

Information Memorandum on Personal Data Processing

The controller of personal data – **Plastkon product s.r.o.** informs you that it oversees the protection of your personal data, and undertakes to protect the data in accordance with transparency principles, ethical information procedures and applicable laws to protect personal data, including the General Data Protection Regulation (hereinafter GDPR).

Our aim is to ensure the maximum protection of your personal data in its processing. Whether you have entrusted us with your personal data based on the performance of our activity, contract, or consent, or whether we have obtained the data under a law that requires the aforementioned from us, our approach to data protection honours the same rules:

- 1) Minimize its necessary extent,
- 2) Protect it and control access to it,
- 3) Delete it once it is no longer up-to-date and necessary.

Defining our specific principles and procedures in personal data processing

This document explains the method of collecting and using personal data in the **controller's environment**.

Personal data is any information concerning the identified or identifiable natural person, i.e. a person who can be identified directly or indirectly by reference to an identifier, such as name, identification number, location data, online identifier, or reference to one or more factors specific for the physical, physiological, genetic, intellectual, economic, cultural or social identity of the respective individual.

We collect personal data during our activities in different ways. Data collection takes place in the course of our main business activity, or when purchasing goods or services, entering into contracts or communicating with citizens and other entities, or visiting and using our website.

Information about the personal data controller:

Plastkon product s.r.o.

Hlavní 147, 790 84 Mikulovice
Identification No.: 633 21 289
VAT Number: CZ 633 21 289

In the case of a request to satisfy your rights in the field of personal data protection, please use any of the contacts provided below:

- E-mail address: gdpr@plastkon.cz
- Data box ID: 58etkdt
- In person at the address: Hlavní 147, 790 84 Mikulovice

Principles for the receipt of applications:

- 1) Receipt of applications is carried out exclusively based on unambiguous identification of the data subject (identification), i.e. by filing an application:
 - a) Through the data box of the data subject,
 - b) By filing an application with an officially authenticated signature of the data subject,
 - c) Verification of the applicant's identity by submitting the citizen's ID card in the case of filing an application in person.

- 2) In the case of submitting the application in person, the mail office shall identify the data subject according to their citizen's ID card, and shall record the applicant's data to the extent of name, surname, permanent address and date of birth.

In the case of an application filed through the data subject's data box, an application signed with a recognized electronic signature based on a qualified certificate of the data subject filed by e-mail, or an application affixed with the officially verified signature of the data subject submitted remotely by for example the Czech Post, it shall be understood that the act of filing the application has been performed by the data subject itself, and the submission made in the aforementioned manner is considered as sufficiently verified.

- 2) It must be clear from the application that the application is addressed to the controller, i.e. Plastkon product s.r.o., and that the applicant seeks to exercise the data subject's rights pursuant to GDPR.

Pursuant to the REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

of 27 April 2016 on the protection of natural persons 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), we call your attention to the following information:

Information about the purposes of personal data processing:

We process the personal data for the following purposes.

- Performance of obligations within the field of activities of Plastkon product s.r.o. including provision of information;
- Performance of obligations in labour law relationship with employees in the company;
- Administration of our contractual obligations and the pending contractual relationship including negotiations with the contracting parties;
- Ensuring security of our website, networks, systems and areas as well as protection of the **company** against fraud and in judicial disputes;
- Management of our daily business needs, such as payment processing and financial account management, contracts management, website management, records management, audit, control, reporting and compliance.

Categories of the affected personal data:

The personal data we may collect and process includes, among others:

- Address-related and identification data
- Data we are obliged to process according to law
- Information you provide us during communication with us

The aforementioned includes for example:

Name, surname, residential address; signature; birth registration number; e-mail, telephone number.

Personal data recipients:

- According to legal requirements:
 - We may make personal information about individuals accessible to the public and judicial authorities, law enforcement authorities and agencies, to the extent required by law. In the cases where it is legally permissible, we may also provide this data to third parties if necessary to prove, enforce or protect legal claims;
- Third parties: All processing of such personal data will be according to our instructions, and will be in accordance with the original purposes.

Period planned for storage of personal data:

Personal data will be retained only for the time required for the purposes for which it was collected, usually for a period of time determined by Czech legislature or set out by your consent.

