

# The principles of personal data protection

The Controller	PHATEC s.r.o.
Having its registered office at	Svitavská 1256, 57001 Litomyšl
Email	havelkova@phatec.com

### Information about personal data processing

PHATEC s.r.o. having its registered office at Svitavská 1256, 57001 Litomyšl, Company Number: 28772041, attends to protecting the personal data that you provide us with. It is important that you know that we process the personal data that you provide us with responsibly, in a transparent manner and in accordance with REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL. You have the right to request information about the personal data we have about you on record, the right of rectification and the right of erasure, if such data have been provided with your consent. If automated processing occurs, you have the right to the portability of data and the right not to be subject to decisions based solely on automated processing. If you have any questions or requests to concern the processing of your personal data, you can contact us in writing at the address of the company's registered office.

# Safeguarding your personal data

PHATEC s.r.o. attends to safeguarding the personal data that you provide us. We have taken adequate technical and organisational measures to be able to sufficiently protect your data with regard to the relevant of their processing. No unauthorised person has access to the personal data which we have received from you and we do not transfer your data to other subjects for onward processing without your consent, unless required by law or in order to protect our legitimate interests.

# The scope of personal data processing

Personal data are processed to the extent to which the data subject has provided them, i.e. in connection with entering into a contractual or other legal relationship with the Controller, or which PHATEC s.r.o. has collected in some other way and processes in accordance with the valid and effective legal regulations or to discharge the statutory obligations of the Controller.

Personal data are obtained directly from data subjects and from public records.

The subjects whose personal data are processed are primarily:

- existing and potential customers
- suppliers
- the employees of the Controller
- or other subjects when there is a legitimate interest involved in processing their personal data





### The period of time for which your personal data are stored

We only store your personal data for the absolutely required period of time and archive them according to the statutory time limits imposed on us by legal regulations.

We process personal data for the period of duration of a contractual relationship or on other legal ground that allows us to process your personal data. This means that we have internal rules in place that verify the lawfulness of holding personal data and that we do not hold data for longer than we are authorised to. Once the lawful ground for holding personal data ceases to exist, we erase the relevant personal data.

We only store the personal data which we process with your consent for the duration of the purpose for which consent has been given.

### The categories of personal data concerned

Data about subjects which are used for their unambiguous and distinctive identification are classified under the following categories:

- identification data (first name, surname, Personal Number, date and place of birth, function, number of proof of identity, sex, nationality, whether the subject is a politically exposed person, tax domicile and tax number)
- contact details (address of place of residence, telephone number, e-mail address)
- other data (bank account number)
- data provided and processed within the bounds of consent given by the data subject (processing photographs, videos, the use of personal data for the purposes of selection procedure)

# The purposes of processing your personal data

Personal data is only collected and processed for the set purpose, to the extent and for the period of time required to fulfil the set purpose, which might be:

- the performance of a contract
- negotiations to concern a contractual relationship
- offering trade and services
- selection procedure for vacant employment positions
- contacting the authorised person of a business partner
- managing and documenting tax agenda and accounting
- managing payroll and keeping records of employees
- protecting property

# Personal data processors

Your personal data is processed by the Controller itself or by processors, who also provide sufficient and credible guarantees of the technical and organisational safeguarding of personal data protection. Processors or other processors only process personal data based on a contract for personal data processing.

List of the most significant processors that have access to certain personal data of clients to the extent required for the set purpose, whilst adhering to all security principles:

- network administrators
- external accountants





### Personal data recipients

The Controller must in certain cases provide personal data to the following recipients:

- the providers of postal and communication services and of electronic communication services
- bodies of public authority

#### Website

When you access and browse our website, we do not process any protocol files.

Some parts of the site might ask you for information in order that we can contact you (e-mail and/or telephone contact, name, or name of company). The Controller has legitimate interest in processing the specified personal data for the purpose of providing an offer and for the possible conclusion of a master contract in the future. You will be informed of which information is required and which is optional. Provided contacts are stored for a period of 1 year.

### Information about the rights of data subjects

### The right to information

You have the right to ask the Controller for information about what sort of personal data we process about you, the extent of such data and the purpose for which we process them. We will provide you with this information without charge within a maximum time limit of 30 days, or within a maximum time limit of 90 days in extraordinary situations. We will inform you in time of an extension of the time limit in such extraordinary cases. If you require us to communicate the information we have on record about you, we first need to make sure that you are actually the person to whom this information pertains. You should therefore provide sufficient identification of your person in your request. If required, we have the right to ask you for additional information to identify you before we provide you with the personal data which we process about you.

We also have the right to legitimately reject a request for information which is groundless, which is made unreasonably often or which would involve a disproportionate effort to obtain or would be hard to get (typically from back-up systems, archive materials, etc.).

### The right to data portability

You have the right to receive the personal data which we keep on record about you in a structured, commonly used and machine-readable format.

Such data may be transferred to another controller at your request.

#### Updating data, the right of rectification

Given that personal data might change over time (for example, a change of surname), we would be happy if you were to inform us that such a change has taken place for you in order that we have up-to-date personal data and that no errors are made. Providing information about a change to data is absolutely required so that we are able to execute our activity as a controller in the proper manner.



Related to this is your right to the rectification of the personal data which we have on record about you. If you discover that our data is out of date, you have the right to request that they be rectified.

#### Objections

If you believe that we are not processing your personal data in accordance with the valid legislation of the Czech Republic and of the Union, you have the right to lodge an objection and we will subsequently check whether your request is legitimate or not. Whenever you lodge an objection, the processing of your personal data will be limited until such time as we have verified whether the objection is legitimate. We will also inform you of your right to contact the competent supervisory body with an objection to the processed personal data which we process about you. This body is Úřad pro ochranu osobních údajů (Office for Personal Data Protection), which you can contact at the following address:

Úřad pro ochranu osobních údajů Pplk. Sochora 27 170 00 Praha 7.

### The right to restriction of processing

You have the right to restriction of processing of your personal data in the case that you believe that the data on record are not accurate or that processing is unlawful, or if you believe that we no longer need such data for the purposes of their processing.

### The right to erasure

If you have at some time given us consent to process your personal data (for example, e-mail address for sending out a newsletter), you have the right to withdraw such consent at any time and we are obliged to erase the data which we process solely based on your consent. The right to erasure does not apply to data processed within the bounds of the obligation to perform a contract, for statutory reasons or in our legitimate interest. If any of your data is also stored in back-up systems which automatically safeguard the resilience of all our systems and perform the function of protection against losing data in cases of accidents, it is not within our capabilities to erase such data from back-up systems too, and in many cases not even technically feasible. However, such data are not actively processed any further and shall not be used for other purposes of processing.

#### Who you can contact

You can also contact us with any questions regarding personal data protection which you might have by sending an e-mail to havelkova@phatec.com or at our company registered office:

PHATEC s.r.o. Svitavská 1256, 57001 Litomyšl.

#### Transferring personal data to third countries

We do not transfer personal data to processors or to other recipients in third countries or in international organisations.

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