

## Notification of Personal Data Processing to Clients and Other Related Persons

### 1. Information on the controller

Tesil Fibres s.r.o., registration number: 28079761, legal address: Průmyslová 451, 391 02 Planá nad Lužnicí. Communication by telephone: +420 739 550 824 or e-mail address: info@tesil-fibres.eu

### 2. Contact details for communication on matters concerning the protection of personal data

Should you have any questions concerning this notification or processing of your personal data, please do not hesitate to contact us using the means of communication specified in Clause 1.

### 3. General characteristics of our personal data processing

This notification describes the procedure for processing the personal data of our clients, representatives/contact persons of our clients, cooperation partners, website visitors and other persons whose data could become available to us as part of our commercial activity.

We assume that, before using our website or becoming our client, you have read this notification and accepted the provisions of this notification. This is the latest version of the notification; we reserve the right to make amendments and/or update this notification from time to time.

The purpose of this notification is to provide some insight into the actions and intentions of personal data processing; however, please note that additional information on the processing of your personal data could be included also in other documents (e.g., service contracts, cooperation contracts, regulations on the use of the website or portal).

Please be informed that the provisions on personal data processing covered in this notification only apply to the processing of the personal data of natural persons.

Understanding the value of your personal data, we undertake to process your data in compliance with confidentiality requirements, while guaranteeing security of your personal data at our disposal.

#### **4. For what purpose we process your personal data and what is the legal basis for personal data processing?**

We will process your personal data only according to the pre-defined legitimate purposes, inter alia:

##### **Provision of services, as well as fulfilment of and compliance with contractual obligations**

For this purpose it might be necessary to identify you, to ensure appropriate payment calculation and payment settlement process, to contact you in matters related to the provision of a service and/or performance of a contract (including also for invoicing purposes) and in individual cases also to ensure the recovery of outstanding payments. For this purpose and the aforementioned auxiliary purposes, the following personal data could be necessary: given name, surname of the client, personal code, address (i.e., address of the object, invoicing address), phone number, e-mail address.

##### **The main applicable legal basis for the fulfilment of those purposes:**

- entering into a contract with the data subject and performance thereof (Article 6(1)(b) of the General Data Protection Regulation);
- compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation);
- legitimate interests pursued by the controller (Article 6(1)(f) of the General Data Protection Regulation), e.g., identification of you as the client, contact person of the client and/or cooperation partner, the ensuring of mutual communication.

##### **The main applicable legal basis for the fulfilment of those purposes:**

- compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).

##### **Implementation of marketing activities**

For this purpose it might be necessary to send you commercial communication, and also to publish materials from public events organised by us.

For this purpose at least the following personal data might be necessary: given name, surname, phone number, e-mail address.

The main applicable legal basis for the fulfilment of those purposes:

- consent given by the data subject (Article 6(1)(a) of the General Data Protection Regulation);
- entering into a contract with the data subject and performance thereof (Article 6(1)(b) of the General Data Protection Regulation);
- legitimate interests pursued by the controller (Article 6(1)(f) of the General Data Protection Regulation), e.g., to ensure communication.

**Elimination of the risk of security, proprietary interests and ensuring of other essential legitimate interests of ourselves or third parties**

For this purpose it might be necessary to perform video surveillance of our territory, buildings and other properties, to record telephone conversations, to use the means for personal data processing in order to ensure various functions, where necessary, to disclose information to national authorities, to exchange information within the group of companies, to exercise the right granted by laws and regulations for the purpose of ensuring own legitimate interests.

For this purpose it might be necessary to process at least the following personal data: given name, surname, personal code, address of the object, the number of residents declared at the address, appearance of a person (photo), location and time, as well as other relevant data.

The main applicable legal basis for the fulfilment of those purposes:

legitimate interests pursued by the controller (Article 6(1)(f) of the General Data Protection Regulation), e.g., for the purpose of the crime detection, for ensuring the recovery of debts.

**Adequate provision of services**

For this purpose we ensure the maintenance and upgrading of the technical system and IT infrastructure.

The main applicable legal basis for the fulfilment of those purposes:

legitimate interests pursued by the controller (Article 6(1)(f) of the General Data Protection Regulation)

**5. Who might have access to your personal data?**

We take appropriate measures to process your personal data in accordance with the applicable laws and regulations and to ensure that third parties without the relevant legal basis to process your personal data would not have access to your personal data.

**The following persons, when necessary, might have access to your personal data:**

- our staff or specifically authorised persons who require such access for the performance of their professional duties;
- personal data processors in accordance with the services provided and only to the extent necessary, e.g., auditors, financial and legal advisors, database developer/technical operator, other persons associated with the provision of the service of a controller;
- national and local authorities in the cases laid down in laws and regulations, e.g., law enforcement authorities, local authorities, tax administrations, sworn bailiffs;
- third parties after careful consideration whether such transfer of data has a legal basis, e.g., debt collectors, courts, extrajudicial dispute-resolution bodies, insolvency administrators, third parties responsible for the maintenance of registers (e.g., population register, debtor a.o. registers).

**6. What cooperation partners for personal data processing or personal data processors are selected by us?**

We take appropriate measures to ensure the processing of your personal data, protection and transfer thereof to data processors in accordance with the applicable laws and regulations. We select personal data processors with due care and upon data transfer we assess the necessity thereof and the scope of data to be transferred. Transfer of data to processors is carried out in compliance with the requirements for personal data confidentiality and secure processing of personal data.

