

INFORMATION ON PROCESSING OF PERSONAL DATA BY THE COMPANY PREOL, a.s.

PREOL, a.s. seated at Lovosice, Terežínská 1214, post code 410 02, identification No.: **26311208**, registered in the Commercial Register of the Regional Court in Ústí nad Labem, Section B, Insert 1729 (hereinafter referred to as "**PREOL**" or "**our company**") is the data controller of your personal data, which means that it determines the purpose and means of processing of your personal data, performs processing of your personal data and bears responsibility for this processing.

In this document, you will find general information on processing of personal data by our company and further information about some of the most common ways of processing of personal data occurring during operation of the company PREOL, a.s. and on personal data that the company processes in accordance with regulations governing protection of personal data, especially the EU Regulation no. 2016/679 (hereinafter referred to as the "Regulation").

You can find below:

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Our company carries out other processing of personal data as well, but notifications on such processing is only sent to the affected persons individually.

- I. GENERAL INFORMATION REGARDING THE PROCESSING OF PERSONAL DATA BY THE COMPANY PREOL**

Principles of Processing of Personal Data

In processing, we respect all the rights of data subjects, following these principles in particular:

- personal data is processed in a correct, legal and transparent manner;
- collecting personal data is done solely for legitimate purposes and any processing is done in a manner that is compatible with these purposes;
- when processing personal data, our company limits its activities to the minimum necessary to fulfill the stated purposes;
- to safeguard personal data during processing thereof, we take all reasonable and affordable measures to protect the data;
- only accurate and updated personal data is processed; inaccurate or redundant data is being corrected or deleted;
- personal data is kept for as long as is necessary for purposes for which the data is processed;
- processing of personal data takes place only in such a way as to ensure proper security of the personal data, including the protection thereof by appropriate technical and organizational measures against unauthorized or unlawful loss, destruction or damage.

What personal data do we process?

For the purposes set out above, the following categories of personal data are processed in particular:

- identity and address details: name, surname, title, date of birth, address (address of residence, delivery address or another contact address), for a natural person-entrepreneur also the business name or addendum attached to the name, business address and ID number;
- electronic contact details: telephone number, mobile phone number, fax number, e-mail address, data box ID;
- other electronic data: IP address, location data, data transmitted from the customer's internet browser, etc.;
- other personal data needed to perform the contract: bank account number, invoiced amount, etc.;
- information on creditworthiness and credibility: records on the fulfillment of payment obligations, including information from public registers.

How do we get your personal information?

We obtain your personal data from you, from third parties, from publicly available sources, or from your own activities. If we obtain personal data from you, we will always inform you if provision of your personal data is based on a legal or contractual requirement and whether you are required to provide personal data and about the possible consequences of not providing your personal data.

- from you, in particular:
 - on the basis of your requests and in the negotiation of a contract;
 - in telephone communications;
 - in personal or written communication with you, including communication by electronic means (by e-mail).
- from third parties, in particular:
 - from state administration bodies or from third parties in fulfilling our legal obligations or under special legal regulations;
 - from collaborating third parties.
 - from publicly available sources, in particular:
 - from social networks and the Internet, if you publish the data yourself;
 - from the Commercial Register;
 - from the insolvency register.
 - from our own activities:
 - assessing the information you provide to us regarding the use of our products or services

For what purposes will your personal data be processed?

Your personal data will only be processed to the extent necessary for the given purpose and for the time necessary to fulfill the purpose. Once the purpose is met, we may process your personal data for purposes other than those for which it was collected. We also always inform you of these other purposes.

We process your personal data especially:

- a) For the purpose of complying with contracts, for the purposes of performing the contract we have entered into with you and for handling your requests,
- b) For the purpose of fulfilling our legal obligations,
- c) For the purposes of defending our legitimate interests,
- d) For marketing purposes.

How do you process your personal data and how is the personal data secured?

When processing personal data, our company always proceeds so that your personal data is handled securely and cannot be misused.

Processing of your personal data can be both manual and automated. Automated processing takes place in information systems of PREOL or in the information systems of our processors.

