

## **DECLARATION ON THE PROCESSING OF PERSONAL DATA**

Declaration on the processing of personal data pursuant to 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 and pursuant to Act No. 110/2019 Coll., on the processing of personal data, as amended (hereinafter referred to as the "Regulation")

- 1) Personal data controller: PROGRESUS Group a.s., ID No.: 10978216, with its registered seat at Václavské náměstí 2132/47, Nové Město, 110 00 Prague 1, registered in the Commercial Register maintained by the Municipal Court in Prague, Section B, Insert 26471 (hereinafter referred to as the "Controller"). In accordance with Article 12 of the Regulation, the Controller hereby informs you about the processing of your personal data and your rights.
- 2) Extent of personal data processing: personal data are processed to the extent that the relevant data subject has provided them to the Controller, in relation to the concluded contractual or other legal relationship with the Controller, or which the Controller has collected otherwise and processes in compliance with applicable law or to fulfil the Controller's legal obligations.
- 3) Sources of personal data:
  - a) directly from data subjects (emails, phone, websites, web contact forms, business cards, etc.)
  - b) publicly accessible registers, lists and records (e.g. commercial register, trade register, cadastre of real estate, etc.) for the purpose of producing accounting documents and checking the accuracy of information
  - c) from third parties in connection with the activities of the Controller
- 4) Categories of personal data subject to processing:
  - a) identification data used for unambiguous and unmistakable identification of the data subject (e.g. name, surname, title, birth number (or similar identifier), date of birth, permanent residency address, company identification number, VAT number) and data enabling contact with the data subject (contact data - e.g. contact address, telephone number, e-mail address and other similar information)
  - b) descriptive data (e.g. bank details)
  - c) other data necessary for the performance of the contract
  - d) data provided beyond the scope of the applicable laws and regulations and processed within the scope of the data subject's consent (processing of photographs, use of personal data for the purpose of personnel management, for the purpose of sending business communications or information notices, etc.)
- 5) Categories of data subjects:
  - a) client and potential client of the Controller
  - b) an employee of the Controller
  - c) service provider and potential service provider
  - d) another person that is in a contractual relationship with the Controller
  - e) a job applicant

- 6) Categories of personal data recipients - the Controller does not intend to transfer personal data to a third country outside the EU; the Controller has the right to entrust the processing of personal data to a processor who has concluded a processing contract with the Controller and who provides sufficient guarantees for the protection of personal data. Otherwise, data subjects will be informed of the transfer without reservation. The categories of recipients are therefore:
  - a) financial institutions
  - b) processor
  - c) state and other authorities in the context of fulfilling the legal obligations set out in the relevant legislation
- 7) The purpose of personal data processing:
  - a) specific purposes within the scope of the data subject's consent (e.g. marketing purposes)
  - b) negotiation of a contractual relationship
  - c) performance of a contract
  - d) protection of the rights of the Controller, the recipient or other persons concerned
  - e) archival purposes carried out on the basis of the law
  - f) selection procedures for advertised employment positions
  - g) compliance with legal obligations of the Controller
  - h) protection of the vital interests of the data subject
  - i) transmission of commercial communications or other information in the case of legitimate interests pursued by the Controller
- 8) Means of processing and protection of personal data - processing of personal data is carried out by the Controller. The processing is carried out at the Controller's premises, branches and headquarters by individual authorised employees of the Controller or by the processor. The processing is carried out in compliance with all security principles for the management and processing of personal data. For this purpose, the Controller has taken technical, organisational and legal measures to ensure the protection of personal data, in particular measures to prevent unauthorised or accidental access to personal data, their alteration, destruction or loss, unauthorised transfers, unauthorised processing or other misuse of personal data. All subjects to which personal data may be disclosed shall respect the right of data subjects to the protection of their privacy and freedoms and shall comply with applicable data protection legislation.
- 9) Duration of personal data processing - in accordance with time limits set out in the relevant contracts, information documents and consents, and time limits set out in the case of legitimate interests of the Controller or a third party by the relevant legal regulations, the duration which is necessary to ensure the rights and obligations arising from both the contractual relationship and the relevant legislation.
- 10) Notification - The Controller processes personal data with the consent of the data subject, with the exception of cases set out by law when the processing of personal data does not require the consent of the data subject, i.e. when there is another legal basis for the processing. In accordance

with Article 6(1) of the Regulation, the Controller may process the personal data without the data subject's consent:

- a) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- b) processing is necessary for compliance with a legal obligation to which the Controller is subject;
- c) processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- d) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller;
- e) processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data

11) Rights of the data subject:

- a) The data subject has the right to obtain a confirmation from the Controller as to whether or not personal data concerning them are being processed. If they are processed, the data subject has the right to obtain access to those personal data and to the following information:
  - i) the purposes of the processing of personal data,
  - ii) the categories of personal data concerned,
  - iii) the recipients or categories of recipients, to whom personal data have been or will be disclosed,
  - iv) the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
  - v) the existence of the right to request from the Controller rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing,
  - vi) the right to lodge a complaint with a supervisory authority,
  - vii) where the personal data are not collected from the data subject, any available information about their source,
  - viii) the existence of automated decision-making, including profiling.
- b) The data subject has the right to obtain a copy of the personal data undergoing processing. For second and any further copies requested by the data subject, the Controller may charge a reasonable fee based on administrative costs..

12) In the event that the Controller becomes aware of a security risk related to personal data, it will notify the potentially affected data subject about such risk without undue delay.

13) Any data subject who becomes aware or believes that the Controller or processor is carrying out processing of their personal data in violation with the protection of the data subject's private and

personal life or contrary to law, in particular if the personal data are inaccurate with regard to the purpose of their processing, may:

- a) ask the Controller for an explanation;
  - b) request information about the extent or means of processing the personal data of the data subject;
  - c) request information about which processors process personal data concerning them for the Controller;
  - d) request that Controller remedies the violation; in particular, this may involve blocking, rectifying, supplementing or erasing the personal data.
- 14) If the data subject's request pursuant to paragraph 13(d) is found to be justified, the Controller shall remedy the violation without delay. If the Controller does not comply with the data subject's request pursuant to paragraph 13(d), the data subject has the right to apply directly to the supervisory authority, i.e. the Personal Data Protection Office. The procedure referred to in point (d) of paragraph 13 does not prevent the data subject from making a complaint directly to the supervisory authority.
- 15) The data subject has the right to withdraw the consent with the processing of their personal data that was previously given to the Controller.
- 16) The data subject has the right to request that Controller rectifies or erases personal data concerning them or restricts their processing and the right to data portability, if technically feasible. The data subject also has the right to object to the processing of personal data.
- 17) The Controller ensures that the above principles are consistent with other principles applied within its group.
- 18) Contact person for the processing and protection of personal data: Ing. Jan Nový, phone number: +420 604 744 047, email: [novy@progresus.cz](mailto:novy@progresus.cz).

In Prague on 21. 11. 2023