

## **INFORMATION ON PROCESSING OF PERSONAL DATA FOR PARTNERS AND ASSOCIATES OF TEDOM A.S.**

TEDOM a.s. always processes personal data in accordance with applicable legal regulations, i.e. EU regulation 2016/679 (General Regulation on Protection of Personal Data) (hereinafter referred to as "**Regulation**") and Act No. 110/2019 Coll. (Personal Data Processing Act) (hereinafter "**Act**").

This instruction applies to the processing of personal data of persons whose activities and cooperation are otherwise related to the activities of the Company, in particular business partners - natural persons and contact persons of business partners - legal and natural persons (statutory body, employees, etc.) (hereinafter "**Partners**").

### **Information on processing of personal data (Article 13 of the Regulation)**

#### **Personal data controller:**

TEDOM a.s., registered office no. 195, 674 01 Výchapy, company ID: 28466021 (also referred to as "**Company**"), telephone: +420 953 311 111, email: [tedom@tedom.com](mailto:tedom@tedom.com), website: <https://www.tedom.com>.

#### **Personal data protection officer**

The company does not have an obligation to appoint a personal data protection officer within the meaning of Article 37 of the Regulation. The Company does not name a personal data protection officer.

#### **Scope of personal data processed**

The Company processes the personal data provided by a Partner within the context of common business relations.

#### **Processed personal data may include, in particular:**

- a) Common personal data:
  - i. Identification and contact details of the Partner (name and surname, position / function, or designation of the person represented, e-mail address, telephone number, etc.)

#### **Purpose of processing personal data and legal basis for processing**

Personal purposes are processed for the reason of communication in the Company's ordinary business activities, particularly in the course of performance of the Company's orders, and the related internal agenda administration of the Company (particularly regarding the protection of the Company's rights). For this purpose, the personal data will be processed in particular within:

- a) Communication within the Company's ordinary business activities, in particular in the course of performing the orders of the Company (the Partner is a contract party of the Company);

In order to perform the contract or implement a pre-contractual arrangement at the request of the Partner (Article 6 (1) (b) of the Regulation);

- b) Communication within the Company's ordinary business activities, in particular in the course of performing the orders of the Company (the Partner is a representative (employee, statutory body etc.) of a contract party of a contract with the Company);
- c) Protection of the Company's legal claims (in particular, to give an evidence of compliance with the Company's obligations towards the Partner or the person he represents)
- d) Direct marketing activities of the Company – depending on the circumstances, sending of sales offers and/or information materials (novelties) of the Company

due to a legitimate interest of the Company or other persons within the meaning and under the terms of Article 6 (1) (f) of the Regulation.

With a prior consent of the Partner (Article 6 (1) (a) of the Regulation), some of the Partners' personal data, such as name and surname, position / function, or designation of the person he represents, may also be used for the purposes of public presentation and marketing activities of the Company's or other special purposes.

#### **Sources of personal data**

Processed personal data acquired by the Company from Partners within the ordinary business activities of the Company, particularly in the course of arranging and performing the Company's order.

#### **Withdrawal of consent with processing of personal data**

For cases where the personal data are processed on the basis of a granted consent, granting a consent is always considered voluntary and the Partner has the right to withdraw his/her consent at any time, wholly or in part. The consent can be withdrawn by a written notice sent to the registered office of the Company or to its email address as mentioned above.

From the date when the withdrawal of the consent is notified to the Company, the Company shall process the personal data only to the extent which is proven by another legal reason for the processing, i.e., in particular in the course of the performance of the contract or its signing with the Partner, or for the purpose of protecting rights and legal claims as described above.

#### **Disclosure of data to other persons**

The personal data may also be disclosed to entities authorized under special legal regulations (e.g. law enforcement authorities, etc.) and persons in the position of personal data processors working for the Company with whom the Company shall cooperate.

With a specific prior consent of the Partner, the personal information may also be disclosed to other persons or public, in connection with the public presentation and marketing activities of the Company.

#### **Personal data keeping time**

The personal data shall be processed and kept with the Company for as long as legal grounds for the processing of personal data are in force unless otherwise provided by applicable law regulations (e.g. for the purpose of archiving tax documents, etc.)

#### **Other information on rights in relation to processing of personal data**

The individuals - data subjects whose personal data are processed by the Company are granted by the Act and the Regulation, in addition to the rights already mentioned above, in particular the rights summarized below. The Company strives to accommodate the data subjects when fulfilling these rights of them as much of possible.

Right of access to personal data pursuant to Section 28 of the Act: The company shall, at the data subject request, state whether it processes personal data relating to his or her person. If the Company processes such data, the Company is obliged to hand him/her over the personal data and information pursuant to Section 28 (1) of the Act) without undue delay.

The protection of rights under Section 49 of the Act: Any data subject who considers that the controller or processor carries out the processing of his/her personal data contrary to the protection of the private and personal life of the subject or contrary to law, in particular if the personal data are inaccurate with regard to the purpose of their processing, the subject may:

- a) ask the controller or processor for an explanation or
- b) request that the controller or processor removes the resulting condition (in particular by correcting, completing, or deleting the personal data).

**According to the Regulation, the data subject has in particular the following rights**

Right of access to personal data: The data subject has the right to obtain from the Company a confirmation that his/her personal data are being processed and, if so, he/she has the right to access this personal data.

Right to repair or delete or limitation of processing: The data subject has the right (in the cases specified by the Regulation) to request the Company to correct or complete incorrect or incomplete personal data, to request the deletion of the personal data if the reason for their processing is terminated or is not given, or to request a limitation of the processing of personal data in connection with solving the circumstances of the processing of personal data at the Company.

Right to object: The data subject has the right to object to the Company to the processing of his/her personal data processed for legitimate interests of the Company or other persons (according to the Regulation) due to reasons related to his/her specific condition at any time.

Right to data portability: The data subject has (under the conditions stipulated in the Regulation) the right to obtain his/her personal data from the Company and pass it on to another personal data controller.

Right to file a complaint with supervisory authority: The data subject has the right to file a complaint with the supervisory authority if he/she considers that the processing of his/her personal data has violated the Regulation. This supervisory authority for the data subjects residing in the Czech Republic shall be the Office for Personal Data Protection.

If you have any questions or if anything is unclear about the above-mentioned information, please do not hesitate to contact us, we will be happy to answer you.