Your personal data is primarily processed by those employees of PREOL who are required to have access thereto for the performance of their work-related duties and who are committed to maintaining confidentiality regarding all the facts and information they learn in the course of their work. Additionally, also employees of our processors have access to your personal data, but only to the extent necessary to their render services for our company. We always sign a written agreement on processing of personal data with all our processors; the agreement contains security guarantees for your personal data.

What are your rights?

At any time during processing of your personal data, you can enforce the following rights:

- the **right to access** your personal data and to make a copy of personal data which we process,
- the **right to repair and addition** to your personal data if you find that we process incorrect or inaccurate personal data of yours,
- the **right to delete** your personal data if the conditions laid down by law are met,
- the **right to restrict processing** of your personal data when we may limit the handling of personal data at your request under certain legal regulations under specified conditions,
- the **right to transferability** to another controller if we process your personal data with your consent or for the purpose of fulfilling a contract provided the processing is automated,
- the **right to object to processing** of personal data if the personal data is processed for purposes of legitimate interests of our company. In the event that you object, we will not process your personal data until we have substantive grounds for processing that prevail over your interests or rights and freedoms or for the determination, exercise or defense of legal claims. In the case of processing of personal data for the offer of our products and services, processing of your personal data for these purposes will be terminated after the objection without any delay.

If we receive an application or a claim raising your rights described above, we will inform the applicant on the measures taken without undue delay, in any case within one month of receipt of the application. This deadline can be extended by another two months if necessary and in view of the complexity and number of applications. In certain cases laid down by the Regulation, our company is not obliged to comply with the request in whole or in part. This will be the case in particular if the application is clearly unreasonable or disproportionate, in particular because it is repetitive. In such cases, we may (i) impose a reasonable fee, considering the administrative costs associated with providing the required information or communication or bill you the costs of the requested activities, or (ii) refuse to comply with the request.

If we receive the above request but we have reasonable doubt as to the identity of the applicant, we may ask him / her to provide additional information necessary to confirm his / her identity.

Information on how a data subject has exercised their rights and how we have dealt with his or her claim will be stored for a reasonable period (usually 3-4 years) to document this fact, for statistical purposes, to improve our services and to protect our rights.

In case the data subject believes that PREOL handles his or her personal data unjustifiably or otherwise violates their rights, they have the right to file a complaint with the Supervisory

Authority (the Office for Personal Data Protection, Pplk Sochora 27, 170 00 Praha 7) or have the right to request judicial protection.

We would also like to inform you that we do not make any decision based solely on automated processing of your data (including profiling) which would have legal effects on you.

II. NOTE ON PERSONAL DATA PROCESSING FOR CONTRACTUAL PARTNERS OF PREOL

(a separate document)

III. NOTE ON PERSONAL DATA PROCESSING FOR CONTACT PERSONS OF BUSINESS PARTNERS OF PREOL

Within the processing of personal data of current or potential business partners, PREOL also processes data on their contact persons (e.g. their statutory bodies or employees who deal with PREOL). Within the data, processing usually covers information on the name and surname of such persons, their e-mail address, job position, their telephone number and, where applicable, the minutes of meetings with them. The data is for the same purposes and collected to the same extent and with a similar duration of storage as applies to the data of our contractual partners. Individual employees of PREOL can keep their own contact lists, for example in their phone directories or business card catalogs. Phone numbers that have been called or received calls from corporate devices are also stored for a reasonable period to properly charge telecommunication services, protect the rights of PREOL, and distinguish between private and business calls. However, access to such data is provided by the system administrators only to the employees whose communication devices were used in the calls.

IV. NOTE ON PROCESSING OF PERSONAL DATA OF JOBSEEKERS

This document summarizes the principles of processing personal data of job seekers interested in employment with the company PREOL. In relation to job seekers in PREOL, the company PREOL operates as a Data Controller.

What data will we process in relation to you?

We will process your personal data that you submit or agree to hand over to us, for example the data on information sharing servers (typically the data contained in your CV, i.e. your name and surname and contact details, information on your previous work experience, your linguistic skills, etc., as well as data obtained through correspondence with you) or the data we obtain in the basic screening of your personal data from public sources, such as the LinkedIn network (however, this will also be the data necessary and allowed under the law for the examination of the applicant, in particular the information given in your resume). In connection with a conversation with you or a telephone conversation with you, we can also note how you impressed us or how your responses correspond to the data in your resume.

