

PRIVACY POLICY

for arranging the purchase of a Slovak electronic motorway vignette

1. Introduction

- 1.1. This Privacy Policy (hereinafter also referred to as the "Privacy Policy") describes the manner in which the operator of the website www.tollpay.sk processes customers' personal data when providing services related to the sale of electronic motorway vignettes through the website.
- 1.2. The Controller processes personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the "GDPR") and Act No. 18/2018 Coll. on Personal Data Protection (hereinafter referred to as the "Personal Data Protection Act"). The security of personal data and its lawful processing are our priority. Below you will find information on how we process your personal data and how we ensure its security.
- 1.3. The Customer is obliged to read the Privacy Policy before submitting an order and expressly confirms their consent to the Privacy Policy before submitting the order.

2. Controller's Details

Business name: Toll Pay s. r. o.

Registered office: Kostolná 933/16, 013 01 Teplička nad Váhom, Slovak Republic

Company ID No.: 36441350

Tax ID No.: 2022164364

VAT ID No.: SK2022164364

Registration in the Commercial Register of the Slovak Republic: Commercial Register of the District Court Žilina, Section: Sro, File No. 17331/L

Email: info@tollpay.sk

(hereinafter referred to as the "Controller")

3. Rozsah spracúvania osobných údajov a právny základ spracúvania

- 3.1. Prevádzkovateľ spracúva len také osobné údaje, ktoré nevyhnutne potrebuje na dosiahnutie stanoveného účelu. Prevádzkovateľ spracúva osobné údaje na nasledovný účel:

A) Vedenie účtovníctva

Na účely vedenia účtovníctva a plnenia povinností vyplývajúcich z príslušných právnych predpisov spracúva Prevádzkovateľ osobné údaje zákazníkov a ďalších osôb uvedených v účtovných dokladoch v rozsahu meno, priezvisko, fakturačná adresa, údaje o platbách, evidenčné číslo vozidla (EČV), krajinu registrácie vozidla, kontaktný email a/alebo telefónne číslo.

Právnym základom spracúvania je splnenie zákonných povinností Prevádzkovateľa podľa príslušných právnych predpisov upravujúcich požiadavky na účtovníctvo a daňovú evidenciu. Účtovné doklady a súvisiace osobné údaje Prevádzkovateľ na tento účel uchováva po dobu 10 rokov.

B) Poskytovanie služieb

Na účely zabezpečenia kúpy diaľničnej známky spracúva Prevádzkovateľ osobné údaje zákazníkov v rozsahu meno, priezvisko, fakturačná adresa, údaje o platbách, evidenčné číslo vozidla (EČV), krajina registrácie vozidla, kontaktný email a/alebo telefónne číslo, druh a doba platnosti diaľničnej známky vrátane začiatku a konca jej platnosti. Uvedené údaje Prevádzkovateľ spracúva na nasledovné účely:

- Prijatie objednávky
- Spracovanie a vybavenie objednávky
- Uzatvorenie a plnenie zmluvy
- Zakúpenie diaľničnej známky pre vozidlo zákazníka u správcu výberu úhrad diaľničnej známky v zmysle platných právnych predpisoch (Národná diaľničná spoločnosť, a.s.)
- zaslania potvrdenia o zabezpečení diaľničnej známky,
- evidencie objednávok, uzatvorených a vybavených zmlúv a súvisiacej dokumentácie.

Právnym základom spracúvania je plnenie zmluvy uzatvorenej medzi Prevádzkovateľom a zákazníkom pričom príslušné doklady a súvisiace osobné údaje Prevádzkovateľ na tento účel uchováva po dobu 10 rokov.

C) Reklamácie a sťažnosti

V prípade uplatnenia reklamácie spracúva Prevádzkovateľ osobné údaje zákazníka v rozsahu meno, priezvisko, adresa, e-mailová adresa, údaje o objednávke, údaje o reklamovanej službe a informácie týkajúce sa predmetu reklamácie/sťažnosti.

