

## **Principles of Personal Data Processing and Protection**

### **I. Basic Provisions**

1. The processing of personal data is carried out in accordance with Act No. 110/2019 Sb., on the processing of personal data. KOVOLIT Česká, spol. s r.o., Id. No.: 44041861, with its registered office at č.p. 16, 664 31 Česká (hereinafter the “Controller”), is the controller of personal data pursuant to Article 4(7) of Regulation (EU) 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 (hereinafter the “GDPR”).

2. The contact details of the Controller are:

email: info@kovolitceska.cz,

telephone: +420 541 422 657

3. Personal data means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### **II. Sources and Categories of Personal Data Processed**

1. The Controller processes personal data that you have provided to it or personal data that the Controller has obtained on the basis of the fulfillment of your demand and/or order, a contract concluded with you, from public sources and from cooperating third parties.

2. The Controller processes your identification and contact details and data necessary for the performance of a contract and/or other legal requirements and/or the range of the Controller’s products and services.

### **III. Lawful Basis and Purpose of Personal Data Processing**

1. The lawful basis for the processing of personal data is

- the performance of a contract between you and the Controller pursuant to Article 6(1)(b) GDPR;
- the Controller’s legitimate interest in providing direct marketing (in particular for sending commercial communications and newsletters) pursuant to Article 6(1)(f) GDPR,
- Your consent to processing for the purposes of providing direct marketing (in particular for sending commercial communications and newsletters) pursuant to Article 6(1)(a) GDPR in conjunction with Section 7(2) of Act No. 480/2004 Sb., on certain information society services, in the absence of an order for goods or services.

2. The purpose of processing of personal data is

- the processing of your demand and/or order and the exercise of the rights and obligations arising from the contractual relationship between you and the Controller; the demand and/or order requires personal data that are necessary for the successful processing of the demand and/or order (name and address, contact details), the provision of personal data is a necessary requirement for the conclusion and performance of a contract, without the provision of personal data the contract cannot be concluded or performed by the Controller,
- sending commercial communications and performing other marketing activities.

### **IV. Data Retention Period**

1. The Controller shall retain personal data

- for the period necessary to exercise the rights and obligations arising from the contractual relationship between you and the Controller and to assert claims arising from such

contractual relationships (for a period of 5 years from the termination of the contractual relationship),

- until the consent to the processing of personal data for marketing purposes is withdrawn, but no longer than 5 years if the personal data is processed on the basis of consent.

2. After the expiry of the retention period, the Controller shall delete, anonymize or process the personal data only to the extent and for purposes for which your consent is not required.

#### **V. Recipients of Personal Data (Subcontractors of the Controller)**

Recipients of personal data are persons

- involved in the delivery of goods, services and payments under a contract,
- involved in the operation of the services,
- providing marketing services.

#### **VI. Your Rights**

1. Under the terms and conditions set out in the GDPR you have:

- the right of access to your personal data under Article 15 GDPR,
- the right to rectification of personal data pursuant to Article 16 GDPR or restriction of processing pursuant to Article 18 GDPR,
- the right to erasure of personal data pursuant to Article 17 GDPR,
- the right to object to processing pursuant to Article 21 GDPR; and
- the right to data portability pursuant to Article 20 GDPR,
- the right to withdraw consent to processing in writing or electronically to the address or email of the Controller specified in Article I of this Policy.

2. You also have the right to file a complaint with the Office for Personal Data Protection if you believe that your right to personal data protection has been violated.

#### **VII. Personal Data Security Policy**

1. The Controller declares that it has taken all appropriate technical and organizational measures to secure personal data.

2. The Controller has taken technical measures to secure data storage and storage of personal data in paper form, in particular the use of antivirus programs, secure storage of backups, secure access passwords, etc.

3. The Controller declares that only persons authorized by it have access to the personal data.

#### **VIII. Final Provisions**

1. By submitting a demand from the online order form, you confirm that you have become acquainted with the Personal Data Security Policy and that you accept it in its entirety.

2. The controller is entitled to change this Policy. The Controller shall publish the new version of the Personal Data Security Policy on its website or send you a new version of the Personal Data Security Policy to the email address you have provided to the Controller.

This Policy shall take effect on 23 September 2021