If we contact you without your prior consent, we will do so only on the basis of the information you have published for that purpose.

In connection with your response to an ad advertised on our website, we may also store certain technical data, i.e. the time of your reply and the IP address from which it is sent.

If you give us permission to use your personal data, we will also keep the data on how and when that consent was granted and when it was withdrawn.

How do we get the data (what are the sources) and how do we process it?

We will primarily obtain the data directly from you.

For specialized positions, we can also contact people whose contact details we obtain from public sources, such as LinkedIn, without having previously been contacted by them. In such cases, we will then contact you as a prospective candidate with an offer to participate in the given hiring round or the inclusion in our Candidate Database. If you agree, we will place you in the selection for a position or enter your name into our database. If you do not agree, we will no longer process your data for this purpose (we may, however, save certain basic information for a reasonable period of time about the fact that we contacted you and why).

If you provide us with references of yours (contacts to your former colleagues, etc.) and you agree for us to contact them, we will process the data obtained from them as well.

Our website www.preol.cz is also used to provide information to jobseekers

By inserting personal data (e.g. by replying to an advertisement or by completing a form on the website) or by agreeing to be included in the interviews and hiring process, you allow our company to use your personal data to select a suitable candidate to fill a position within the current selection process or in the course of another concurrent hiring round for a comparable position. If we would like to use your personal data in other positions or for future hiring rounds, we will ask you to consent to such use.

Please note that you can withdraw your consent to participate in the hiring round at any time at the following contacts for free. We recommend that you either contact directly a person in our staffing division or you e-mail us at osobni.udaje@preol.cz.

In the event when you withdraw your consent or you request cancellation of your participation in the hiring round, you will be excluded from the selection. Withdrawal of consent is without prejudice to the lawfulness of processing based on the consent given prior to the withdrawal.

In addition, we may contact you if you have made your CV available through information sharing services you have registered with (such as jobdnes.cz or jobs.cz). Within such services, resumes are shared with your consent.

What for (for what purpose) will we use your data?

Your personal data will be used primarily to select a suitable candidate to fill a position within hiring activities (including external collaboration). If you are selected to fill the position and a contract is concluded with you, the data you submit (your CV in particular) may become a part of your personal file.

Your basic identification information obtained through your e-mail correspondence with us or within your activity on our website (for example, data obtained from your response to an advertisement) will also be used to protect the rights of our company or third parties from illegal acts (if any) that may be committed in the course of such activities and for the purposes of IT security of our website and of our network.

Information on how you will have given us consent or basic information about you and how we obtained the data on you will also be used to meet our statutory obligations, in particular the obligations under personal data regulations (complying with the requirement to obtain your consent to processing of data) and for the purposes of

verifying the performance of contracts concluded with operators of the abovementioned CV sharing services.

For how long will we be processing your data?

The processing of personal data for the basic purpose, i.e. for the selection of a suitable candidate to fill the position in the current selection process, will be carried out until we fill the position and for about 6 months afterwards (so we can contact you with a job offer in case that the originally selected candidate does not succeed working in the position; after the period of time elapses, e-mails that we exchange with you may be archived for a reasonable period of time for the purpose of protecting our rights or third party rights. If we hire you, your CV and other similar data is included in your personal file and will be processed for the duration of time during which this file is kept.

If you give us permission to use your data for offers of employment in other positions in the future, we will process your data for the above purpose for as long as your consent is valid (not withdrawn).

In order to prove our fulfillment of our obligations under the of personal data protection regulations, we may (after withdrawal of your consent) store information about how we obtained your consent and the scope thereof for a reasonable period of time (usually up to 4 years).

The aforementioned time-limits may also be exceeded in an individual case where the circumstances justify it, for example in case of litigation.

For the other above-mentioned purposes (protection of rights, IT security, compliance with legal obligations), we will process the necessary data (but usually not your CV) for a reasonable period, while considering the adequacy of the period for processing of personal data taking into account the following criteria: (i) the duration of the statutes of limitation with some extra time to allow us to learn whether or not a motion will have been filed or another proceeding will have been commenced, (ii) the probability of legal claims being brought against our company, (iii) the expected time limits for detecting attacks in our network or other findings of security breaches, (iv) the usual threats in the market, (v) the likelihood and significance of imminent risks and (vi) the supervisory practices of the supervisory authorities.

