



PERSONAL DATA PROCESSING - PRIVACY NOTICE

Controller	Kia Slovakia s. r. o. Sv. Jána Nepomuckého 1282/1, 013 01 Teplička nad Váhom, Slovak Republic Business ID No: 35 876 832 Company registered with the Business Register of the District Court Žilina, Section Sro, Insert No: 15074/L
Web	https://www.kia.sk/en/personal-data-protection
Data protection officer	Employee of the Compliance and Internal Audit section (Compliance), who can be contacted in person at the address of the Kia (Administrative building, 2nd floor), by sending an e-mail to podnet@kia.sk or by phone at 00421 41 515 5555.

Legal regulations in the field of personal data protection

- 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 (hereinafter referred to only as "GDPR")
- Act no. 18/2018 Coll. on the Protection of Personal Data and on amendment of certain acts (hereinafter referred to only as "Act")

Purposes, legal bases of processing and retention period of personal data

Kia processes personal data (obtained directly from the data subjects or through intermediaries, from publicly available sources or from third parties) in accordance with pre-defined processing intentions linked to various operations within each individual processes. Each purpose has an adequate legal basis to guarantee the lawfulness of the processing. Different types of legal bases are applied for Kia processing operations, depending on their suitability for the purpose, but it is in particular compliance with a legal obligation (the retention period is determined by law and the person concerned is obliged to provide personal data in this case), existence of Kia's legitimate interests (retention period is determined by the duration of legitimate interests and by the period during which claims of legitimate interest can be asserted), data subject's consent (the retention period is determined by the time for which the consent was granted, or it is terminated by the moment of withdrawal of the consent), fulfilment of the contract to which the data subject is a party or fulfilment of the contract in the framework of pre-contractual relations (retention period is determined by the



time of pre-contractual negotiations and the period of the contract performance), including the period during which claims under the contract may be asserted; the provision of personal data may be voluntary in this case, except where the provision of data is necessary for the contract fulfilment.

Personal data processed by Kia:

<p>Kia employees</p>	<ul style="list-style-type: none"> - Name, surname, academic title, address, private e-mail address, private phone number, - Employee ID number, photo, company e-mail address, company phone number, job position, organizational unit, - Information about education, trainings and development, - Personal data included in employment contract or in agreements of work performed outside employment relationship, or in other agreements related to the individual employment relationship, - Personal data related to work ability (professional, health), - Personal data collected through CVs and job applications, - Performance and competency evaluation data and work discipline, - Personal data of spouses and children for tax bonus & benefits, - Information about remuneration, salary data, bank account number and employee benefits, - Time management data, - Security information - to the extent of security camera footage, control mechanisms.
<p>Data subjects participating in Kia business or other contractual relationships</p>	<ul style="list-style-type: none"> - Name, surname, academic title, company e-mail address, company phone number, job position, organizational unit, - Personal data verifying the identity of persons entering Kia (name, surname, birthdate, address, ID number or passport number, - Security information - to the extent of security camera footage.
<p>Other data subjects</p>	<ul style="list-style-type: none"> - Personal data of persons submitting random inquires including data to the extent of these inquires, - Security information - to the extent of security camera footage (visit), - VIN, CO2 emission data, average fuel and/or energy consumption data.



Recipients of the personal data

Kia makes personal data available in particular:

- a) Public authorities (state administration and self-government bodies, law enforcement bodies and courts, notarial and executory offices, or other public law entities and institutions),
- b) Social insurance and health insurance companies, supplementary pension savings and pension management companies, postal companies, banks and insurance companies,
- c) Kia contract partners (suppliers of goods and services, intermediaries processing personal data on behalf of Kia or contractual partners, those on whose behalf Kia processes personal data,
- d) Kia Slovakia Foundation,
- e) Employee representatives,
- f) Medias and news agencies,
- g) Other authorities, non-legal or legal persons, within the framework defined by the relevant legal basis.

Transfer of personal data to third countries

Kia does not transfer any personal data of the data subject to third countries outside the European Union. If there are valid reasons for such a transfer of personal data, Kia will do so solely on the basis of the conditions set out in GDPR

legal framework or the Act.

Automated decision making and profiling

Kia does not make decisions based on the automated processing of personal data, including profiling.

