# **Privacy Policy**

to the processing of personal data by **International Association of Innovative Teachers and Managers in Education (IAITME)** within the meaning of Art. 13 and Art. 14 ff. of 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 referred to as "the Regulation")

#### 1. Identification of the controller contact details of the controller

The controller is International Association of Innovative Teachers and Managers in Education (IAITME), with registered office at E. Bohúňa 5390/57, 034 01 Ružomberok, Slovakia, ID No.:56431881, registered in MV SR, Reg. No.VVS/1-900/90-70365.

The controller can be contacted at the International Association of Innovative Teachers and Managers in Education (IAITME), at E. Bohúňa 5390/57, 034 01 Ružomberok, Slovakia, by e-mail to the general e-mail address info@iaitme.com or by telephone at + 421 903 412 551.

In matters relating to the processing and protection of personal data, you can contact us by e-mail at info@learnandlead.eu or by telephone at + 421 903 412 551.

#### 2. General information

The Controller proceeds with the processing of your personal data in accordance with the Regulation, Act No. 18/2018 Coll. on the Protection of Personal Data (hereinafter referred to as the "Act") and in accordance with other legal regulations on the protection of personal data.

The Controller obtains personal data directly from you as a data subject (hereinafter also referred to as the "Data Subject") or from any other person who provides us with your personal data. It may be the case that the Data Controller obtains personal data from a person other than you directly, therefore this document provides information to all Data Subjects both within the meaning of Article 13 and Article 14 of the

#### Regulation.

All personal data that the Data Controller processes about you as a Data Subject is processed only for the justified purposes of the processing of personal data, for a limited period of time and with the use of the maximum possible level of security, for which the Data Controller also adopts an internal directive on the processing of personal data, as well as appropriate security measures to protect personal data.

The protection of your personal data is a fundamental priority of the controller, and in this document, as well as in the published Record of Processing Activities (downloadable), you will find information on what personal data we process about you, for what purpose, on what legal basis, to whom we may provide your personal data and, above all, what rights you have in connection with the processing of your personal data, etc. to the processing of personal data by **International Association of Innovative Teachers and Managers in Education (IAITME**, in accordance with Art. 13 and Art. 14 ff. 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 referred to as the "Regulation")

## 3. Purposes of processing personal data

The Controller processes your personal data exclusively in accordance with the principle of lawfulness, namely for the purposes of processing personal data specified in the Record of the Controller's processing activities, if at least one of the following conditions is met at the Controller:

Performance of contractual obligations - The Controller processes personal data in the performance of a contract with the Data Subject, to the extent necessary for the performance of contractual obligations. The processing of personal data in the performance of contractual obligations occurs, for example, when concluding a purchase contract, when concluding a contract relating to the collection and scrapping of vehicles, etc., which is concluded between the Controller and the Data Subject.

Performance of statutory obligations - The Controller also processes

your personal data in the performance of statutory obligations. These legal obligations are, for example, obligations arising from tax regulations, accounting regulations, regulations governing the registration, processing, collection and scrapping of vehicles, etc.

Legitimate interest of the Data Controller - The Data Controller also processes personal data on the basis of a legitimate interest, exclusively in cases where the processing is necessary for the pursuit of the legitimate interests of the Data Controller or a third party, provided that these interests are not overridden by the interests or the fundamental rights and freedoms of the Data Subject. The legitimate interest is applied by the Controller, for example, when monitoring the premises at the Controller's address for the protection of property, monitoring the Controller's premises, etc.

All purposes of the processing of personal data, information on whether the processing of personal data is a contractual or legal requirement, as well as the Controller's legitimate interests can be found in the Record of the Controller's processing activities.

#### **4.Categories of Personal Data**

The Controller shall process the personal data that is necessary for the processing of personal data in accordance with the principle of minimisation so that the Controller can fulfil its contractual and legal obligations or process it on the basis of its legitimate interest. The Controller processes identification data of natural persons - first name, surname, address (permanent, temporary residence), date of birth, ID card number, signature, e-mail address, telephone number, or other necessary data.

Personal data may also include special categories of personal data which the Controller is entitled, and at the same time obliged in some cases, to process. The special categories of personal data that the Controller processes are, for example, data on health, social situation, property conditions, etc.

The categories of personal data processed are listed in the Record of the Controller's processing activities.

## 5. Retention period of personal data

The controller shall retain personal data depending on the purpose of the processing of personal data. For the retention period, the Data Controller shall take into account the principle of minimising the retention of personal data, i.e. it shall process personal data only for the period during which the retention of the personal data is necessary.

The Controller shall store personal data in accordance with the internal directive on documented information management, which includes the Controller's filing plan, which sets out the retention periods of individual groups of personal data in accordance with the applicable legislation.

