

## **SMALT BRNO, SPOL. s r.o., IČ 60747170**

with its registered office at Údolní 410/60, Veveří, 602 00 Brno

file number: C 18914 kept at the Regional Court in Brno

### **Information on the processing of personal data of natural persons**

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals 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 or GDPR) requires, inter alia, that each entity that processes personal data take appropriate organisational and technical measures, and ensure the protection of personal data of individuals (employees, clients, customers, etc.).

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

#### Personal data controller

The controller of personal data is the company SMALT BRNO, spol. s r.o., IČ 60747170, with its registered office at Údolní 410/60, Veveří, 602 00 Brno, registered in the Commercial Register, file number C 18914 kept at the Regional Court in Brno (hereinafter referred to as the "Administrator").

You can contact the personal data controller:

- in writing at Údolní 410/60, Veveří, 602 00 Brno,
- by e-mail [smalt@smalt.com](mailto:smalt@smalt.com),
- or by phone on working days at +420 543 210 756.

You can request details of the processing of personal data from the listed contacts and exercise your rights in relation to the processing of personal data.

The administrator did not appoint a data protection officer.

#### Automated individual decision making

The administrator does not perform automated individual decision-making or profiling within the meaning of Article 22 of the GDPR Regulation.

#### Legal titles of processing - fulfillment of legal obligations

Personal data of natural persons - employees and other employees of the Administrator are processed on the basis of valid legal regulations, especially the Labor Code for the needs of ensuring the settlement of wages and taxes, proving in relation to the Labor Inspectorate, Czech Social Security Administration, health insurance companies and the Financial Administration of the Czech Republic.

Personal data of natural persons - clients, suppliers and / or partners The administrator of natural persons and / or contact persons of suppliers and clients of legal entities are processed for the purposes of proving to the Financial Administration of the Czech Republic, or to other public administration institutions.

Legal titles of processing - performance of the contract

Personal data of natural persons, clients, suppliers and / or partners Administrator of natural persons and / or contact persons of suppliers and clients of legal entities are processed on the basis of performance of the Service Agreement - without provided information (personal data) by the client or supplier services provided.

For the purpose of fulfilling the Contract for the provision of services, the following is processed: name and surname, date of birth / ID number, address of residence / registered office, telephone, e-mail, or other data communicated by the subject of personal data.

All contracts and other documents of a commercial nature (especially orders, invoices) are kept in electronic and paper form for 10 years, including documents, for the purposes of accounting processing and for the purposes of proving to public administration institutions (Financial Administration of the Czech Republic, etc.) on payments.

Legal titles of processing - legitimate interest

Personal data of natural persons - employees, clients of the Administrator and / or their contact persons (including potential clients) and suppliers of the Administrator and / or their contact persons (including potential suppliers) are processed on the basis of legitimate interest in the following cases:

- pre-contractual negotiations on the establishment of an employment relationship and ensuring a smooth relationship with clients (and potential) in the performance of services (in the range of name, surname, contact address, e-mail address, telephone, or other personal data communicated by the entity important to ensure services) a period of 5 years from the last contact (ie termination of employment for employees, last use of the Client's services by the client, last provision of services by the supplier) by the subject of personal data;
- proving the competence of the Administrator as a service provider in the form of references;
- marketing activities towards existing clients;
- provision of supplier services and subcontracting and external processing of personal data, including simple access (in the range of name, surname, contact address, e-mail address, telephone, or other personal data communicated by the entity important for ensuring services) for 10 years from the last contact with the personal data subject.

Legal titles of processing - consent to the processing of personal data

Personal data of natural persons - clients of the Administrator and / or contact persons of clients and employees of the Administrator (in the range of name, surname and photos) are processed on the basis of clients' consent to the processing of personal data Services and PR Administrator.

The controller is entitled to process personal data on the basis of consent only for the period for which the consent was granted. The consent may be revoked by the data subject at any time in writing or may be renewed by the personal data subject. The consent applies only to the person who signed the agreement or otherwise verified it electronically. The consent is written and registered in electronic form as a separate document.

