

Principles of personal data processing

Under provisions of articles 12 to 14 of Regulation of the European Parliament and of the Council No. 2016/679 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, or “GDPR” from now on)

Company **Adbros s.r.o.**, Reg. No.: 27677338, with registered office Srbská 2741/53, Královo Pole, 612 00 Brno, registered in the commercial register of the Brno County court, file number C 51283 (hereinafter „Adbros“), hereby informs you as a customer, supplier or visitor of its website about how it will deal with your personal data.

1. Adbros as administrator of personal data

In relation to the processing of personal data, Adbros is **the administrator of your personal data** in accordance with the GDPR and Act No. 110/2019 Coll., on the processing of personal data. The administrator determines the means and purposes of the processing of personal data, thus decides on how the processing of personal data will take place and bears full responsibility for the processing of personal data that it carries out.

Personal data is any information about an identified or identifiable natural person (data subject); for example, name, surname, one or more special elements of the physical, physiological, genetic, psychological, economic, cultural or social identity of this natural person.

Personal data of special category is personal data indicating racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person and data on a natural person's state of health or sex life or sexual orientation.

Data subjects are mainly visitors of website www.adbros.cz, or other persons who share their personal data with Adbros.

Processing of personal data is any operation or set of operations with personal data or sets of personal data that is carried out with or without the aid of automated procedures such as collection, recording, arrangement, structuring, storage, adaptation or alteration, retrieval, inspection, use, disclosure by transmission, dissemination or any other disclosure, arrangement or combination, restriction, erasure or destruction.

2. We comply with the basic principles of personal data processing according to the GDPR

If we handle personal data, we always respect the basic principles, i.e.:

A. Principle of lawfulness, fairness and transparency

- We do not process personal data just like that, we always have a reason (legal title) for processing
- we do not hide processing methods because we believe that data subjects have the right to know what is happening with their personal data
- our procedures are fair, we act as we would want other administrators to treat our personal data

B. Principle of limited purpose

- we do not combine processing purposes unless the data subject expressly wishes to do so

C. Principle of data minimization

- we process only the data we truly need
- during processing we check if we miss any personal data, or we have more than we need

D. Principle of accuracy

- if we want to provide quality services, inaccurate data will not work for us
- we always try to ensure that all data corresponds to reality

E. Principle of deposit limitation

- we do not keep personal data forever, but only for the necessary storage period
- if we no longer need personal data, we erase them

F. Principle of integrity and confidentiality

- we ensure processing both organizationally (we carefully maintain paper documentation and secure our premises) and technically (we ensure adequate IT security of computers and the network)

3. What personal data do we process?

Based on our experience we **process mainly these personal data**:

- identification data (name and surname or company name, identification number and tax identification number),
- contact information (e-mail address, postal address, telephone number),
- payment or bank details,
- other data related to fulfillment of the contract or other duties.

4. For what purpose do we process your data and what legal title do we have to do it?

We may process your personal data for the purpose of **concluding a contract and its subsequent fulfillment**. In such a case, the processing of personal data of the data subject (customer, supplier) is necessary for the fulfillment of the contract to which the data subject is a party, or for the implementation of measures taken prior to the conclusion of the contract at the request of this data subject. This constitutes a legal title for processing according to Article 6 paragraph 1 letter b) GDPR.

When concluding a contract, the provision of personal data may be a **contractual as well as a legal requirement** (with respect to tax and accounting legislation). The provision of personal data in connection with the conclusion of a contractual obligation is therefore a necessary requirement for the establishment of a specific legal relationship and the fulfillment of the rights and obligations arising from it. Without providing personal data for these purposes, a contractual obligation cannot be concluded.

Another purpose of processing may be **the fulfillment of a legal obligation** that applies to **Adbros**. It can typically be obligations under Act No. 89/2012 Coll., Civil Code, as amended, Act No. 563/1991 Coll., on accounting, as amended, Act No. 280/2009 Coll., tax code, as amended. The fulfillment of a legal obligation is the legal title for the processing of personal data according to Article 6 paragraph 1 letter c) GDPR.

In some cases, we may also process personal data within the scope of our **legitimate interest**. However, this interest never takes precedence over the interests and fundamental rights of the data subject requiring the protection of personal data. Legitimate interest is a legal title for us according to Article 6 paragraph 1 letter f) GDPR, especially in situations where we protect our property, our economic interests and our good reputation, if we need to start and conduct court or arbitration proceedings, or when we ensure the security of the website www.adbros.cz.

