

PERSONAL DATA PROCESSING INFORMATION MEMORANDUM

Dear clients, business partners and employees,

the document you are reading now contains basic information on how we process personal data. We appreciate you sharing your personal data with us and are committed to fully protecting it as possible. We also strive to be as transparent as possible with you, particularly about how we process your personal data.

In view of the new European Union legislation, this Information Memorandum has been prepared in accordance with 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 ("GDPR").

Who do you entrust with your personal data?

You provide your personal data to the company (i.e. the personal data controller) **ISECO.CZ s.r.o.** with the registered office: Bartůňkova 2349/3 Prague 4 149 00, ID No.: 036 41 074, registered in the Commercial Register maintained by the Municipal Court in Prague under the registration number C235262 (hereinafter referred to as the "**Company**").

Your personal data may also be processed by external company personnel, such as an external tax and accounting company or the operator of an e-mail system. We carefully select the entities that

work with us on the basis of safeguards to ensure the technical and organisational protection of the personal data transmitted.

The processing of personal data may only be carried out for the company by processors, exclusively on the basis of a contract for the processing of personal data concluded by the company with them. Current list of processors:

- Prolex Tax management, s.r.o.
- Microsoft
- Raynet, s.r.o.
- MailChimp
- DNS a.s.

For what purpose do we need personal data?

We process and use your personal data to:

- To ensure the conclusion and subsequent performance of a contractual obligation between us and you, as well as to comply with the legal obligations arising from such relationship,
- To protect our legitimate interests, which are the proper performance of all our contractual obligations to you (e.g. warranties), the proper performance of all our legal obligations, the protection of our business and property and, last but not least, the protection of the environment and ensuring sustainable development,
- To ensure the employer's legal obligations,
- For direct marketing and related activities (profiling suitable clients),
- For the implementation of educational and information seminars.

Authorisation for processing

The lawfulness of the processing is determined by Article 6(1) of the GDPR, according to which the processing is lawful if it is necessary for the performance of a contract, for the fulfilment of a legal obligation of the controller, for the protection of the legitimate interests of the controller or the processing is based on the consent you have given us. Providing personal data to the controller is generally a legal or contractual requirement. With regard to the provision of personal data for marketing purposes, which does not constitute the performance of a contractual or legal obligation to the controller, your consent is required. If you do not give consent to the controller to process your personal data for marketing purposes, this does not mean that the controller will refuse to provide you with a service under the contract as a result.

In order to ensure the greatest possible protection of your privacy, you have the right to object to your personal data being processed solely for the most necessary lawful reasons or to have your personal data blocked. You can read more about your rights related to the processing of personal data in the text of this information memorandum below.

How was the personal data obtained?

We obtain personal data directly from you, in particular from mutual communication, from contacts at trade fairs, trainings, presentations and other similar professional events or from contracts concluded. In addition, personal data may also come from publicly available sources, registers and records, such as the commercial or trade register, debtors' register and professional registers. However, we will only process such personal data for the exercise of our legitimate interests or in the performance of our legal obligations. In addition, we may have obtained your personal data from third parties who are authorized to access and process your personal data, to the extent and for the purposes for which you have authorized them.

What categories of personal data are processed?

We process the following categories of personal data to ensure the proper performance of our obligations, to ensure compliance with legal obligations, and for the other purposes listed above:

CLIENTS

1. basic identification data - name, surname
2. contact details - telephone number and email address, if you have given us your consent;
3. information about your use of our products and services - this includes information about what products you have ordered from us and what you are using now, including the exact specifications of the products etc;
4. information from mutual communication - information from emails, phone records or other contact forms;
5. billing and transaction data - this includes information appearing on invoices, agreed billing terms and payments received;

BUSINESS PARTNERS

1. basic identification data - name, surname
2. contact details - telephone number and email address, if you have given us your consent;
3. information from mutual communication - information from emails, phone records or other contact forms;
4. billing and transaction data - this includes information appearing on invoices, agreed billing terms and payments received;

EMPLOYEES

1. basic identification data - name, surname, residential address, date of birth and identification

number, purpose of residence, ID card number, passport number for non-Czech nationals, visa number and validity, nationality;

2. contact details - telephone number and email address, if you have given us your consent;

What is our legal basis for processing personal data?

The lawfulness of processing is determined by Article 6(1) of the GDPR, according to which processing is lawful if it is necessary for the performance of a contract, for the fulfilment of a legal obligation of the controller or for the protection of the legitimate interests of the controller. The lawfulness of processing in the case of our company is based, for example, on Act No. 326/1999 Coll., on the residence of foreigners in the Czech Republic, Act No. 563/1991 Coll., on accounting, according to which invoicing data is processed and stored, Act No. 89/2012 Coll., the Civil Code, according to which the controller defends its legitimate interests, or Act No. 235/2004 Coll., on value added tax and some others.

Will we be passing on personal data to anyone else?

We must, within the limits of the law, disclose personal data to public authorities, such as tax authorities, courts or law enforcement authorities.

Will we transfer personal data to a third country or international organisation?

