms of natural persons (in particular accidental or unlawful destruction of personal data, loss or alteration of personal data, misuse of personal data - unauthorized access or unauthorized disclosure, risk assessment with regard to origin, nature, probability and the severity of the risk associated with processing and to identify best risk mitigation practices).

Information on the purpose of the processing and the retention period of personal data

One of the principles of personal data processing is the purpose limitation principle. Pursuant to this principle, personal data may only be collected for a specific, explicit and legitimate purpose and may not be further processed in a way incompatible with that purpose. The processing of personal data should be closely linked to the purpose of the processing of personal data, in particular as regards the list or extent of the processed personal data which should be necessary in order to achieve the purpose by processing the personal data. It is not allowed for the list or scope of personal data to be artificially or additionally expanded in relation to the purpose. If the purpose and the list or scope of personal data are laid down by law, it must be respected, if the list or scope of processed personal data is determined by the controller, it should take care not to unnecessarily extend it beyond the purpose.

The Personal Data Protection Act lays down an obligation for the controller to provide the data subject with information about the purpose of processing personal data for which his personal data are intended, even if the personal data are not obtained directly from the data subject. This information must be provided to the data subject in advance or when receiving his or her personal data at the latest, clearly and comprehensibly and in such a way as to enable him or her to actually become aware and understand the information.

The period of retention of personal data is determined by the applicable law that applies to the document in accordance with the filing period according to the registry record. Please do not hesitate to contact us and we will let you know the exact retention period for the specific document.

Rights of the data subject

According to 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, repealing Directive 95/46/EC

(hereinafter referred to as "GDPR") you as a personal data of data subject have guaranteed following rights:

1. Right of access by the data subject:

1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:
 - (a) the purposes of the processing
 - (b) the categories of personal data concerned;
 - (c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;

- (d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period
 - (e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
 - (f) the right to lodge a complaint with a supervisory authority;
 - (g) where the personal data are not collected from the data subject, any available information as to their source
 - (h) the existence of automated decision-making, including profiling, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
2. Where personal data are transferred to a third country or to an international organization, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.
 3. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.
 4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others

2. Right to rectification:

1. The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her.
2. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

3. Right to erasure ('right to be forgotten'):

1. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:
 - a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - b) the data subject withdraws consent on which the processing is based, and where there is no other legal ground for the processing;
 - c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);
 - d) the personal data have been unlawfully processed;
 - e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
 - f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1);
2. Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.
3. Paragraphs 1 and 2 shall not apply to the extent that processing is necessary:
 - a) for exercising the right of freedom of expression and information;

- b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- c) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3);
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing;
- e) for the establishment, exercise or defence of legal claims

4. Right to restriction of processing:

1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:
 - a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
 - b) the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
 - c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
 - d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject
2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.
3. A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted.

5. Notification obligation regarding rectification or erasure of personal data or restriction of processing:

1. The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort.
2. The controller shall inform the data subject about those recipients if the data subject requests it.

6. Right to data portability:

1. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:
 - a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and
 - b) the processing is carried out by automated means
2. In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.

7. Right to object:

1. The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller 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.
2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.
3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.
4. At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.
5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.
6. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), 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, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

8. Automated individual decision-making, including profiling:

1. The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.
2. Paragraph 1 shall not apply if the decision:
 - a) is necessary for entering into, or performance of, a contract between the data subject and a data controller;
 - b) is authorized by Union or Member State law to which the controller is subject, and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
 - c) is based on the data subject's explicit consent.
3. In the cases referred to in points (a) and (c) of paragraph 2, the data controller shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and to contest the decision.
4. Decisions referred to in paragraph 2 shall not be based on special categories of personal data referred to in Article 9(1), unless point (a) or (g) of Article 9(2) applies and suitable measures to safeguard the data subject's rights and freedoms and legitimate interests are in place.

9. The right of the data subject to file a motion to initiate proceedings according to § 100 of the Personal Data Protection Act:

1. the right of the Data subject who considers that his / her personal data have been unauthorized or that his / her personal data have been misused, to file a objection with the Office for Personal Data Protection of the Slovak Republic (hereinafter referred to as "the Office") to initiate proceedings on the protection of personal data;

2. This objection can be submitted in writing, personally, by electronic means, and must be signed by a guaranteed electronic signature. When objection is submitted by telegraph or by telefax, submitting must be completed in writing or personally within 3 days;
3. **Submitted proceeding in accordance with § 100 Art. 3 of the Personal Data Protection Act must contain:**
 1. the name, surname, permanent address and signature of objecting person;
 2. identification of person, against who is objection submitted; name or surname, registered office or permanent residence or legal form and identification number;
 3. the subject-matter of the objection, indicating which rights, according to the objecting person, have been infringed in the processing of personal data;
 4. evidence to support the claims made in the proposal;
 5. a copy of the document proving the exercise of the right under § 28, if such a right could be exercised, or an indication of reasons worthy of special consideration;
4. The Office shall then decide on the petitioner's proposal within 60 days of the date of the opening of the proceedings. In justified cases, the Office may extend this period accordingly, but not more than 6 months. The Office shall inform all the parties in writing of the extension of the time limit;