On what legal basis do we process your data?

The legal basis of the aforementioned processing is your consent (for the purposes of your inclusion in the hiring round or into inserting your data in our CV database for future job offers) and the legitimate interests of our company (especially in the first case of obtaining your contact details otherwise than with your consent, for the purpose of processing your data to protect the rights of our company or of third parties from possible illegal threats and for IT security purposes).

Please note that the provision of personal data for processing with your consent is voluntary, but we will not be able to include you in the respective hiring rounds without your consent.

Furthermore, the legal basis of the aforementioned processing is also the compliance of the statutory duties of our company, in particular in the area of the rules on the protection of personal data (EU Regulation No. 2016/679).

Please note that if you agree to the processing of your personal data, you have the right to withdraw your consent at any time. Withdrawal of consent is without prejudice to the lawfulness of processing based on the consent given prior to withdrawal.

Right to objections

If the legal reason of processing your personal data is a justified interest of our company (in particular, data obtained on your activities on our websites processed for the purposes of protection of rights and for IT security and the details of your correspondence with us), you have the right to object to such processing of personal data for reasons related to your particular situation anytime. In such a case, we will not process your personal data further unless there are strong legitimate reasons for processing that override your interests or your rights and freedoms, or unless your personal data are processed for the determination, enforcement, or defense of legal claims. You can raise a complaint against such processing through the contact details listed below or, preferably, via e-mail osobni.udaje@preol.cz. In your e-mail, please state your specific situation that leads you to the conclusion that we should not process your data.

Updating data

If a change occurs to the information you provide in your resume or other dataset you provide (e.g. you obtain a higher qualification, you learn other languages, etc.), please let us know. We will be able to better choose the position we will be offering you.

Whom can we provide the data on you?

We may make your data available in the usual extent to our processors or other recipients - suppliers of external services (typically to programmers or other technical support service workers, including Evidence System and Jobseekers Database, e-mail distribution), to our server operators, or to our technology operators who process the data to ensure the functionality of the relevant services. In addition, personal data may be made available to our legal, economic and tax advisers and auditors who process them for the purpose of providing advisory services to the extent strictly necessary. Upon request or in case of suspicion of an infringement, personal data may also be transmitted to public authorities. The company PREOL will have access to the data on the candidates held by the subsidiaries of the company for the above purposes.

V. NOTE ON PROCESSING OF PERSONAL DATA OF VISITORS TO THE PREOL WEBSITE

For what purposes do we process your data?

Our company does not process the personal data of the users except for the legitimate purposes, for the purposes with which the user has given his / her consent, in particular for the following purposes:

- Traffic data of our site
- Improving the content of our site and the development thereof
- Ensuring the security of our systems and networks against external attacks or misuse by users, following standards that are usual in the marketplace
- Organizing consumer competitions

- For the purpose of keeping accounting records and fulfilling other legal obligations (e.g. documenting consent to processing of personal data, etc.).

Your data will typically be used in our own computer systems or we can use systems of third parties (called "processors").

Legal Basis for the Processing

The legal basis for the processing of your personal data is the necessity to comply with a contract (including enforcement of receivables), legitimate interests (such as the interest in protecting our rights, processing for statistical purposes, measuring traffic on our website and interest of third parties (especially our partners involved in providing services and goods to you and compliance with legal requirements (in particular prevention of wrongdoing, compliance with any requirements under the regulations on the protection of personal data (in particular Act No. 101/2000 Coll. and Regulation (EU) 2016/679, account keeping, fulfillment of tax obligations).

If we need your consent to the processing, you will be asked for such consent.

What data do we collect, for how long and what are the sources thereof?

For the above purposes, we especially collect data on your activity on our website, IP address, date and time of access, basic geographic location, etc.

In the event that we also need your consent, we also store information on when you provide us with such consent and how it was provided (by recording information on the medium and time when you provided your consent, including your IP address from which you have marked a checkbox) and when you withdraw your consent.

