



# Information on the processing of personal data

in accordance with Articles 12, 13, and 14 of the GDPR  
(hereinafter referred to as "Information")

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This Information describes how the operator BARKRO s. r. o., with its registered office at Obchodná 559/37, Bratislava - Staré Mesto municipal district 811 06, Company ID: 52 797 406, registered in the Commercial Register of the District Court Bratislava I, section: Sro, insert no.: 142679/B (hereinafter referred to as "the operator") processes personal data. If anything from this Information is unclear or incomprehensible to you, we are happy to explain any term or section. Personal data are processed in accordance with the requirements of the GDPR, Act No. 18/2018 Coll. on the protection of personal data and on amendments to certain acts as amended by later regulations, and other generally binding legal provisions.

## 1. BASIC CONCEPTS

**a. Personal Data** – any information relating to an identified or identifiable natural person, such as name, surname, date of birth, identification number, telephone number, email address, IP address, etc.

**b. GDPR** – 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).

**c. Data Subject** – a natural person whose personal data are processed.

**d. Processing of Personal Data** – any operation or set of operations which is performed on personal data by the controller or processor.

**e. Controller** – a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

**f. Purpose of Processing Personal Data** – a clearly defined or established intention of processing personal data, which is related to a certain activity.

**g. Legitimate Interest** – the interest of the controller or a third party, from which the need to process personal data arises, if it does not outweigh the interests or fundamental rights and freedoms of the data subject.

**h. Recipient** – a natural or legal person, public authority, agency or another body to which the personal data are disclosed.

## 2. PERSONAL DATA CONTROLLER

The personal data controller is:

Controller:	<b>BARKRO s. r. o.</b>
Legal form:	Limited Liability Company
Registered Office:	Obchodná 559/37, Bratislava – Staré Mesto municipal district, 811 06, Slovak Republic
Email:	info@barkro.com
Telephone number:	+421951245740

## 3. PURPOSES AND LEGAL BASES FOR PROCESSING

Purpose	Legal Basis
Accounting	Art. 6 (1) (c) GDPR – compliance with a legal obligation Art. 6 (1) (b) GDPR – performance of a contract
GDPR compliance	Art. 6 (1) (c) GDPR – compliance with a legal obligation

Supplier/Customer contracts	Art. 6 (1) (b) GDPR – performance of a contract
Contact form	Art. 6 (1) (f) GDPR – legitimate interest
Corporate profile on Facebook	Art. 6 (1) (f) GDPR – legitimate interest
Corporate profile on Instagram	Art. 6 (1) (f) GDPR – legitimate interest
Corporate profile on TikTok	Art. 6 (1) (f) GDPR – legitimate interest
Viber	Art. 6 (1) (f) GDPR – legitimate interest
Telegram	Art. 6 (1) (f) GDPR – legitimate interest
WhatsApp	Art. 6 (1) (f) GDPR – legitimate interest
GPS locator	Art. 6 (1) (b) GDPR – performance of a contract Art. 6 (1) (a) GDPR – consent
Website (cookies)	Art. 6 (1) (a) GDPR – consent
Surveillance system	Art. 6 (1) (f) GDPR – legitimate interest
Newsletter	Art. 6 (1) (a) GDPR – consent
References	Art. 6 (1) (a) GDPR – consent
Consumer contest	Art. 6 (1) (a) GDPR – consent

## 4. LEGITIMATE INTERESTS OF THE CONTROLLER OR A THIRD PARTY

Legitimate Interest	Characteristic
Contact form	Legitimate interest of the controller to process personal data voluntarily provided by data subjects for the purpose of establishing mutual communication (name, surname, date of birth, identification number, driver's license number, passport number, telephone number, residential address, email address, bank card details (credit or debit))

Corporate profile on Facebook	Legitimate interest of the controller to present the services offered on its corporate profile
Corporate profile on Instagram	Legitimate interest of the controller to present the services offered on its corporate profile
Corporate profile on TikTok	Legitimate interest of the controller to present the services offered on its corporate profile
Viber	Legitimate interest of the controller to process personal data voluntarily provided by data subjects for the purpose of establishing mutual communication or potentially concluding a contract
Telegram	Legitimate interest of the controller to process personal data voluntarily provided by data subjects for the purpose of establishing mutual communication or potentially concluding a contract
WhatsApp	Legitimate interest of the controller to process personal data voluntarily provided by data subjects for the purpose of establishing mutual communication or potentially concluding a contract
GPS locator	Legitimate interest of the controller for the purpose of protecting its property (leased car)
Surveillance system	Security and protection of the controller's property

## 5. RECIPIENTS

A recipient is any person to whom the controller makes personal data available, regardless of whether they are a third party. Depending on the individual purposes of processing, the data processed by the controller are made available to the following recipients:

