

PRIVACY POLICY – citizens [subjects of journalism] News and Media Holding, a.s., Einsteinova 25, Bratislava 85101, ID: 47256281, Registered in the Commercial Register of District court Bratislava I., Sec.: Sro, Insert no: 6074/B, (henceforward as 'NMH')

PRIVACY POLICY - CITIZENS [SUBJECTS OF JOURNALISM]

We respect the privacy of all affected persons with whom we are in contact at NMH, regardless of whether we process personal data ourselves or with the help of third-parties. It is important to us that you know which personal data we process about you, why we do it and what your rights are. Therefore, we ask you to read this privacy policy, which will provide you with more information about the processing of your personal data.

CATEGORIES OF PERSONAL DATA - CONTROLLER

Area	Operation	Types of personal data
Journalistic license	Data storage in CMS	Likeness, photos, print screens of text posts on social networks

PURPOSES OF DATA PROCESSING - CONTROLLER

NMH will process your data for the following purposes:

Operation	Purpose	Legal basis

Data storage in CMS	<p>Streamlining the presentation on the websites of individual newsrooms - we process your personal data for the purpose of carrying out our business activities, consisting primarily of journalistic work and informing the public through mass media, while within this activity we also exercise our right to freedom of expression and enable the exercise of the public's right to information in accordance with Art. 26 of the Constitution of the Slovak Republic. Journalistic activity is a broad term and includes "all activities, if their purpose is to make information, opinions, or ideas available to the public, regardless of the method of their transmission. They are not reserved only for the operator of mass communication means and can be connected with a profit-making purpose" (paragraph 61 of the reasoning of the decision of the Court of Justice of the European Union in case no. C-73/07 Tietosuojavaltutettu v. Satakunnan Markkinaporssi Oy and Satamedia Oy dated 16.12.2008). The above is confirmed by the GDPR itself (EU Regulation on the protection of personal data, see below) in recital 153 (last sentence) as follows: In order to take into account the importance of the right to freedom of expression in every democratic society, it is necessary to interpret terms related to this freedom, for example journalism, in a broad sense meaning.</p>	<p>- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.</p>
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In the case that we process your personal data on the legal basis of fulfilling our legal obligation, the following legal regulations may apply:

Name of Act
Act No. 18/2018 Z.z. - Personal Data Protection Act

PARTIES THAT MAY HAVE ACCESS TO YOUR DATA

NMH as the controller may share your data with third-parties in the following cases:

Operation	Purpose	Recipients
Data storage in CMS	Streamlining the presentation on the websites of individual newsrooms - we process your personal data for the purpose of carrying out our business activities, consisting primarily of journalistic work and informing the public through mass media, while within this activity we also exercise our right to freedom of expression and enable the exercise of the public's right to information in accordance with Art. 26 of the Constitution of the Slovak Republic.	- DigitalOcean, LLC

In such cases, these third parties may only process your personal data for the stated purposes and only in accordance with our instructions or applicable law. Our employees will also have access to your personal data. In such a case, access will only be granted if necessary for the stated purposes and only if the employee is bound by an obligation of confidentiality.

LOCATION OF YOUR PERSONAL DATA

Authorized employees of NMH will have access to your personal data in the Slovak Republic within the European Union, and the European Economic Area. If processing takes place outside the EU, the following cases apply.

Operation	Purpose	Country	Company
Data storage in CMS. DigitalOcean is a technical solution provider.	Streamlining the presentation on the websites of individual newsrooms - we process your personal data for the purpose of carrying out our business activities, consisting primarily of journalistic work and informing the public through mass media, while within this activity we also exercise our right to freedom of expression and enable the exercise of the public's right to information in accordance with Art. 26 of the Constitution of the Slovak Republic.	United States of America	DigitalOcean, LLC, ID: 38-4017666, 101 Avenue Of The Americas, New York, 10013 USA

DigitalOcean is a United States-based multinational technology company and cloud service provider. The Content Management System (or 'CMS'), specifically the image content of our websites, is operated by the cloud services of DigitalOcean. Personal data of citizens of the European Union is processed through servers within the European Union. Nevertheless, a transfer of your data to the United States may occur, and such a transfer would be deemed not secure, if additional measures would not apply. Therefore, DigitalOcean has implemented standard contractual clauses adopted by the European Commission to ensure safe EU-US data transmission, as well as additional state of art security measures, thus making the data transfer transfer legal, and secure. For more information, please visit the DigitalOcean website - <https://www.digitalocean.com/legal/data-processing-agreement>.