Technical and organizational security measures

To ensure the protection of personal data, Kia has taken appropriate technical and organizational measures, in particular in the areas of physical, operational and information security. The measures are defined in Kia's internal regulations.



Rights of the data subjects

Right of access

The data subject has the right to be informed whether the personal data concerning him/ her are being processed and, if so, he/she has the right to access his/her personal data. The data subject has the right to be provided with copies of the personal data that Kia processes about him/ her as well as with information on how personal data is processed. Kia provides these information in a form that reflects the form of the data subject request or required method of provision. Kia is entitled to charge a reasonable fee corresponding to the administrative costs in case of repeated requests from data subject if he/she repeatedly requests personal data to the same extent.

Right to rectification

Kia is only entitled to process correct and up-to-date personal data, so it is in its interest for the data subject to report of processing of incomplete, incorrect or inaccurate data and to request a correction. Based on the right to correct the processed personal data, Kia will complete or correct incorrect personal data without undue delay.

Right to erasure

The data subject has the right to demand deleting of all data that are being processed illegally (e.g. the data subject has withdrawn his consent to the data processing and there is no other legal basis of processing).

Right to restriction of processing

The data subject has the right to restrict data processing if the right of rectification has been applied or if he/she objects to the personal data erasure, if their processing is illegal or Kia no longer needs these personal data for processing but the data subject needs the data to prove, assert or defend legal claims. In such cases, Kia will limit the processing of personal data to the time strictly necessary.



Right to data portability

The data subject has the right to obtain and request Kia to transfer personal data provided by him/her to another controller in a structured, commonly used and readable format, but only in the case of data processed on a legal basis, with the consent of the data subject or on the basis of a contract to which the data subject is a party.

Right to object

The data subject is entitled to object personal data processing if he/she considers that it is unjustified or he/she requires to reconsider profiling or result of automated decision-making. Kia may not further process personal data unless it proves the necessary legitimate interests for data processing which outweigh the interests, rights and freedoms of the data subject, or the reasons for proving, asserting or defending legal claims.

Right to withdraw consent

In case of data processing based on the data subject's consent, data subject has the right to revoke the consent at any time by sending it to e-mail podnet@kia.sk or in person at Kia's registered office, Compliance and internal audit section. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Right to file a complaint

The data subject may enforce his/her rights and address to Kia any comments or complaints regarding the processing of his/her personal data, by sending an e-mail to podnet@kia.sk or in writing at the address of Kia's registered seat or in person at the Kia's registered office, while he/her also has the right to file a complaint with the Office for Personal Data Protection of the Slovak Republic, with its registered office at Hraničná 12, 820 07 Bratislava 27, which is the supervisory authority.



Information on purposes, legal bases of the data processing and personal data and data subjects categories

Agenda	Purpose	Legal basis	Personal data category	Data subjects category	Retention period
Personnel agenda	Maintaining employee records in personal file	Compliance with a legal obligation to which Kia is subject Art. 9 sec. 2 lit. b), f), h), i) GDPR	Regular personal data to the extent of personal file Sensitive personal data (health data, trade union board membership) Personal data relating to criminal convictions and offences	Kia employees, family relatives and close persons of Kia employees, persons with agreements of work performed outside employment relationship, Kia students and pupils	70 y.
	Maintaining records related to employment relationship and agreements of work performed outside employment relationship	Processing is necessary for the performance of contract or to take steps prior to entering into contract Art. 9 sec. 2 lit. b), f), h), i) GDPR	Regular personal data Sensitive personal data (health data)	Kia employees, family relatives and close persons of Kia employees, persons with agreements of work performed outside employment relationship, Kia students and pupils	70 y.
	Administration of recruitment process (specific vacant position offer - jobs and vocational education and trainings and scholarship program)	Processing is necessary for the performance of contract or to take steps prior to entering into contract	Regular personal data	Job applicants, Kia employees, Kia students and pupils	70 y.
	Administration of candidate database	Data subject has given consent to the processing	Regular personal data	Job applicants	1 y.
	Candidate / Kia internal employee evaluation	Processing is necessary for the purposes of legitimate interests pursued by Kia (to hire the right candidate fulfilling requirements pursued by Kia)	Regular personal data	Job applicants, Kia employees, Kia students and pupils	70 y.



