

Personal data protection statement The company 3P, spol. s ro, with its registered office at Ostopovická 285/17, Bosonohy, 642 00 Brno, Company ID: 494 48 421, hereinafter referred to as the "Administrator", when processing personal data, is governed in particular by 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), (hereinafter referred to as the "GDPR") and Act No. 101/2000 Coll. on the protection of personal data, as amended.

#### Definitions of terms

**Data subject:** an identified or identifiable natural person, i.e. e.g.: • employee of the Administrator, • job applicant, • customer, • customer representative • external worker, • supplier representative, • customer • natural person citizen • natural person with ID number

**Personal data:** all information about a natural person that can be directly or indirectly identified, e.g. name, surname, date of birth, social security number, location data (address), network identifier (telephone, e-mail, social networks, etc.).

**Special categories of personal data:** a specific element of the physical, physiological, genetic, mental, economic, cultural or social identity of a natural person, i.e. personal data revealing national, racial or ethnic origin, political opinions, trade union membership, religion or philosophical beliefs, criminal convictions, health and sex life, biometric data which allows the direct identification or authentication of the data subject.

#### Controller's Responsibility As

the Controller, we are responsible for all processing of your personal data within the framework of our organization's agenda. We also handle your requests (e.g. for correction, deletion, information about your personal data), objections, and provide you with information about how and why we process your personal data.

## Personal data processing policies

When processing personal data, we comply with the highest standards of personal data protection and adhere in particular to the following

principles: a) we always process personal data for a clearly and comprehensibly specified purpose, by specified means, in a specified manner, and only for the period that is necessary for the purposes of their processing; we only process accurate personal data and their processing corresponds to the specified purposes and is necessary for the fulfillment of these purposes; b) personal data are protected in a manner that is in line with current technical developments; the highest available level of security for these data is ensured, which prevents any unauthorized or accidental access to personal data, their alteration, destruction or loss, unauthorized transfers, their other unauthorized processing, as well as other misuse;

c) data subjects are informed about the processing of personal data and about their rights to accurate and complete information about the circumstances of this processing, as well as other related rights; d) as *the Controller*, we comply with appropriate technical and organizational measures,

### Information about the processing of personal data

*The administrator* processes personal data for the purpose of:

- fulfillment of statutory obligations when acting in the position of *the Controller* of personal data; • fulfillment of contractual obligations when personal data have been transferred by data subjects; • fulfillment of contractual obligations when personal data have been transferred to *the Controller* by personal data controllers of other parties and *the Controller* acts as a processor; • for the fulfillment of contractual obligations when the data subject is a party to the contract; • protection of the rights and legitimate interests of *the Controller*; • for business and marketing purposes, if consent has been given by the data subjects or it is a legitimate interest of *the Controller* in the case of

### Scope of processed personal data: *The Administrator*

processes personal data to the extent necessary to achieve the above objectives. The following personal data are processed in particular: a) name and surname; b) date of birth; c) social security number; d) address; e) email address; f) telephone number; g) IP address and other electronic identifiers; h) and other personal data that *the Administrator* is obliged to manage on the basis of specific legal titles in individual cases of processed personal data.

*The Administrator* does not process special categories of personal data unless there is a legal basis for their processing.

### Method of processing personal data: *The*

method by which *the Controller* processes personal data includes both manual and automated processing in *the Controller's* information systems. Personal data is processed primarily by *the Controller's* employees and, to the necessary extent, also by third parties. Before any transfer of personal data to a third party, a contract is concluded with this person, which contains the same guarantees for the processing of personal data as the Controller observes in accordance with its legal obligations .

*The administrator* has taken technical and organizational measures to ensure the protection of personal data, in particular measures to prevent unauthorized or accidental access to personal data, their alteration, destruction or loss, unauthorized transfers, their unauthorized processing, as well as other misuse of personal data.

### Recipients of personal data

Personal data are made available in particular to *the Administrator's* employees in connection with the performance of their work duties, in which it is necessary to handle personal data, but only to the extent that is necessary in any given case and in compliance with all security measures. Personal data may be made available to third parties who participate in the processing of personal data, or these personal data may be made available to them for another reason in accordance with the law. Before any transfer of personal data to a third party, a written contract is always concluded with this person, which regulates the processing of personal data so that it contains the same guarantees for

processing of personal data, which the Administrator itself complies with in accordance with its legal obligations .

In accordance with the relevant legal regulations, *the Administrator* is legally or directly obliged to transfer Your personal data:

a) to the relevant state administration bodies, courts and criminal prosecution authorities for the purpose of fulfilling their obligations and for the purposes of enforcing decisions; b) to payment service providers, if necessary for the purpose of preventing, investigating or detecting fraud in the field of payment transactions; c) to state administration bodies and other public authorities for the purpose of fulfilling legal obligations; d) to other persons to the extent specified by law, for example to third parties for the purposes of debt collection; e) to entities providing *the Administrator* with services on an outsourcing basis and acting as a processor of personal data;

Transfer of personal data abroad Personal data is

processed in the Czech Republic and in some cases may be transferred to EU countries.

Duration of personal data processing \_\_\_\_\_

Personal data is processed *by the Administrator* only for the period necessary for the purposes of their processing. The retention period for personal data results from the individual legal titles and regulations on the basis of which *the Administrator* processes personal data and the retention period is further in accordance with *the Administrator's Filing, Archiving and Disposal Rules*.