Účelom spracúvania je prijatie, vybavenie a evidencia reklamácií/sťažností, ako aj plnenie povinností vyplývajúcich z právnych predpisov na ochranu spotrebiteľa. Právnym základom spracúvania je splnenie zákonnej povinnosti prevádzkovateľa pričom príslušné doklady a súvisiace osobné údaje súvisiace s reklamáciou uchováva Prevádzkovateľ po dobu 5 rokov odo dňa jej vybavenia.

D) Cookies

Prevádzkovateľ na svojej webovej stránke používa súbory cookies na účely zabezpečenia jej správneho fungovania, zlepšenia používateľského komfortu a v prípade udelenia súhlasu aj na analytické a marketingové účely. Súbory cookies, ktoré nie sú nevyhnutné na prevádzku webovej stránky, spracúva Prevádzkovateľ na základe súhlasu návštevníka webu udeleného

prostredníctvom cookies lišty. Udelený súhlas môže návštevník kedykoľvek odvolať alebo zmeniť prostredníctvom nastavení cookies alebo nastavení svojho internetového prehliadača. Údaje získané prostredníctvom cookies Prevádzkovateľ uchováva najviac 14 mesiacov, prípadne po dobu stanovenú pre konkrétny typ cookies. Podrobnejšie informácie o používaných cookies, ich účele, dobe uchovávaní a možnostiach správy sú uvedené v samostatnej kapitole.

3. Scope of Personal Data Processing and Legal Basis for Processing

3.1. The Controller processes only such personal data as is strictly necessary to achieve the specified purpose. The Controller processes personal data for the following purposes:

A) Accounting

For the purposes of bookkeeping and fulfilling obligations arising from applicable legal regulations, the Controller processes the personal data of customers and other persons listed in accounting documents, to the extent of first name, surname, billing address, payment details, vehicle registration number/license plate number, country of vehicle registration, contact email and/or telephone number.

The legal basis for processing is the fulfilment of the Controller's statutory obligations under the applicable legal regulations governing accounting and tax record-keeping requirements. For this purpose, the Controller retains accounting documents and related personal data for a period of 10 years.

B) Provision of Services

For the purposes of arranging the purchase of a motorway vignette, the Controller processes customers' personal data to the extent of first name, surname, billing address, payment details, vehicle registration number/license plate number, country of vehicle registration, contact email and/or telephone number, type and validity period of the motorway vignette, including the start and end date of its validity. The Controller processes the above data for the following purposes:

- accepting the order;
- processing and completing the order;
- concluding and performing the contract;
- purchasing a motorway vignette for the customer's vehicle from the administrator responsible for collecting motorway vignette payments under applicable legal regulations, namely Národná diaľničná spoločnosť, a.s.;
- sending confirmation that the motorway vignette has been arranged;

- keeping records of orders, concluded and completed contracts, and related documentation.

The legal basis for processing is the performance of the contract concluded between the Controller and the customer. For this purpose, the Controller retains the relevant documents and related personal data for a period of 10 years.

C) Claims and Complaints

If a claim is submitted, the Controller processes the customer's personal data to the extent of first name, surname, address, email address, order details, details of the service complained of, and information relating to the subject matter of the claim/complaint.

The purpose of processing is the receipt, handling, and recording of claims/complaints, as well as the fulfilment of obligations arising from consumer protection legislation. The legal basis for processing is the fulfilment of the Controller's statutory obligation. The Controller retains the relevant documents and related personal data concerning the claim for a period of 5 years from the date on which it is resolved.

D) Cookies

The Controller uses cookies on its website for the purposes of ensuring the proper functioning of the website, improving user comfort, and, where consent has been granted, also for analytical and marketing purposes. Cookies that are not strictly necessary for the operation of the website are processed by the Controller on the basis of the website visitor's consent granted through the cookie banner.

The visitor may withdraw or change their consent at any time through the cookie settings or the settings of their internet browser. Data obtained through cookies are retained by the Controller for a maximum of 14 months, or for the period specified for the particular type of cookie. More detailed information about the cookies used, their purpose, retention period, and management options is provided in a separate chapter.