Agenda	Purpose	Legal basis	Personal data category	Data subjects category	Retention period
Personnel agenda	Processing the employees` contact personal data to communicate essential information related to the employment relationship and for the purposes of effective HR management	Processing is necessary for the purposes of legitimate interests pursued by Kia (effective communication of the information related to the fulfillment of work and for the purposes of HR management)	Regular personal data	Kia employees, persons with agreements of work performed outside employment relationship, Kia students and pupils	Duration of employment relationship/other contractual relationship based on the agreement
Payroll agenda	Administration of payroll agenda (salary data, payslip, deductions and executions) related to Kia employees and leasing employees, based on employment contracts or other agreements of work performed outside employment relationship including salary acknowledgment receipts and administration of annual tax reconciliation	Compliance with a legal obligation to which Kia is subject Art. 9 sec. 2 lit. b), f) GDPR	Regular personal data Sensitive personal data (health data)	Kia employees, family relatives and close persons of Kia employees, persons with agreements of work performed outside employment relationship, former Kia employees, Kia students and pupils	50 y.
	Fulfilling Kia obligations towards social insurance agency	Compliance with a legal obligation to which Kia is subject	Regular personal data	Kia employees, family relatives and close persons of Kia employees, persons with agreements of work performed outside employment relationship, former Kia employees Kia students and pupils	10 y.
	Fulfilling Kia obligations towards health insurance companies	Compliance with a legal obligation to which Kia is subject	Regular personal data	Kia employees, family relatives and close persons of Kia employees, persons with agreements of work performed outside employment relationship, former Kia employees Kia students and pupils	10 y.



Agenda	Purpose	Legal basis	Personal data category	Data subjects category	Retention period
Foreign employees	Fulfilling Kia obligations related to the employment of foreigners- third-country citizens	Compliance with a legal obligation to which Kia is subject Art. 9 sec. 2 lit. b), f), h), i) GDPR	Regular personal data Sensitive personal data (health data, nationality) Personal data relating to criminal convictions and offences	Foreign employees, family relatives of foreign employees	20 y.
	Providing coordination support to Kia employees and their family relatives - third-country citizens (i.e. accommodation services, schools, fulfilling obligations under Slovak legislation)	Processing is necessary for the performance of contract or to take steps prior to entering into contract Data subject has given consent to the processing (family relatives)	Regular personal data	Foreign employees, family relatives of foreign employees	Duration of employment relationship/other contractual relationship based on the agreement
Occupational health and safety	Administration of the occupational health and safety agenda (records of work injuries, imminent danger, trainings, health at work service, informative breath alcohol test, breach of work discipline etc.)	Compliance with a legal obligation to which Kia is subject Art. 9 sec. 2 lit. b), f), h), i) GDPR	Regular personal data. Sensitive personal data (health data)	Kia employees, former Kia employees, Kia students and pupils, other persons working at Kia premises	20 y.
	Administration of prevention of work injuries and imminent danger	Processing is necessary for the purposes of legitimate interests pursued by Kia (to secure safe working conditions of Kia employees and for other persons)	Regular personal data	Kia employees, former Kia employees, Kia students and pupils, other persons working at Kia premises	10 y.



Agenda	Purpose	Legal basis	Personal data category	Data subjects category	Retention period
Business trips	Administration of business trips including documents and data related to compensation	Compliance with a legal obligation to which Kia is subject	Regular personal data	Kia employees, former Kia employees	3 y.
	Business trips organization including accommodation and transportation reservation	Processing is necessary for the purposes of legitimate interests pursued by Kia (effective organization and management of business trips; ensuring protection of health and safety of Kia employees and other persons participating on Kia business trips)	Regular personal data	Kia employees, Kia business travelers, former Kia employees	3 y.
Collective employment relationship	Utilizing collective employment relationships including the administration	Compliance with a legal obligation to which Kia is subject Art. 9 sec. 2 lit. b), f), h), i) GDPR	Regular personal data to the extent of personal file Sensitive personal data (health data, trade union membership)	Kia employees acting on behalf of trade union organization, Kia employees - subjects of negotiations & consultations with trade union organization, former Kia employees	10 y.
Kia social policy	Utilizing Kia social policy including the administration of records related to social fund contributions and employee benefits	Compliance with a legal obligation to which Kia is subject Processing is necessary for the performance of contract or to take steps prior to entering into contract	Regular personal data	Kia employees, family relatives and close persons of Kia employees, former Kia employees	50 y.
Employees education & development	Securing trainings, courses and certificates required under respective legislation	Compliance with a legal obligation to which Kia is subject	Regular personal data	Kia employees, former Kia employees, Kia students and pupils	10 y.