Currently we are authorised to cooperate with the following categories of personal data processors:

- auditors, financial and legal advisors;
- IT infrastructure, database owner/developer/technical operator;
- other persons involved in ensuring the provision of our services.

The processors of personal data might change over time and in such case subsequent changes will be made in this document.

**7. Do we send your personal data outside the European Union (EU) or European Economic Area (EEA)?**

We do not transfer data to countries which are outside the European Union or European Economic Area.

## 8. For how long your personal data will be stored?

Your personal data will be stored as long as necessary for the purpose of the relevant personal data processing and also in accordance with the requirements laid down in laws and regulations.

In assessing the duration of personal data storage, we take into account the effective requirements laid down in laws and regulations, the aspects of fulfilling contractual obligations, your instructions, as well as our own legitimate interests. If your personal data are no longer required for the defined purposes, we will ensure the erasure or destruction thereof.

Please see below information on the most frequent personal data storage periods:

- personal data required for the fulfilment of contractual obligations — the data will be stored until the fulfilment of contractual obligations and other storage periods set in (see below);
- personal data which must be stored to comply with the requirements laid down in laws and regulations will be stored by taking into account the periods specified in the respective laws and regulations, e.g., according to the law On Accounting, source documents must be stored until the date they are necessary for establishing the start of each economic transaction and traceability thereof, but not less than 5 years;
- data necessary to prove the fulfilment of our obligations will be stored throughout the general limitation period for a claim in accordance with the limitation periods for claims laid down in laws and regulations — for 10 years according to the Civil Law, for 3 years according to the Commercial Law and other periods, taking into account the periods specified in the Civil Procedure Law for raising a claim.

## 9. What are your rights as a data subject with regard to the processing of your personal data?

### Updating of personal data

In the event of any changes in personal data you provided to us, e.g., changes in personal code, contact address, phone number or e-mail address, please contact us and provide the relevant data so that we could achieve the respective purpose of personal data processing.

### Your right to access your personal data and the right to rectification thereof

In accordance with the provisions of the General Data Protection Regulation you have the right

to access your personal data which are at our disposal, to request rectification, deletion, restriction of processing thereof, to object to processing of personal data and also the right to data portability in the cases and in accordance with the procedures laid down in the General Data Protection Regulation.

The company respects your right to access your personal data and to control them, therefore, upon receipt of your request, we will respond within the deadlines specified in laws and regulations (normally not later than within a month, unless this is a specific request which requires a longer period of time to prepare a response) and, if possible, we will accordingly either rectify or delete your personal data.

You can find more information on your personal data at our disposal or exercise any other right of a data subject in one of the following ways:

- by submitting the relevant application in person and by identifying yourself at our office (every working day from 08:00 to 16:00) or by sending the application by post to the following address: Průmyslová 451, 391 02 Planá nad Lužnicí.
- by submitting the relevant application, sending it to our e-mail address: [info@tesil-fibres.eu](mailto:info@tesil-fibres.eu), preferably attaching a secure electronic signature to the application.

Upon receipt of your application, we will examine the content thereof and the possibility to identify you in order to ensure the security of your data and disclosure thereof to the relevant person.

### **Withdrawal of consent**

If the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time and we will stop processing your personal data, which we processed on the basis of your consent, for the relevant purpose. However, please note that withdrawal of consent cannot be applied to the processing of such personal data which are necessary for compliance with the requirements laid down in laws and regulations or which is based on the contract, our legitimate interests or other reasons specified in laws and regulations for legitimate data processing.

## **10. Where to submit your complaints on matters related to personal data processing?**

Should you have any questions or objections in relation to the processing of your personal data, we kindly ask you first of all to address your request to us.

If you still believe that we failed to solve the problematic issue and you are convinced that we somehow have violated your rights to personal data protection, you have the right to submit a complaint to the relevant court of law in the Czech Republic, in accordance with applicable laws of the Czech Republic.

## **11. Why do you have to provide your personal data?**

Primarily we require your information for the fulfillment of contractual obligations, for the fulfillment of legal obligations binding upon us and for exercising our legitimate interests. For this reason obtaining of certain information is necessary for achieving the specific purpose in question and, therefore, failure to provide such information may undermine the start of a business relationship or the performance of a contract. If it is not a mandatory requirement to provide certain data, but the provision there of could help improve the service or offer attractive contractual conditions and/or offers, upon collecting data, we will indicate that the provision of such data is voluntary.

## **12. How do we obtain your personal data?**

We can obtain your personal data in one of the following ways:

- as a result of entering into a mutual contract, obtaining data from you;
- if a contract is entered into with a third party and you have been indicated as a contact person or user of the service by this party;
- from you if you have submitted any applications, sent any e-mails or made any phone calls;
- from you if you subscribe to our services online;
- from you upon entering authorisation data on the website [www.tesil-fibres.eu](http://www.tesil-fibres.eu);
- on the website [www.tesil-fibres.eu](http://www.tesil-fibres.eu), using cookies;
- in individual cases from the databases of third parties, e.g., when verifying your creditworthiness we can obtain data from third parties for this purpose;

## **13. Do we use your personal data in automated decision-making?**

We do not use your data in automated decision-making.