4. Disclosure of Personal Data to Third Parties

- 4.1. The Controller discloses customers' personal data to third parties only in cases where such an obligation is imposed by generally binding legal regulations or where such disclosure is necessary for the conclusion and performance of a contract with the customer.
- 4.2. For the purpose of arranging the purchase of a motorway vignette, the Controller discloses the necessary personal data for the purpose of securing payment for the motorway vignette through the website www.eznamka.sk to the relevant administrator responsible for collecting motorway vignette payments, namely

Národná diaľničná spoločnosť, a.s., with its registered office at Dúbravská cesta 14, 841 04 Bratislava, Slovak Republic, Company ID No.: 35 919 001, registered in the Commercial Register of the Municipal Court Bratislava III, Section: Sa, File No. 3518/B. The information obligation concerning the processing of personal data in connection with motorway vignette payment at www.eznamka.sk is available at: <https://eznamka.sk/sk/zakaznicke-sluzby/informacna-povinnost>.

- 4.3. In order to ensure its activities, the Controller also uses processors who process personal data on its behalf and solely on the basis of its instructions. The Controller has concluded a personal data processing agreement with each processor in accordance with applicable legal regulations.
- 4.4. The Controller may entrust the processing of personal data in particular to:
 - an accounting service provider;
 - an invoicing system provider;
 - a payment gateway provider;
 - a hosting provider and website administrator;
 - a cookie service provider, Cookiebot by Usercentrics.
- 4.5. To the extent necessary, the Controller may also disclose personal data to other contractual partners where this is required for the performance of the contract or for ensuring the provision of services, for example to entities providing technical support, environment administration, or marketing services.

5. Transfer of Personal Data Outside the EU

- 5.1. The Controller does not transfer personal data outside the European Union, except in the cases expressly stated herein.
- 5.2. In order to remember information about visits and to improve the functioning of the website, the Controller uses the Cookiebot by Usercentrics service. Personal data are generally processed on servers located within the European Union. However, in certain cases, in connection with the use of their technical infrastructure or subcontractors, a limited scope of data may be transferred outside the European Economic Area. Such transfers are carried out in accordance with the requirements of the GDPR and using appropriate safeguards established by the service provider.

6. Method of Personal Data Processing

- 6.1. The Controller processes personal data primarily in electronic form, while in justified cases personal data may also be processed in paper form. No automated individual decision-making or profiling is used in the processing of personal data that would have legal effects or a similarly significant impact on data subjects.
- 6.2. The Controller keeps records of processing activities and adopts appropriate technical, organisational, and personnel measures to ensure the protection of

personal data against unauthorised access, loss, misuse, damage, or destruction. These measures include, in particular, the use of security mechanisms to protect information systems, a strong password policy, encryption, regular system updates, and data backups.

- 6.3. Personal data are made available only to authorised persons who need them for the performance of their employment or contractual duties. Such persons are duly instructed on their duty of confidentiality and are bound by the obligation to protect the confidentiality of the processed data.
- 6.4. When selecting processors, the Controller proceeds with due professional care and cooperates only with entities that provide sufficient guarantees of having adopted appropriate technical and organisational measures to ensure the protection of personal data in accordance with applicable legal regulations.

7. Rights of Data Subjects

- 7.1. Every natural person whose personal data are processed, i.e. the data subject, is granted statutory rights under applicable legislation, namely:

A) Right of Access to Data

The data subject has the right to obtain confirmation from the Controller as to whether the Controller processes their personal data, as well as the right to obtain access to such personal data. The Controller shall provide one copy of the personal data being processed in written paper form free of charge. For any additional copies in written paper form requested by the data subject, the Controller may charge a reasonable fee corresponding to administrative costs. Where the data subject has submitted the request by electronic means, the information shall be provided in a commonly used electronic form, unless the data subject has requested another method.