Where retention periods are not set out in the Operator's record-keeping plan, the Operator shall determine the retention period for personal data, which shall be set out in the Record of Processing Activities.

If you request, we will provide you with the information on the retention period for personal data set out in the Recordkeeping Schedule.

## 6. Rights of Data Subjects

The protection of your personal data as data subjects is governed by the provisions of the Regulation, while the rights of data subjects are regulated by the Regulation, the Act, as well as other data protection legislation. As a Data Subject, you have the following rights:

# Right of access

You have the right to be provided with a copy of the personal data we hold about you, as well as information about how we use your personal data. In most cases, your personal data will be provided to you via electronic means of communication, unless otherwise requested by you.

## Right of redress

We take reasonable steps to ensure that the information we hold about you is accurate, complete and up to date. In the event that the personal information in our possession is inaccurate, incomplete or out of date, we will correct, update, amend or supplement that personal information at your initiative.

#### Right to erasure

In certain circumstances, you have the right to ask us to erase your personal data, for example if the personal data we have collected about you is no longer necessary to fulfil the original purpose of the processing or if you withdraw your consent to the processing of your personal data. However, your right must be assessed in light of all relevant circumstances. For example, we may have certain obligations under applicable law which means that we may not be able to comply with your request.

### Right to restriction of processing

You also have the right to ask us to restrict the processing of your personal data. We will restrict the processing of your personal data if you believe that the personal data we process is incorrect, the processing is unlawful and you request that we restrict the processing, if we do not need your personal data but need it as a Data Subject to assert legal claims, or if you believe that the Data Controller does not have a legitimate reason to process your personal data further.

## Right to data portability

In certain circumstances you have the right to transfer your personal data to another entity of your choice. However, the right of portability only applies to personal data that we process on the basis of a contract to which you are a party, on the basis of consent given by you or where we process personal data by automated means.

# Right to object

You have the right to object to the processing of your personal data, for example, if we process your personal data on the basis of legitimate interest or in the case of processing which involves profiling. If you object to such processing of your personal data, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for such processing.

#### Rights relating to profiling or automated decision-making

Should we process personal data by profiling or automated individual decision-making, you have the right to object to automated individual decision-making, including profiling that results in a legal or similar significant legal consequence for you. However, the controller does not use automated individual decision-making or profiling when processing personal data.

#### Right to lodge a complaint or complaint

You can address your complaint to the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic, with registered office at Hraničná 12, 820 07 Bratislava 27; website: dataprotection.gov.sk, phone number: 02 3231 3214; e-mail: statny.dozor@pdp.gov.sk.

#### 7. Exercise of your rights

You can exercise your rights referred to in the previous point 7. of this information obligation of the Controller:

- in writing, by sending a request or by personal delivery of the request to the address,
- electronically, via the e-mail address:info@iaitme.com
- by telephone, at the telephone number + 421 903 412 551,
- orally, at our registered office at at E. Bohúňa 5390/57, 034 01 Ružomberok, Slovakia, whereby a written record of your request will be made, a copy of which will be provided to you.

We will provide you with a reply within one month of the date on which you exercised your rights. In certain cases, we are entitled to extend the time limit for providing a response in the event of a high number and complexity of requests from Data Subjects, but not more than two months. We will always inform you of the extension of the deadline.

### 8. Transfers to third countries and international organisations

In some cases, the Data Controller transfers personal data to third countries, namely to the United States of America, and these cases are listed in the Record of Processing Activities. The transfer of these personal data may be carried out on the basis of an implementing decision of the European Commission pursuant to Directive 95/46/EC of the European Parliament and of the Council on the adequacy of the

protection afforded by the EU-US Privacy Shield No. 2016/1250, in the case of U.S. companies involved in the so-called EU-U.S. regime. Privacy Shield (the "EU-US Privacy Shield"). The Controller transfers personal data exclusively to companies participating in the EU-US Privacy Shield.

#### 9.Profiling

The controller does not process personal data by automated decision-making, including profiling.

### 10. Recipients

Your personal data may be disclosed to recipients - mainly processors, and also to third parties, Processors include our trainers, or other companies with which we cooperate. These processors are accounting service providers and consultancy and IT companies that manage our website and our internal systems.

The controller only uses processors that have adopted appropriate technical and security measures through which the requirements of the Data Protection Regulations to process your personal data securely are met.

We also disclose your personal data to legally authorized entities, which may include courts, law enforcement authorities, the Labour Inspectorate and other authorities to whom the Controller is obliged to provide personal data.

#### 11. Final Provisions

This notice is valid and effective as of 1st April 2025.