Legal basis for the processing of personal data:

Your personal data processing is always carried out based on a legal basis, notably:

- Processing necessary to perform the legal obligations of the controller.
- Processing necessary to perform a contract, to which the data subject is a party, or to implement the measures taken prior to the conclusion of the contract upon request of the data subject;
- Granting the data subject's consent to processing of their personal data for one or more specific purposes;
- Processing necessary to protect the vital interests of the data subject or any other natural person;
- Processing necessary to fulfil a task carried out in the public interest or in exercising public authority, entrusted to the controller;
- Processing necessary for the purposes of the legitimate interests of the respective controller or any third party, except where the interests or fundamental rights and freedoms of the data subject requiring the personal data protection prevail over those interests, in particular where the data subject is a child;

Personal data protection:

Safety measures to protect the personal data:

We apply the appropriate technical, physical and organizational measures that are reasonably designed to ensure personal data protection against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access and other forms of illegal processing. Access to personal data is restricted to the authorized recipients who need to know the information. We maintain a comprehensive information security system, the extent of which is adequate to the risks associated with data processing. This system is constantly adapted to minimize the operational risks and to protect personal data, taking into account the procedures applied. We also apply enhanced security measures when processing any sensitive personal data.

Information about our website:

Cookies, data utilisation and similar tools:

- When visiting our website, we can automatically collect certain information using technologies such as cookies, internet browser analysis tools, and server protocols. In many cases, the information collected through cookies and other tools is used in an unidentifiable manner without any reference to the personal data.
- Cookies are small text files that a website saves during your visit through a browser on a computer's hard disk or other device. We can use cookies to make the use of our website more effective, as well as to adapt to your browsing preferences and to enhance the functionality of our website. Cookies can be used to manage performance and gather information about how our website is used for analytical purposes. There are two kinds of cookies: session cookies that are removed from your device when you leave the website, and persistent cookies that remain on your device for a longer time, or until you manually delete them.
- The log files from our servers can be used to collect information about how users are using a website (usage data). Such data includes, but is not limited to, the user's domain name, language, browser type and operating system, internet services provider, IP address (internet protocol), site or link from which the user arrived to the website, the website you visited before visiting our website, and the website you visit after leaving our website, as well as the time spent on our website. We may monitor and use the website usage data to evaluate the website's performance and operation, to improve its design and functionality, or for security purposes.
- You can change your internet browser settings to block the received cookies, to notify you of their receipt, or to delete them. Alternatively, you can browse through our website using an anonymous browser profile. For more information about modifying or changing your browser settings, please refer to the browser manual or help. If you do not agree with the use of cookies or similar technologies that store information about your device, you have to change your browser settings accordingly. Please note that some features of our website may not work properly if you disable cookies or the aforementioned technologies.

Linked websites:

- We may provide links to third-party websites on our website ("linked websites"). We are not obliged to evaluate, control or examine the linked websites. Each linked website may have its own terms of use and statement on the protection of personal data. When using linked websites, users have to become familiarised with such terms and observe them. We assume no responsibility for the principles and procedures of any linked websites and possible other links existing on such websites. Such links do not represent our approval of the linked websites or any company or service. We recommend the users to become familiarised with the terms and the corresponding documents of such linked websites before they start using them.

Information about the existence of your rights:

You have the right to address us in relevant cases and to the extent permissible according to the applicable law, for the purpose of exercising the right to:

- Access the personal data;
- Correct or update inaccurate or outdated personal data;
- Deletion, if the personal data is processed contrary to the protection defined by the applicable legislation or contrary to the granted consent, or if the consent is revoked;
- Restrict the processing of personal data;
- Object to the processing of personal data;
- Transferability of data;

and other rights according to the general data protection regulation. You also have the right to address us in the case of data processed based on the consent for the purpose of revoking the consent to process personal data.

You may exercise your rights according to the aforementioned **Information about personal data controller** and the **Principles for receiving applications**.

You may exercise your rights for free within 30 days after filing the application.

You also have the right to file an objection with the Supervisory Authority, which is the Office for Personal Data Protection (<https://www.uoou.cz/>).

Consent and its revocation

By knowingly providing your personal data, you acknowledge and agree to the collecting, processing and using such data, within the meaning as defined herein.

Where required by the applicable law, you will be asked for an explicit consent.

You always have the opportunity to file an objection to the use of your personal data or to revoke any prior consent granted for a particular purpose, free of charge .

Information about automated decision making and profiling performed in personal data processing:

We do not perform automated decision making and profiling.

Information about transfer of personal data to a third country or to an international organisation

We do not transfer the personal data to any third country or international organisation.

Final notice:**Concerning the possibility of altering the document titled Information memorandum of personal data processing:**

We reserve the right to make changes, modifications and updates to this document at any time. Please check regularly to ensure that you are using the latest version of this document.

Effective date of this document: 25 May 2018