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INFORMATION MEMORANDUM ON PERSONAL DATA PROCESSING

Dear business partners,

The document you are reading contains basic information on how we process your personal data. We appreciate the fact that you share your personal data with us and we intend to protect it to the greatest possible extent. We also try to be as transparent as possible in relation to you, particularly with regard to the manner in which your personal information is processed.

With the new European Union legislation being introduced, this information memorandum was developed pursuant to Regulation of the European Parliament and of the Council (EU) 2016/679 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 on repealing Directive 95/46/EC (*GDPR*).

To provide the information in the most lucid possible manner, we chose the form of answers to the questions you might ask and we would give. The information is provided in the following order:

1. Who is the personal data controller?
2. What purpose do we need personal data for?
4. How was personal data obtained?
4. What categories of personal data are processed?
5. What is the legal ground for processing personal data?
6. Will your personal data be transferred to third parties?
7. Will your personal data be transferred to a third country or international organisation?
8. How long will your personal data be stored?
9. What are your rights related to the processing of personal data and how can you exercise them?
10. Is personal data automatically evaluated?

This information memorandum submits the basic information we are obliged to provide as the controller of personal data. Should you be interested in the details of the Personal data processing policy we comply with, please go to: www.spolchemie.cz/en/privacy-policy-principles.

Please do not hesitate to contact us if you have any queries regarding the processing of your personal data at the following email address gdpr@spolchemie.cz. You can always contact us at our correspondence address if necessary.

1. Who is the personal data controller?

The data controller determines the purposes for which and the means by which personal data is processed, he/she does so on his/her own or together with other persons.

The personal data controller is the company:

Spolek pro chemickou a hutní výrobu, with its registered office at Revoluční 1930/86, Ústí nad Labem-centrum, 400 01 Ústí nad Labem, company business Id. No. 00011789, a company entered in the Commercial Register kept by the Regional court in Ústí nad Labem, section B, case number 47.

2. What purpose do we need personal data for?

The controller processes personal data for the following purposes:

- a) to enter into a contract between you and the controller and to comply with the contractual conditions (Art. 6, par. 1(b), GDPR). Other lawful obligations follow from such a relationship and the controller is obliged to process personal data for this purpose as well (Art. 6, para. 1 (c), GDPR);
- b) direct marketing so that the controller can tailor the offer of its products, services and business communication on them to your needs as effectively as possible,
- c) marketing purposes, including PR activities, outside the scope of a legitimate interest, i.e., containing profiling and the offer of products and services of our partners and other members of the SPOLCHEMIE Group; the controller should obtain your explicit consent for that purpose of processing (Art. 6, para. 1(c), GDPR);
- d) to protect its legitimate interest (Art. 6, para. 1(f), GDPR).

Providing personal data to the controller is a general statutory and contractual requirement. Your consent is required for the provision of personal data for marketing purposes, which does not constitute the performance of contractual or statutory obligations of the controller. Should you decide not to give your consent to the processing of personal data for marketing purposes, this does not mean that the controller will refuse to provide its product or service under the contract to you in consequence of this.

3. How was the personal data obtained?

The personal data was obtained by the controller directly from you, particularly from filled-in forms, mutual communication or concluded contracts. Apart from that, personal data can also come from publicly available resources, registers and records, such as the Commercial Register, Register of debtors, professional registers, or the Land Register. Furthermore, the controller could have obtained the personal data from third parties authorised to access and process your personal data which it cooperates with, as well as from social networks and Internet, placed there by yourself.

4. What categories of personal data are processed?

To ensure the purposes above, the controller processes the following personal data:

- a) basic identification data – name, surname, date of birth, home address, birth number and identification number;
- b) contact details – telephone number and e-mail address;
- c) information on using the products and services of the controller – these are details on what products you contracted from the controller and what products you use now, including product setup, etc.;
- d) information from mutual communication – information from emails, recordings of telephone calls or other forms of contact;
- e) billing and transaction details – these are particularly the information shown in invoices, on agreed billing conditions as well as on received payments;

5. What is the legal ground for processing your personal data?

The lawfulness of processing is specified in Article 6, para. 1, GDPR, under which processing shall be lawful if it is necessary to perform the contract, to comply with the statutory obligations of the controller, to protect the legitimate interests of the controller, or the processing is carried out based on the consent you granted to us.

The lawfulness of processing is also regulated by Act No. 563/1991 Coll., on accounting, subject to which billing details are processed and stored, Act No. 89/2012 Coll., of the Civil Code, under which the controller protects its legitimate interests, and Act No. 235/2004 Coll., on value added tax.

6. Will your personal data be transferred to third parties?

We are required to provide some of your personal data to public administration authorities by legal regulations, for example, to the tax administration, courts, criminal procedure authorities or stock market surveillance authorities.

7. Will your personal data be transferred to a third country or international organisation?

Your personal data will not be transferred to countries outside the European Union or European Economic Area, or to any international organisations.

8. How long will your personal data be stored?

Your personal data will be processed and stored for at least the term of the agreement. Some personal data necessary for tax and billing obligations, for example, will be stored longer, usually 5 years beginning from the year following the incurrence of the stored details.

Your personal data important for exercising the legitimate interests of the controller will be stored for a maximum of 3 years from the end of the contractual relationship with the controller.

Personal data will never be kept for a period longer than the maximum period specified by the law. After the expiry of the storage period, the personal data will be irrecoverably destroyed in a safe manner in such a way that the data cannot be misused.

9. What are your rights related to the processing of personal data and how can you exercise them?

The controller does his/her best to ensure proper and secure processing of your data. You are guaranteed the rights described in the Personal data protection policy published on the website of the controller.

10. Is personal data automatically evaluated?

Personal data is not automatically evaluated.