Processing of personal data within the framework of electronic \_\_\_\_\_

communication *The Administrator* processes within the framework of electronic communication (via contact form or email) within the meaning of Regulation (EU) No. 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, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter referred to as the "Regulation"), in particular your following personal data: in the event that they are provided

- Name and surname; •
- Email address; • Phone number
- IP address
- Subject •
- Message

Name, surname, e-mail address, telephone number, IP address, and other data are processed to enable communication between you and our company.

We record and process personal data in accordance with the applicable laws of the Czech Republic and the above-mentioned Regulation (EU) No. 2016/679 of the European Parliament and of the Council for the purpose of processing your order or inquiry.

The retention and processing of personal data for the above-mentioned purpose is for a period of 6 months from the sending of the message in electronic communication, unless another legal regulation requires the retention of the communication for a longer period.

The above processing is permitted on the basis of Article 6(1)(b) of the Regulation, as it is processing necessary for the performance of a contract or for the implementation of measures taken prior to entering into a contract at the request of the data subject.

After this period, your data will be deleted and physically destroyed.

### Rights of the data subject 1.

#### Right to information You

have the right to ask *the Administrator* for information about what personal data we process about you, to what extent and for what purpose. We will provide you with this information in accordance with the principles of the General Regulation, in exceptional situations no later than within 90 days. We will inform you in a timely manner about the extension of the deadline in exceptional cases. If you request the disclosure of information that we record about you, we will first need to verify that you are indeed the person to whom this information belongs. Therefore, please provide sufficient identification of your person in your request. If necessary, we have the right to request additional information for your identification before we provide you with the personal data that we process about you.

It is our right to refuse requests for information that are unfounded, unreasonably repetitive, or that require disproportionate effort to obtain, or that would be difficult to obtain (typically from backup systems, archives, etc.).

#### 2. Updating data, right to correction Since

personal data may change over time (for example, change of surname), we would be happy if you inform us that any change has occurred in your case, so that we can keep your personal data up to date and avoid any errors. Providing information about changes in data is essential for us to be able to properly perform our activities as the Administrator.

This also includes your right to correct the personal data we hold about you. If you find that our data is no longer up to date, you have the right to request its correction.

#### 3. Objections

If you believe that we are not processing your personal data in accordance with applicable Czech and EU legislation, you have the right to raise an objection and we will subsequently verify the legitimacy of your request.

We inform you that you also have the right to object to the processing of personal data that we process about you to the competent supervisory authority for Personal Data Protection at the following address:

Office for Personal Data Protection Lt. Col.  
Sochora 27 170 00  
Prague 7

#### 4. Right to erasure If

you have ever given us consent to process your personal data, you have the right to withdraw it at any time and we are obliged to erase data that we process solely on the basis of your consent. The right to erasure does not apply to data processed within the framework of the obligation to perform a contract, legal reasons, or legitimate interests. If some of your data is stored in backup systems that automatically ensure the resilience of all our systems and serve the function of data loss protection in the event of accidents, it is not in our power to erase this data even from the backup systems and often it is not technically feasible. However, this data is not actively processed in any way and will not be used for other processing purposes.

#### 5. Right to restriction of processing This

right means that you have the right to object to the processing of your personal data if you find or believe that your personal data is being processed in violation of applicable legislation or that the processing could threaten your rights and freedoms. The cases where this may occur are: Right to rectification – you dispute the accuracy of your personal data. While we, as the data controller, verify the accuracy and correctness of the personal data, you have the right to ask us to restrict the use of such inaccurate data.

The processing of personal data is unlawful, but you do not request its deletion, but only requests restriction of processing of this data.

We, as the controller, no longer need the personal data for the purposes of processing (and we should delete), but you require them for the purpose of establishing, exercising or defending legal claims. You object to the processing. For the period during which it will be verified whether our interests prevail, as the controller or you as the data subject, it is necessary to restrict the processing of this data.

#### 6. Right to data portability

1. You, as a data subject, have the right to obtain the personal data concerning you that you have provided to the controller, in a structured, commonly used and machine-readable format, and you have the right to transmit this data to another controller without the controller to whom the personal data were provided preventing this, and this is the case

where: the processing is based on consent pursuant to Article 6(1)(a) or Article 9(2)(a) or on a contract pursuant to Article 6(1)(b); and the processing is carried out by automated means.

2. When exercising your right to data portability pursuant to paragraph 1, you, as the data subject, have the right to have personal data transmitted directly from one controller to another, where this is necessary technically feasible.

3. The exercise of the right referred to in paragraph 1 of this article shall be without prejudice to Article 17. This right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of public authority with which the administrator is entrusted.

4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.

#### 7. The right not to be subject to automated decision-making

This right ensures that you, as a data subject, will not be subject to a decision based on solely on automated processing, including profiling, which has legal effects for you or similarly significantly affects you. In other words, it is about ensuring that legal effects were not decided by automated procedures without human intervention, except possible exceptions.

Automated decision-making is permissible where it is necessary to conclude or perform a contract. contracts between you and the controller, if permitted by EU or Member State law, or if it is based on your explicit consent.

#### Where can you turn?

You can also contact us with your questions about personal data protection by email: [3p@3p.cz](mailto:3p@3p.cz) or at

Administrator's registered office :

3 P, Ltd.  
Ostopovicka 285/17,  
Bosonohy, 642 00 Brno