B) Right to Rectification

The data subject has the right to have the Controller rectify inaccurate personal data concerning them without undue delay. Taking into account the purposes of the processing, the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

C) Right to Erasure — “Right to Be Forgotten”

The data subject has the right to have the Controller erase personal data concerning them without undue delay, provided that at least one of the following conditions is met:

- 1) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- 2) the data subject withdraws the consent on which the processing is based, and there is no other legal basis for the processing;

- 3) the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- 4) the personal data have been unlawfully processed;
- 5) erasure is necessary for compliance with an obligation under applicable legal regulations, special regulations, or an international treaty by which the Slovak Republic is bound;
- 6) the personal data were collected in connection with the offer of information society services addressed directly to a child over the age of 16 who gave consent, or to a younger child where consent was given or approved by the holder of parental rights and responsibilities.

D) Right to Restriction of Processing

The data subject has the right to have the Controller restrict processing in any of the following cases:

- 1) the data subject contests the accuracy of the personal data, for a period enabling the Controller to verify the accuracy of the personal data;
- 2) the processing is unlawful and the data subject objects to the erasure of the personal data and requests the restriction of their use instead;
- 3) the Controller no longer needs the personal data for the purposes of processing, but the data subject needs them for the establishment, exercise, or defence of legal claims;
- 4) the data subject has objected to the processing, pending verification of whether the legitimate grounds of the Controller override the legitimate grounds of the data subject.

E) Right to Data Portability

The data subject has the right to receive the personal data concerning them which they have provided to the Controller in a structured, commonly used, and machine-readable format, and has the right to transmit those data, where technically feasible, to another controller without hindrance from the Controller, where:

- 1) the processing is based on the data subject's consent or on a contract;
- 2) the processing is carried out by automated means.

F) Right to Object to Automated Individual Decision-Making, Including Profiling

The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

G) Right to Withdraw Consent

The data subject has the right to withdraw consent to the processing of personal data concerning them at any time, in the same manner in which the consent was

granted. Withdrawal of consent shall not affect the lawfulness of personal data processing based on consent before its withdrawal.

H) Right to Submit a Petition to Initiate Personal Data Protection Proceedings

A data subject who believes that their personal data are being processed without a legal basis or unlawfully may submit a petition to initiate proceedings to the Office for Personal Data Protection of the Slovak Republic:

- 1) in paper form at the following address:
Office for Personal Data Protection of the Slovak Republic
Galvaniho Business Centrum II
Galvaniho 7/B
821 04 Bratislava
Telephone: +421 2 32 31 32 14 / +421 2 32 31 32 49
Email: statny.dozor@pdp.gov.sk
- 2) electronically in accordance with Section 19(1) of Act No. 71/1967 Coll. on Administrative Proceedings, the Administrative Procedure Code.

8. Cookies

- 8.1. Cookies are small text files that are stored on your device (computer, tablet, or mobile phone) through an internet browser when you visit a website. They contain information necessary to ensure the proper functioning of the website, remember your settings, or improve the user experience. When you revisit the website, the internet browser may reload these files and send them back to the website, enabling the website to recognise your device or restore previous settings. The use of necessary cookies is required for the proper functioning of the website. Other types of cookies, in particular analytical and marketing cookies, are stored and processed only on the basis of your consent granted through the cookie banner or cookie settings centre. You may withdraw or change your consent at any time in the cookie settings or through the settings of your internet browser.
- 8.2. The Controller uses cookies on the website www.tollpay.sk in order to ensure its proper functioning, improve user comfort, and analyse traffic. Some cookies are necessary for the basic operation of the website, while others are used only on the basis of your consent.
- 8.3. The Controller uses cookies for the following purposes:
 - a) ensuring the proper functioning and security of the website;
 - b) improving the quality of the services provided and optimising the website content;
 - c) recognising the user upon their repeated visit and remembering their preferences;

- d) collecting, analysing, and evaluating statistical data on the use of the website and visitor behaviour;
- e) adapting content and displayed information to users' preferences and interests;
- f) displaying relevant service recommendations or offers based on the user's preferences;
- g) carrying out marketing activities, including remarketing, where the user has granted consent to their use.