We will occasionally transfer personal data to countries outside the European Economic Area. In any case, we will do so while maintaining all security measures, we will require the same from the processor, and we will comply with all international treaties, decisions of the European Union authorities and the current conditions for such transfers, as listed on the website of the Czech Data Protection Authority. However, such transfers will always only take place pursuant to a written agreement between us and the third party.

How long will we store personal data?

Personal data will never be kept for longer than the specified maximum resulting from the purpose of processing the data. After the expiry of the archiving period, the personal data will be securely and irretrievably destroyed so that it cannot be misused.

Personal data will be processed and stored for at least the duration of the contract. Certain personal data (e.g. necessary for tax and billing obligations) will be stored for 5 years starting from the year following the occurrence of the stored fact, but in any case only for the period directly stipulated by law in the event of a statutory deadline.

Personal data which are important for the exercise of the legitimate interests of the controller and will be kept for a maximum of 3 years from the end of the contractual relationship with the

controller.

Personal data processed for marketing purposes will be retained for a maximum of 5 years from the time you attended an event organised by us or our partners.

In justified cases, personal data may be subject to processing for the purpose of dealing with legal matters, including the performance of obligations towards public authorities, monitoring and ongoing evaluation of legal risks (legitimate interest of the controller).

What are your rights in relation to the processing of personal data and how can you exercise them?

We do everything possible to ensure that the processing of your data is carried out properly and, above all, securely. You are guaranteed the rights described in this section, which you can exercise with us.

How can you exercise your rights?

You can exercise individual rights by sending an email to privacy@iseco.cz. You can also exercise your rights by sending a written request to our mailing address.

We will provide you with all communications and statements regarding the rights you have exercised free of charge. However, if the request is manifestly unfounded or unreasonable, in particular because it is repetitive, we are entitled to charge a reasonable fee taking into account the administrative costs involved in providing the information requested. In the event of a repeated request for copies of the personal data processed, we reserve the right to charge a reasonable fee for the administrative costs for this reason.

We will provide you with a statement and, where appropriate, information on the measures taken as soon as possible and within one month at the latest. We are entitled to extend the time limit by two months if necessary, taking into account the complexity and number of requests. We will inform you of the extension, including the reasons for it.

Right to information about the processing of your personal data

You are entitled to request information from us as to whether or not personal data is processed. If personal data are processed, you have the right to request information from us, in particular, about the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipients of the personal data, the authorised controllers, a list of your rights, the possibility to contact the Data Protection Authority, the source of the personal data processed and automated decision-making and profiling. The information provided to you in exercising this right is already contained in this memorandum, but this does not prevent you from requesting it again.

Right of access to personal data

You are entitled to request information from us as to whether or not your personal data is

processed and, if so, you have access to information about the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipients, the period of storage of the personal data, information about your rights (rights to request from the controller rectification or erasure, restriction of processing, to object to such processing), the right to lodge a complaint with the Data Protection Authority, information on the source of the personal data, information on whether automated decision-making and profiling takes place and information concerning the procedure used as well as the significance and foreseeable consequences of such processing for you, information and safeguards in case of transfer of personal data to a third country or an international organisation. You have the right to be provided with copies of the personal data processed. However, the right to obtain this copy must not adversely affect the rights and freedoms of others.

Right to correction

If there has been a change on your part, for example, of your residence, telephone number or other fact that can be considered personal data, you have the right to request us to correct the personal data processed. In addition, you have the right to have incomplete personal data completed, including by providing an additional declaration.

Right to erasure (right to be forgotten)

In certain specified cases, you have the right to request that we delete your personal data. These cases include, for example, that the data processed is no longer necessary for the purposes mentioned above. We will delete your personal data automatically after the period of necessity has expired, but you can contact us at any time with your request. Your request will then be subject to an individual assessment (despite your right to erasure, we may have an obligation or legitimate interest to retain your personal data) and you will be informed in detail about the processing of your request.

Right to restriction of processing

We process your personal data only to the extent necessary. However, if you feel that we are, for example, going beyond the purposes for which we process your personal data as set out above, you can request that your personal data be processed solely for the strictly necessary legitimate purposes or that your personal data be blocked. Your request will then be subject to an individual assessment and you will be informed in detail about the processing.

Right to data portability

If you wish us to provide your personal data to another controller or another company, we will transfer your personal data in the appropriate format to the entity you designate, unless we are prevented from doing so by any legal or other significant impediment.

Right to object and automated individual decision-making

If you become aware or believe that we are processing personal data in violation of the protection of your private and personal life or in violation of the law (provided that the personal data is



processed by the controller on the basis of public or legitimate interest, or is processed for direct marketing purposes, including profiling, or for statistical purposes or for purposes of scientific or historical interest), you may contact us and ask for an explanation or rectification of the defect. You have the right not to be subject to automated decision-making (including profiling).

Right to lodge a complaint with the Office for Personal Data Protection

You may at any time contact the supervisory authority with your complaint or complaint regarding the processing of personal data, namely the Office for Personal Data Protection, located at Pplk. Sochor 27, 170 00 Prague 7, website <https://www.uoou.cz>.

How can you contact us?

If you have any questions regarding the processing of your personal data, please do not hesitate to contact us electronically at privacy@iseco.cz

In all cases, we can be contacted at our delivery address ISECO, Bartůňkova 2349, 149 00 Prague 4.