RETENTION PERIOD - CONTROLLER

We only keep your personal data for a limited time and delete it when it is no longer necessary for the processing purposes set out in this statement.

Operation	Retention period
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Data storage in CMS.	Stored for the duration of the article's existence on the website. The controller has established mechanisms for assessing the requests of data subjects to withdraw content.
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We may process your personal data for a longer period of time, in the event of an ongoing legal dispute, or if you have given us your consent.

WHAT ARE YOUR RIGHTS

Under the Personal Data Protection Act, you have certain rights in relation to processing of your personal data. Here is a list of these rights, as well as their broader meaning.

Right to Access

You can request information about how we process your personal data, including information about:

- Why we process your personal data
- What categories of PD do we process?
- Who we share your PD with
- How long do we keep your personal data or the criteria for determining this period
- What are your rights
- Where did we get your personal data from (if we didn't get it from you)
- If the processing includes automated decision-making (so-called profiling)
- If your personal data has been transferred to a country outside the EEA, how will we ensure the protection of your personal data.

All of the above information is available in this Privacy Policy.

You can also request a copy of the personal data we process about you. However, additional copies will be charged.

Right to Rectification

It is important that we have correct information about you, and that we ask that you notify us if any of your personal information is incorrect, for example if you have changed your name or you have recently moved.

Right to erasure

If we process your personal data in an unlawful manner, for example if we process your personal data for longer than necessary or without reason, you can ask us to delete that data.

Right to restriction

of processing

From the moment you have requested the correction of your personal data, or objected the processing, and until we are able to investigate the problem, or confirm the accuracy of your personal data (or change it according to your instructions), you are entitled to limited processing. This means that we (with the exception of personal data retention) may only process your personal data in accordance with your consent, if it is necessary in connection with legal claims, to protect the rights of someone else, or if there is an important public interest in the processing.

You can also request that we restrict the processing of your personal data if the processing is unlawful, but you do not want us to delete the personal data.

Right to object

If you believe that we do not have the right to process your personal data, you can object to our processing. In such cases, we can only continue processing if we can demonstrate compelling legitimate interests, that outweigh your interests, rights and freedoms. However, we may always process your personal data if it is necessary to determine, exercise or defend legal claims.

Right to data portability

You may request that your personal data, which you have provided to us for processing based on consent or to fulfill a contract, be provided to you in a structured, commonly used, and machine-readable format. You also have the right to request the transfer of this information to another data controller.

Withdrawal of consent

You have the right to withdraw your consent and we will subsequently stop our processing activities based on this legal basis.

We will also inform other parties to whom we may have provided your personal data about your request/requests.

In case of doubt, you have the right to submit a proceedings initiation pursuant to § 100 of the Personal Data Protection Act to the relevant supervisory authority, for example through www.dataprotection.gov.sk.

HOW CAN I COMPLAIN ABOUT THE USE OF MY DATA OR EXERCISE MY RIGHTS?

If you wish to make a complaint about how we process your personal data, including in relation to the aforementioned rights, you can contact our Data Protection Officer ("DPO") and your suggestions and requests will be checked.

Contact the Data Protection Officer on: gdpr@newsandmedia.sk .

If you are not satisfied with our answer, or if you believe that we are processing your data unfairly or illegally, you can complain to the relevant supervisory authority, which is the Úrad na ochranu osobných údajov (ÚOOÚ). You can find more information about ÚOOÚ and their complaints procedure here: www.dataprotection.gov.sk.

CONTACT DATA

If you have any further questions regarding the processing of your personal data, you can contact us through our Data Protection Officer (DPO) by email to gdpr@newsandmedia.sk .