- Individuals who process personal data under the direct authority of the controller (employees, persons working under agreements outside of employment, etc.)
- Processors (web hosting provider, accounting company);
- Joint controller of the surveillance system;
- Director(s);
- Members of the company's bodies (partners);
- State authorities (tax office, Social Insurance Agency, Labour, Social Affairs and Family Office, Personal Data Protection Office, courts, criminal prosecution bodies, misdemeanor authorities, etc.);
- Health insurance companies, bailiffs, supplementary pension savings companies, pension management companies, employee representatives;
- Car repair companies;
- All partner companies within the vehicle leasing framework;
- Other authorized entities may also be recipients.

We may also use third-party website analytics tools (e.g., Google Analytics) that collect information about the visitors to our websites. The information that we may collect through automated means includes:

- Information about the devices our visitors use to access the internet (e.g., the IP address and the device, browser, and operating system type);
- URLs that refer visitors to our sites;
- Dates and times of visits to our sites;
- Information on actions taken on our sites (e.g., page views and site navigation patterns);
- General geographic location (e.g., country and city) from which a visitor accesses our websites;

- Search terms that visitors use to reach our sites.

## 6. TRANSFER TO A THIRD COUNTRY AND INTERNATIONAL ORGANIZATION

The controller does not generally transfer personal data to a country outside the EU (EEA) territory except for data transfers that occur when the data subject visits/uses the controller's corporate profile on social media networks like Facebook. In such cases, personal data are transferred to the United States of America, and the data protection guarantees are provided by standard contractual clauses. More information can be obtained here: **Facebook, Instagram, TikTok. Viber, Telegram, WhatsApp.**

## 7. RETENTION PERIOD

Personal data in a form that allows identification are kept for no longer than necessary to achieve the purpose for which the personal data are processed. Retention periods/deletion times or criteria for determining them are documented in the records of processing activities, which we will provide upon your request.

## 8. RIGHTS OF THE DATA SUBJECT

Data subjects have the following rights:

### a. Information on the processing of personal data

The information primarily includes the identity and contact details of the controller, purposes of processing, categories of personal data concerned, recipient or categories of recipients, information on the transfer of personal data to third countries, retention period of personal data, authorized controllers, enumeration of your rights, the possibility to lodge a complaint with the Personal Data Protection

Office of the Slovak Republic, the source of the processed personal data, information on whether and how automated decision-making and profiling occur.

#### **b. Right of access to personal data**

You have the right to confirmation as to whether or not personal data are being processed, and if so, access to information about the purposes of processing, categories of personal data concerned, recipients or categories of recipients, retention period of personal data, information on your rights, the right to lodge a complaint with the Personal Data Protection Office of the Slovak Republic, information on the source of personal data, information on whether automated decision-making and profiling occur, information and guarantees in case of transfer of personal data to a third country or international organization. You have the right to obtain a copy of the processed personal data.

#### **c. Right to rectification**

The data subject has the right to have inaccurate personal data corrected. Considering the purposes of the processing, the data subject has the right to have incomplete personal data completed, including by providing a supplementary statement.

#### **d. Right to erasure (right to be forgotten)**

In some cases defined by law, we are obliged to erase the personal data of the data subject. However, each request is subject to individual assessment to determine if the conditions are met, as we, as the controller, may be bound by a legal obligation or may process personal data based on a legitimate interest. If our legitimate interest (or the legitimate interest of a third party) outweighs the interests of the data subject, we are entitled to continue processing personal data for the relevant purpose.

#### **e. Right to restriction of processing**

The data subject may request the controller to restrict the processing of personal data if one of the following applies:



- The data subject contests the accuracy of personal data, for a period enabling the controller to verify the accuracy of personal data;
- The processing is unlawful, and the data subject opposes the erasure of the personal data and requests instead the restriction of their use;
- 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 defense of legal claims;
- The data subject has objected to processing based on specific situations under GDPR (task carried out in the public interest, legitimate interest of the controller, or profiling) until it is verified whether the legitimate grounds of the controller override those of the data subject.

#### **f. Right to data portability**

If the data subject requests, we transfer their personal data to another controller, we will provide the personal data in an appropriate format, if no legal or other significant obstacles prevent us from doing so, to the designated entity.

#### **g. Right to object and automated individual decision-making**

The data subject has the right to object at any time to the processing of personal data concerning them, which is carried out on the legal basis of public interest or legitimate interest. The data subject may at any time object to the processing of personal data by the controller for direct marketing purposes, including profiling to the extent that it is related to such direct marketing.