8.4. In terms of purpose, the Controller uses the following categories of cookies on the website www.tollpay.sk:

- a) Necessary cookies, which are required to ensure the proper functioning of the website and the provision of its basic functions. They enable, for example, the remembering of the user session, order processing, or maintaining website security. Without these cookies, the website cannot be properly used, and therefore they cannot be disabled.
- b) Preference cookies, which are used to remember the user's settings, such as language, region, or website appearance, and to adapt the functioning of the website accordingly based on previous interactions. Their purpose is to increase comfort when using our services and to provide a more personalised user experience.
- c) Analytical cookies, which are used to obtain statistical information about the use of the website, such as the number of visits, pages visited, time spent in individual sections, or the way users navigate the website. The data obtained help the Controller improve the content, functionality, and user comfort.
- d) Marketing cookies, which are used to display relevant content and advertising based on the visitor's interests, preferences, and online behaviour. They may also be used to measure the effectiveness of advertising campaigns and for remarketing.

8.5. We use preference, analytical, and marketing cookies exclusively on the basis of your prior consent, which you may withdraw or modify at any time through the cookie settings or the settings of your internet browser, for example here:

Firefox:

<https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>

Safari:

<https://support.apple.com/cs-cz/guide/safari/sfri11471/mac>

Chrome:

<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=cs>

Internet Explorer:

<https://support.microsoft.com/cs-cz/help/17442/windows-internet-explorer-delete-manage-cookies>

- 8.6. The Controller's website www.tollpay.sk may contain links to third-party websites or services, or may use content and tools provided by external entities, such as social networks or analytical and marketing platforms. As a result, when visiting the Controller's website, cookies managed by such third parties may also be stored. The Controller has no control over the use or content of such cookies. Information on how they are processed, the purposes of their use, and management options can be found in the privacy policies and cookie policies of the relevant third parties.
- 8.7. The Controller retains cookies for the period necessary to fulfil their purpose, but no longer than 14 months from the date they are stored, unless a shorter period is specified for a particular type of cookie. The Controller retains records of the granting or withdrawal of consent to the use of optional cookies for a period of 4 years for the purpose of demonstrating compliance with the Controller's obligations under applicable legal regulations.
- 8.8. In the event of any questions concerning the use of cookies or the processing of personal data in connection with their use, you may contact the Controller electronically at the email address: support@tollpay.sk, or in writing at the registered office address: Kostolná 933/16, 013 01 Teplička nad Váhom, Slovak Republic.

9. Complaint

- 9.1. If you believe that the Controller processes your personal data in breach of applicable legal regulations, or if you are not satisfied with the manner in which your personal data are processed, you may contact the Controller electronically via the email address support@tollpay.sk or in writing at the Controller's registered office address: Kostolná 933/16, 013 01 Teplička nad Váhom, Slovak Republic.
- 9.2. Contacting the Controller does not affect your right to lodge a complaint with the supervisory authority, which is:
Office for Personal Data Protection of the Slovak Republic
Galvaniho Business Centrum II
Galvaniho 7/B
821 04 Bratislava
Telephone: +421 2 32 31 32 14 / +421 2 32 31 32 49
Email: statny.dozor@pdp.gov.sk
- 9.3. You may exercise your right to lodge a complaint in particular if you believe that the processing of your personal data violates the General Data Protection Regulation (GDPR) or other legal regulations governing the protection of personal data.

10. Data Security

10.1. The Controller adopts appropriate technical and organisational measures to protect personal data against unauthorised access, loss, misuse, or destruction.

11. Contact

11.1. If you have any questions regarding the protection of personal data or wish to exercise your rights, please contact the Controller electronically at the email address: support@tollpay.sk, or in writing at the registered office address: Kostolná 933/16, 013 01 Teplička nad Váhom, Slovak Republic.

12. Final Provisions

12.1. This Privacy Policy shall become effective on the date of its publication, i.e. on 25 June 2026. The Controller reserves the right to amend this Privacy Policy if there is any change in the processing of personal data.