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Employees education & development	Analyzing education & development requirements of Kia employees and planning respective development	Processing is necessary for the purposes of legitimate interests pursued by Kia (securing education and development requirements of Kia employees)	Regular personal data	Kia employees	10 y.
	Dual education program including administration of relevant documentation	Compliance with a legal obligation to which Kia is subject	Regular personal data	Kia students and pupils, parental authority, vocational training supervisors	10 r.
	Supporting students working on diploma thesis, vocational education and scholarship program	Processing is necessary for the performance of contract or to take steps prior to entering into contract	Regular personal data	Kia students and pupils	10 y.
Contractual agreements, accounting, litigation and dispute management	Data processing related to contractual and pre-contractual relationships	<p>Processing is necessary for the performance of contract or to take steps prior to entering into contract (business partner is natural person)</p> <p>Legitimate interest pursued by Kia to manage contracts (concluding and performing contracts and protecting its own rights and legitimate interests and property under its ownership)s</p>	Regular personal data	Kia employees and other persons connected to Kia business partners, employees and other persons connected to Kia business partners with which Kia intends to enter into contractual relationship	10 y. after the contractual relationship ceases to exist



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Contractual agreements, accounting, litigation and dispute management	Administration of accounting documents	Compliance with a legal obligation to which Kia is subject	Regular personal data	Kia employees, personal data included in the invoices or other accounting bills	10 y.
	Litigation and dispute management	Processing is necessary for the purposes of legitimate interests pursued by Kia Art. 9 sec. 2 lit. f) GDPR	Regular personal data to the extent of personal file Sensitive personal data Personal data relating to criminal convictions and offences	Data subjects in a legal dispute or in the other proceeding against Kia (or persons on behalf of whom is Kia in a legal dispute or in the other proceeding against some other party)	10 y. after the dispute resolution
	Administration of inquiries and requests to provide cooperation	Compliance with a legal obligation to which Kia is subject Art. 9 sec. 2 lit. f) GDPR	Regular personal data to the extent of personal file Sensitive personal data	Persons in the employment, business or other contractual relationship with Kia	5 y.
Security	Administration of control and registration of persons (including database of the breaches of internal Kia procedures or damages) entering Kia premises in order to maintain security	Processing is necessary for the purposes of legitimate interests pursued by Kia (ensuring protection of health and safety, security and property and protection of rights and legitimate interests pursued by Kia and by persons entering Kia premises; revealing and preventing criminality and other anti-social activity)	Regular personal data Sensitive personal data	Persons entering Kia premises	10 y.



Agenda	Purpose	Legal basis	Personal data category	Data subjects category	Retention period
Security	Ensuring camera system monitoring to improve protection of Kia property; increasing health safety and security; gathering proof evidence for potential legal proceedings and to control obedience of work discipline of Kia employees	Processing is necessary for the purposes of legitimate interests pursued by Kia (ensuring protection of property and protection of rights and legitimate interests pursued by Kia and by other persons; ensuring protection of health and safety and security of persons entering Kia premises; revealing and preventing criminality and other anti-social activity)	Regular personal data	Persons entering Kia premises	14 days
	Ensuring security of IT systems and internal Kia infrastructure (including database of security incidents)	Processing is necessary for the purposes of legitimate interests pursued by Kia (ensuring protection of property and protection of rights and legitimate interests pursued by Kia and by other persons; ensuring operation of IT systems, infrastructure and applications and their breach security)	Regular personal data	Kia employees, other persons who have access to Kia IT network	10 y.
	Performing audit activities (including audit findings database)	Processing is necessary for the purposes of legitimate interests pursued by Kia (optimizing processes, securing effective and profitable business operation; ensuring fulfilment of legal obligations, contractual obligations and other obligations under international standards and Kia internal procedures; compliance with business ethics and Kia core values)	Regular personal data	Kia employees, persons in the business or other contractual relationship with Kia	10 y.