#### **h. Processing based on consent (right to withdraw consent)**

If the processing is based on the consent of the data subject under Article 6(1)(a) GDPR or Article 9(1)(a) GDPR, data subjects have the right to withdraw their consent at any time. Such withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

#### **i. Right to lodge a proposal, initiative, complaint with the supervisory authority**

Data subjects can at any time lodge a proposal, initiative, or complaint regarding the processing of personal data with the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic, located at Hraničná 12, 820 07 Bratislava 27, Slovak Republic, tel. no.: +421/2/3231 3220, website: [www.uoou.sk](http://www.uoou.sk).

#### - Response Time

We will provide a response and, where applicable, information on the measures taken as soon as possible, but no later than one month. We are entitled to extend this period by two months if necessary, considering the complexity and number of requests. We will inform the data subject of any such extension, including the reasons for it.

#### - Contact Point

Data subjects can exercise their rights with the controller via email at: [info@barkro.com](mailto:info@barkro.com) or in writing to the postal address: BARKRO s.r.o., Obchodná 559/37, Bratislava – Staré Mesto municipal district, 811 06, Slovak Republic.

All notifications and statements regarding the exercised rights are provided free of charge. However, if a request is manifestly unfounded or excessive, particularly because it is repetitive, we are entitled to charge a reasonable fee reflecting administrative costs or refuse to act on the request. In case of repeated requests for copies of processed personal data, we reserve the right to charge a reasonable fee for administrative costs.

## 9. PROVISION OF PERSONAL DATA

The provision of personal data is voluntary, meaning that as a controller, being a private legal entity, we do not require data provision by law. However, if you wish to enter into a contract with us, providing personal data may be necessary for the conclusion of the contract. In such cases, providing data is a contractual requirement. The data subject is not obligated to provide their personal data; it is done voluntarily. Refusal to provide personal data does not have negative consequences for the data subject.

## 10. AUTOMATED DECISION-MAKING AND PROFILING

The controller does not use automated individual decision-making, including profiling.

## 11. PROCESSING FOR ANOTHER PURPOSE

In processing, we adhere to the principle of limitation of purpose, meaning that data is processed only for a specifically determined, explicitly stated, and legitimate purpose except when processing for a compatible purpose. Processing for another purpose may also be based on the consent of the data subject, the law of the European Union or the Slovak Republic. To determine whether another purpose is compatible with the purpose for which the personal data were originally collected, we will perform a so-called compatibility test, considering:

- a.** Any link between the purposes for which the personal data were collected and the purposes of the intended further processing;
- b.** The context in which the personal data were collected, especially regarding the relationship between data subjects and the controller;
- c.** The nature of the personal data, especially whether special categories of personal data according to Article 9 GDPR or personal data relating to criminal convictions and offences according to Article 10 GDPR are processed;
- d.** The possible consequences of the intended further processing for data subjects;
- e.** The existence of appropriate safeguards, which may include encryption or pseudonymization.

## 12. OVERVIEW OF SELECTED LEGAL REGULATIONS IN THE FIELD OF PERSONAL DATA PROTECTION

- Charter of Fundamental Rights of the European Union (Article 8)

- 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)

- Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications) (consolidated text)

- Act No. 351/2011 Coll. on electronic communications as amended

- Constitution of the Slovak Republic (published under No. 460/1992 Coll.)

- Act No. 18/2018 Coll. on the protection of personal data and on amendments to certain acts as amended

- Decree No. 158/2018 Coll. of the Office for Personal Data Protection of the Slovak Republic on the procedure for assessing the impact on personal data protection

## 13. USE OF COOKIES

The website [www.barkro.com](http://www.barkro.com) uses cookies that collect and store information during its browsing. Cookies are used for various purposes, e.g., to record the choices made by the user during the browsing of the website or to record user activity during the browsing of the website. They can also be used to remember any information previously entered into forms on the website. Their use can be disabled in most internet browsers. According to GDPR (Recital 30), cookies are defined as online identifiers, which, in combination with unique identifiers and other information obtained from servers, can be used to create profiles of natural persons and identify them, and are therefore considered personal data under GDPR. The controller may use cookies only with the user's consent. The user can withdraw their consent to cookies at any time. Each user can express their consent/disagreement with the use of cookies when visiting the website through a consent management tool (banner,

CMP, bar). If the user does not express consent to the use of cookies, they will not be activated on the website.

**We use the following cookies:**

This table provides details on the types of cookies used by the website www.barkro.com, including their providers, type, validity, and purpose.