Also, if you **contact us via the contact form** on the website www.adbros.cz, your personal data (name, surname, e-mail address, or other personal data mentioned in the message) will be used primarily for further communication and processing of your request.

5. How do we carry out personal data processing operations?

We process personal data **both manually and automatically**. We do not perform profiling or automated decision making.

6. Who will have access to your data and for how long we will process it?

Adbros employees primarily work with your personal data. We do our best to protect your personal data from misuse or unauthorized use.

In the event of compliance with a **legal obligation**, we may share your personal data with public authorities. If we were to seek the protection of our legal interests, we may share your personal data with a legal representative.

In connection with the processing of personal data in the contact form, our contractual partners (processors) in third countries (in the USA) may in exceptional cases have access to your personal data that you provide in this way. However, we have taken all measures (SSC and other contractual obligations) to meet all the obligations that this entails for us. Otherwise, we do not intend to transfer personal data outside the EU or international organizations.

We **store personal data in accordance with the deadlines established by the relevant legal regulations**, or for a period that is necessary with regard to the purpose for which the personal data is processed. It is generally **3 years**.

We store the personal data we obtain from the contact form for a period of one month. We can keep it longer if there is another legal title for processing (e.g. conclusion of a contract).

7. Where can you learn more information about how we process personal data?

The role of **data protection officer** for Adbros is delivered by company **LAWYA, s.r.o.**, Identification Number: 02322021, with address Březinova 746/29, 616 00 Brno, through **Mgr. Ivana Šilhánková, poverenec@lawya.cz**, +420 770 606 082, who you can contact with questions.

8. What are your rights?

Please note that you have the option to exercise the following rights:

A. Right of access to your personal data

Based on your request, we will inform you whether we are processing your personal data or other information that you will request from us. You can request information about what data and how we process it, from which source it comes, etc. In the GDPR, this right is enshrined in Article 15, where you will also find a complete list of information that you can request in your request for access.

B. Right to correct personal data

The personal data we process should always be correct and correspond to reality. If you find that the personal data we process about you is incorrect, you can ask us to correct it (within our technical capabilities). This right is based on Article 16 GDPR.

C. Right to erasure ('right to be forgotten')

You can also ask us to erase your personal data which we no longer need. However, we can only accommodate your request if we no longer really need to process personal data. Thus, we cannot delete personal data, for example, if the statutory archiving period for certain documents is running, etc. However, we will of course explain this to you in response to your request. In the GDPR, you can find this right under Article 17.

D. Right to restriction of processing

Based on your request, we will limit the processing of personal data regarding which a problem or a certain dispute has arisen – for example, whether the personal data is accurate, whether the processing is illegal, etc. This right is enshrined in Article 18 of the GDPR.

E. Right to object to the processing of your personal data at any time

You can raise an objection if you do not agree with the processing of your personal data with regard to our legitimate interest. Our task will then be to prove a legitimate interest. If we fail to do so, we will stop processing personal data.

F. Right to data portability

If we process your personal data in electronic form, you can ask us to transfer them to another administrator. If it is possible in a specific case, we will transfer your personal data based on your request.

If you decide to exercise any of the above rights, please contact our data protection officer at the email address poverenec@lawya.cz, or call +420 770 606 082. We can provide information about the processing of personal data only to the person to whom the personal data relates to; therefore, we must first verify whether the person

to whom the personal data processed by us relates to is requesting the exercise of their rights. We will process the data request free of charge within thirty days. If the request is complex, we can extend the deadline by sixty days. If the requests are repeated or unreasonable, a fee may be requested. However, we always inform the data subject about this in advance.

Supervision of compliance with the rights and obligations arising from the GDPR and the Personal Data Processing Act is the responsibility of The Office for Personal Data Protection, address Pplk. Sochora 27, 170 00 Praha 7, Identification Number: 70837627. You can address the Office with any complaint via e-mail posta@uouu.cz or data box: qkbaa2n. You can learn more about the supervisory role of the Office mainly from its website www.uouu.cz/en.

9. Will we change these principles?

We might eventually change these principles if our purpose of use or our tools for processing of personal data change. The current version of principles will always be available on the website www.adbros.cz.

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