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Security	Providing unique access key to Kia Wi-Fi network	Processing is necessary for the performance of contract or to take steps prior to entering into contract	Regular personal data	Kia employees Persons in the business or other contractual relationship with Kia	Duration of contractual relationship
PR agenda	Measuring and analyzing Kia website traffic (cookies)	Data subject has given consent to the processing	Regular personal data	Kia website visitors	10 y.
	Producing and publishing visual, audio and audio-visual recordings and other materials for Kia presentation purpose in internal and external media	Data subject has given consent to the processing	Regular personal data (photos, podcasts, videos, articles and news)	Kia employees, persons in the business or other contractual relationship with Kia	5 y.
General agenda	Organization of internal events and competitions	Processing is necessary for the performance of contract or to take steps prior to entering into contract Art. 9 sec. 2 lit. a) GDPR	Regular personal data Sensitive personal data (health data)	Kia employees, family relatives of Kia employees, other data subjects applying for internal event or participating in competition	Duration of contractual relationship
	Administration of corporate agenda	Compliance with a legal obligation to which Kia is subject Art. 9 sec. 2 lit. f) GDPR	Regular ssspersonal data Sensitive personal data Personal data relating to criminal convictions and offences	Executives, other Kia representatives, Kia employees, former Kia employees,	20 y.



Agenda	Purpose	Legal basis	Personal data category	Data subjects category	Retention period
General agenda	Internal processes management (technical, organization and production) and reporting	Processing is necessary for the purposes of legitimate interests pursued by Kia (ensuring effective operation of internal processes and protection of property and of rights and legitimate interests pursued by Kia or by other persons)	Regular personal data	Kia employees, other persons participating in the internal Kia processes	10 y.
	Kia internal fleet management	Processing is necessary for the performance of contract or to take steps prior to entering into contract	Regular personal data.	Kia employees, persons in the business or other contractual relationship with Kia	10 y. after the contractual relationship ceases to exist
	Monitoring and reporting data related to CO ₂ emissions	Compliance with a legal obligation to which Kia is subject	Regular personal data	Owners of vehicles manufactured by Kia	Time period specified by respective legislation
	Administration of registry	Compliance with a legal obligation to which Kia is subject Art. 9 sec. 2 lit. f), j) GDPR	Regular personal data Sensitive personal data	Personal data of persons included in archival documents and records, requestors to access to archival documents and record	Time period specified by respective legislation



Agenda	Purpose	Legal basis	Personal data category	Data subjects category	Retention period
General agenda	Compliance and whistleblowing	<p>Compliance with a legal obligation to which Kia is subject</p> <p>Processing is necessary for the purposes of legitimate interests pursued by Kia (optimizing processes, securing effective and profitable business operation; ensuring fulfilment of legal obligations, contractual obligations and other obligations under international standards and Kia internal procedures; compliance with business ethics and Kia core values)</p> <p>Art. 9 sec. 2 lit. f) GDPR</p>	<p>Regular personal data</p> <p>Sensitive personal data</p>	Personal data of whistleblowers or other persons included in report related to anti-social activities	<p>Time period specified by respective legislation</p> <p>10 y.</p>
	Administration of inquiries addressed to Kia	<p>Processing is necessary for the purposes of legitimate interests pursued by Kia (to administrate any relevant inquiry received by Kia; ensuring protection of property and protection of rights and legitimate interests pursued by Kia and by other persons)</p>	<p>Regular personal data</p> <p>Sensitive personal data</p>	Persons submitting inquires or other persons included in inquiries	5 y.
	Data subjects rights application	<p>Compliance with a legal obligation to which Kia is subject</p> <p>Processing is necessary for the purposes of legitimate interests pursued by Kia (administration of data subject inquires to ensure their rights and legitimate interests)</p> <p>Art. 9 sec. 2 lit. f) GDPR</p>	<p>Regular personal data</p> <p>Sensitive personal data</p>	Data subjects applying their rights	10 y.