Cookie Name	Provider	Type	Validity	Purpose
<b>_greaptcha</b>	Barkro.com	HTML	Permanent	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.
<b>_GRECAPTCHA</b>	google.com	HTML	179 days	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.
<b>ppwp_wp_session</b>	Barkro.com	HTML	1 day	Maintains users' states across page requests.
<b>rc::a</b>	google.com	HTML	Permanent	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.
<b>rc::b</b>	google.com	HTML	Session	This cookie is used to distinguish between humans and bots
<b>rc::c</b>	google.com	HTML	Session	This cookie is used to distinguish between humans and bots.
<b>rc::d-15#</b>	google.com	HTML	Permanent	This cookie is used to distinguish between humans and bots
<b>_ga</b>	barkro.com	HTML	2 years	Registers a unique ID that is used to generate statistical data on how the visitor uses the website
<b>_gat</b>	barkro.com	HTML	1 day	Used by Google Analytics to throttle request rate.

<b>_gid</b>	Barkro.com	HTML	1 day	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.
<b>_hjAbsoluteSessionInProgress</b>	Barkro.com	HTML	1 day	This cookie is used to count how many times a website has been visited by different visitors - this is done by assigning the visitor an ID, so the visitor doesn't get registered twice.
<b>pll_language</b>	barkro.com	HTML	1 year	Used to determine the visitor's preferred language and to set the language accordingly on the website if possible.
<b>_hjFirstSeen</b>	barkro.com	HTML	1 day	This cookie is used to determine if the visitor has visited the website before, or if it is a new visitor on the website.
<b>_hjIncludedInSessionSample</b>	barkro.com	HTML	1 day	Registers data on visitors' website behavior. Used for internal analysis and website optimization.
<b>_hjIncludedInPageviewSample</b>	barkro.com	HTML	1 day	Used to determine if the user's navigation and interactions are included in the website's data analytics and performance metrics.
<b>_hjRecordingLastActivity</b>	barkro.com	HTML	Session	Sets a unique ID for the session. This allows the website to obtain data on visitor behavior for statistical purposes.
<b>_hjSession_#</b>	barkro.com	HTML	1 day	Collects statistics on the visitor's visits to the website, such as the number of visits, average time spent on the

website, and what pages have been read.

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Sets a unique ID for the session. This allows the website to obtain data on visitor behavior for statistical purposes.

Used to track the user's interaction with the Facebook chat widget.

Used by Facebook to deliver a series of advertisement products such as real-time bids from third-party advertisers.

This cookie is used to identify the visitor and optimize ad relevance by collecting visitor data from multiple websites – this exchange of visitor data is usually provided by a third-party data center or ad exchange.

Collects data on visitor behavior from multiple websites to present more relevant advertisement – This also allows the website to limit the number of times that they are shown the same advertisement.

<b>_hjSessionUser_#</b>	barkro.com	HTML	1 year	Collects statistics on the visitor's visits to the website, such as the number of visits, average time spent on the website, and what pages have been read.
<b>hjViewportId</b>	barkro.com	HTML	Session	Sets a unique ID for the session. This allows the website to obtain data on visitor behavior for statistical purposes.
<b>__fb_chat_plugin</b>	barkro.com	HTML	Permanent	Used to track the user's interaction with the Facebook chat widget.
<b>_fbp</b>	barkro.com	HTML	3 months	Used by Facebook to deliver a series of advertisement products such as real-time bids from third-party advertisers.
<b>_hjRecordingEnabled</b>	barkro.com	HTML	Session	This cookie is used to identify the visitor and optimize ad relevance by collecting visitor data from multiple websites – this exchange of visitor data is usually provided by a third-party data center or ad exchange.
<b>common/cavalry_end point.php</b>	facebook.com	HTML	Session	Collects data on visitor behavior from multiple websites to present more relevant advertisement – This also allows the website to limit the number of times that they are shown the same advertisement.

<b>messaging_plugin_ht</b>				Unclassified
<b>tps://barkro.com/_55</b>	facebook.com	HTML	Permanent	
<b>4285854670073</b>				
<b>tr</b>	facebook.com	Pixel	Session	Used by Facebook to deliver a series of advertisement products such as real-time bids from third-party advertisers.

**Necessary Cookies:** These are required for the usability of the website. They help make websites usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

**Statistical Cookies:** These help website owners understand how visitors interact with websites by collecting and reporting information anonymously.

**Marketing Cookies:** These are used to track visitors across websites. The aim is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third-party advertisers.

## 14. CHANGES TO THE PERSONAL DATA PROCESSING RULES

We reserve the right to change the wording of these personal data processing rules, especially in the case of the need to incorporate legislative changes, or changes in the purpose and means of processing. In the event that changes to the personal data processing rules occur that could affect the rights of the data subjects, we will appropriately and sufficiently in advance notify them of such changes.

This document is regularly updated.

Last update: February 9, 2024