Rights of natural persons and / or clients of the Administrator related to the processing of personal data

You have the right at any time to contact the above contacts of the Administrator and claim your rights that are natural persons - ie employees of the Administrator (incl. Potential), suppliers and clients to natural persons (incl. Potential) or contact persons of suppliers and clients of legal entities ( incl. potential) - given by the GDPR regulation:

Right of access to personal data: You have the right to obtain confirmation of whether we process personal data about you and, if so, you have the right to access this data, including information on: for what purpose personal data are processed, on the processing procedure, for how long this data will be stored and whether the data is made available to other entities.

Right of correction: You have the right to have inaccurate personal data concerning you without undue delay. You also have the right to complete incomplete personal data.

Right of erasure (right to be forgotten): You have the right to have your personal data erased and not further processed if any of the following conditions are met: the data are no longer needed for the purposes for which they were collected or otherwise processed; if the data is processed on the basis of your consent, you revoke this consent and there is no other legal reason for processing; you object to the processing and there are no overriding legitimate reasons for the processing; raise an objection to the processing of data processed for direct marketing purposes; the data were processed illegally.

The administrator processes personal data of clients of natural persons, resp. contact persons of legal entities, especially for the purposes of performance of the Contract for the provision of services, and it is therefore not possible to effectively ensure the termination of their processing within 10 years from the end of their provision. In the case of consent to the processing, such consent may be revoked only in cases where consent to the processing of personal data has been provided (especially for marketing and promotional purposes of the Administrator).

Right to restrict processing: You have the right to temporarily restrict the processing of your personal data if any of the following conditions are met: you deny the accuracy of this data; processing will be limited to the time needed to verify the accuracy of the data; processing is illegal; we no longer need the data for processing purposes, but you request it to defend legal claims; you objected to the processing; processing will be limited until it is verified that the legitimate reasons for processing outweigh your legitimate reasons.

After clarification or correction of inaccuracies, further processing of personal data is governed mainly by the legal reason and purpose of processing.

Right to data portability: You have the right to obtain your personal data in a structured, commonly used and machine-readable format and have the right to transfer this data to another entity provided that the processing is carried out automatically and that you have provided the data with your consent or processed on on the basis of performance of the contract.

**Right to object:** You have the right to object to the processing of your personal data if they are processed for the legitimate interest of us or a third party.

In the event of an objection, we do not process the data further, unless there are proven legitimate reasons for processing, which outweigh your interests or rights and freedoms, or reasons for defending legal claims.

#### Recipients and processors of personal data

The Administrator notifies that third parties - subcontractors of the Administrator - also have limited access to certain personal data processed by the Administrator. The services of these subcontractors are unconditionally related to the successful performance of the contract and the provision of services. Subcontractors are obliged to comply with at least the same rules and obligations as the Administrator when processing personal data provided by the Administrator.

The following categories of subcontractors may have access to your personal data: providers of goods transport, accounting and tax consultancy, IT services and hosting, security, analytical services, payment gateways, legal services; public authorities.

#### Deadline for processing the application

The controller of personal data is obliged to process the data subject's request without undue delay and in any case within 30 days of receiving the request.

This period may be extended by a further two months if necessary and taking into account the complexity and number of applications. The controller is obliged to inform the data subject of such an extension within one month of receiving the request, together with the reasons for such postponement.

The controller does not have to provide the data subject with information about his / her processed personal data in a situation that the subject already has this information (eg it is published on the Administrator's website [www.smalt.cz](http://www.smalt.cz)).

#### Contact for exercising the rights of personal data subjects

You can contact the personal data controller:

- in writing at Údolní 410/60, Veveří, 602 00 Brno,
- by e-mail [smalt@smalt.com](mailto:smalt@smalt.com),
- or by phone on working days at +420 543 210 756.

You can also contact the Office for Personal Data Protection with a possible complaint in the area of processing and protection of personal data.