

Principles of Protection of Personal Data

The Controller of Personal Data **ARMATORY Group a.s.** with registered office Nádražní 129, 747 22 Dolní Benešov, Ident. No. 25572881 (referred to hereinafter as “Controller”) provides in conformity with Article 12 et seq. of the Regulation¹ the following information on personal data processing to the Data Subjects.

Data Subject means natural person whose personal data are being processed by the Controller (e.g., business partners of the Controller or their employees).

Whenever necessary, Data Subjects can address the Controller using the contacts below:

delivery address: Nádražní 129, 747 22 Dolní Benešov
data box address: p6tcv55
e-mail address: gdpr@agroup.cz
telephone: +420 553 680 111

Scope of Personal Data Processing

The Controller processes **the following categories of personal data:**

- Name and surname or company
- Address, registered office of the company
- Date of birth
- Identification number and tax identification number
- Telephone number
- E-mail address
- Account number
- Photographs and additional videograms
- Other personal data expressed in the Data Subject’s consent to the processing of personal data.

Personal data are collected from the Data Subject and public sources (such as Commercial Register, ARES – in particular to verify the accuracy of the personal data being processed).

The recipients of personal data are subjects to which the Controller is obliged to provide personal data on the basis of relevant generally binding legal regulations, as well as the employees of the Collector and/or other authorized subjects with regard to specific

¹ 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)

processing. The recipients of personal data are not subjects whose activity is not related to the activities and services provided by the Controller, unless the Data Subject consents to it.

The Controller does not intend to transfer personal data to third countries or an international organization.

Information about the protection of personal data, the existence of appropriate safeguards, and places of access to personal data will be provided by the Controller through the above mentioned contacts.

Duration of Personal Data Processing

Personal data are stored for as long as laid down by the relevant generally binding legal regulations if such processing is imposed or allowed by them. In other cases, the period of storage of personal data is set as the time required to exercise the rights or legitimate interests of the Data Subject, the Controller or third parties, or as the time required to defend the legal rights of the Controller and/or third parties. In the case of personal data processed on the basis of the Data Subject's consent to the processing of personal data, personal data are stored for the period specified in the processing consent. When determining the length of time for the storage of personal data, all aspects of that processing and the interests of the Data Subject are taken into account.

In cases where the processing of personal data is based on the fulfilment of legal obligations and their provision is a legal requirement, the Data Subject is obliged to provide personal data. In the case of non-disclosure of personal data, the statutory requirements cannot be fulfilled, which may lead to the failure of the performed actions. If the provision of personal data is a contractual requirement or a requirement to be included in the contract (and is not a fulfilment of legal obligations), in the case of refusal of providing personal data by the Data Subject a situation may occur where the contract cannot be concluded. However, the Controller does not make the conclusion of a contract subject to the provision of personal data by the Data Subject that are not necessary for the proper conclusion of the contract.

No automated decision-making, including profiling, takes place in the processing of personal data.

The Controller does not process personal data directly communicated by the Data Subject for purposes other than those communicated to the Data Subject at the time of handover. If the Controller intends to process such personal data for other purposes, the Controller will provide the Data Subject with information about that other purpose, as well as other information necessary to exercise his or her rights, before commencing processing.

Purpose and Legal Basis of Personal Data Processing

Processing of personal data is done mainly for the purpose of **proper management of prescribed paperwork and compliance with legal regulations (accounting), conduct of the**

business activity and provision of services related to the business activity of the Controller, and management of the database of business partners.

The legal basis for the processing is the **compliance with legal obligations of the Controller** (Article 6(1)(c) of the Regulation), the fact that **processing is necessary for the performance of a contract** (Article 6(1)(b) of the Regulation) or **for the purposes of the legitimate interests pursued by the Controller** (Article 6(1)(f) of the Regulation), or the consent of the Data Subject to the processing of his or her personal data (Article 6(1)(a) of the Regulation).

By processing the personal data of the Controller for the purposes of legitimate interests, the Controller keeps to the necessary extent the defense of his or her legal rights in the fulfilment of tasks connected with the subject of the entrepreneurial activity of the Controller, namely for defense of claims arising from contractual relations with the business partners of the Controller.

The processing of personal data on the basis of the Data Subject's consent is done strictly for the purpose expressed in the consent about which the Data Subject is always informed prior to granting it.

Rights of the Data Subject Following from Personal Data Processing

- Where processing is based on the Data Subject's consent to the processing of personal data, the Data Subject has the right to withdraw the consent at any time via e-mail gdpr@agroup.cz, without affecting the lawfulness of processing based on consent before its withdrawal.
- Right to lodge a complaint with a supervisory authority.
- Right to access to the personal data and right to obtain from the Controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, right to access to such personal data and information about their processing.
- Right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning him or her, or right to have incomplete personal data completed.
- Right to obtain from the Controller without undue delay the erasure of personal data concerning him or her under conditions specified in Article 17 of the Regulation.
- Right to obtain from the Controller restriction of processing of personal data under conditions specified in Article 18 of the Regulation.
- The Controller shall inform the Data Subject about recipients of personal data if the Data Subject requests it.
- Right to receive the personal data concerning him or her, which he or she has provided to the Controller, in a structured, commonly used and machine-readable

format, and right to transmit those data to another controller under conditions specified in Article 20 of the Regulation.

- Right to object at any time to processing of personal data concerning him or her under conditions specified in Article 21 of the Regulation.
- Right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her under conditions specified in Article 22 of the Regulation.

The above principles of protection of personal data enter into effect on 25 May 2018.

ARMATORY Group a.s.

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