All personal data is only processed to the extent necessary for the fulfillment of the above-mentioned purposes and only for the time necessary to achieve the purposes set by us, but at the most for the period stipulated by the relevant legal regulations or in compliance with the relevant legal regulations. Personal data processed with consent are processed until the consent is withdrawn, then the data can be processed if there is another legitimate reason (such as for proof of consent, defense against legal claims, etc.).

To determine the length of time of the processing, we take into account in particular the aspect of (i) the length of the statutes of limitation, (ii) the likelihood of legal claims against our company, (iii) the expected deadlines for detecting attacks in our network or other findings of security breaches, (iv) the usual practice in the market and recommendations of supervisory authorities and (v) the likelihood and significance of imminent risks.

If we need information from you that will directly identify you or allow us to contact you, we will specifically ask you to provide us with your consent.

The source of personal data which we process in relationship to you is especially your activity on our website.

Whom can we provide the data on you?

PREOL may make your personal data available to third parties only in cases where it is required or permitted by law or based on your consent, in particular:

- to suppliers (typically programmers or other support technical services, server services, services related to tracking traffic to our site and customizing content to user preferences),
- to operators of backup servers or technology operators used by the company PREOL who process them to ensure the functionality of the site,
- personal data transmitted may also be made available to public authorities on request or in case of suspicion of an infringement.

Are you required to provide us with the data?

Your personal data is provided by PREOL on a voluntary basis. If there is a legal obligation to provide information in some cases, we will inform you on that.

Consent

If the legal reason for processing of your personal data is your consent, you may withdraw such consent at any time, free of charge, contacting the contact points below. Withdrawal of consent is without prejudice to the lawfulness of processing based on the consent given prior to the withdrawal.

Right to objections

The right to object is an important right of yours. It allows you to review processing of your data based on your legitimate interest. This means that the processing itself is permissible, but there are specific reasons on your side why you do not want the processing to continue. In such a case, PREOL will not process your personal data further unless there are serious legitimate reasons for processing thereof that override your interests or your rights and freedoms, or unless the data is processed for the determination, enforcement, or defense of legal claims. However, the possibility of objection does not apply to cases in which the data is necessary for performance of a contract or if the law requires us to process the data. The right to objections is enshrined in Article 21 of the Regulation.

You can raise a complaint against processing through the contact details listed below or, preferably, via the e-mail address osobni.udaje@preol.cz. Please describe in your e-mail a specific situation that leads you to the conclusion that PREOL should not process the data. Please note that even in the above cases, parallel processing of personal data will also be used for other purposes that will justify PREOL continuing to process such data.

Cookies

We use cookies or other similar network identifiers to distinguish individual computers and individual settings of some services on our website. Cookies are small text files that our servers store on a single computer using a web browser. Cookies can be described as a web page memory which allows the web page to recognize a visit of the web page from the same computer the next time.

Cookies does not serve to obtain any sensitive or personal data.

Standard web browsers support cookies management. For more detailed information, please use the help menu of your browser. If your browser has cookies enabled, we will assume that you agree to the use of standard cookies by our servers.

VI. RISKS AND RECOMMENDED PROCEDURES

Each processing of personal data carries certain risks. These may be different with respect to the extent of the data being processed and the way they are used in processing. Please find below certain best practices that can help protect your data:

- If you provide us with your data, always review whether the data should be provided. In particular, you should carefully consider providing data relating to your personal life and its aspects unrelated to the purposes for which you are providing information to be disclosed (e.g. your comments under press articles, etc.). If you feel that our company requires too much information from you, please contact us to verify the adequacy of our request.
- If you provide us with personal data of third parties (of your family members or other employees of your enterprise, etc.), consider whether this transmission is necessary and needed. If necessary, please request the consent of such third parties.
- If one of our colleagues asks you to provide us with information, do not be afraid to ask if this is necessary and if you cannot achieve the goal of processing even without this information.

- Persons under the age of 18 are particularly vulnerable. If data transfers concern persons under the age of 18, it is necessary to consider all the circumstances very carefully. At the same time, it is necessary to consider whether such persons or their legal representatives (e.g. parents) need to provide consent to transfer of such data. If you are a person under the age of 18, if you have any doubts as to whether you are able to make the right decision, discuss the matter with your parent or contact us separately.
- If you are logged in with your password, please always use a unique strong password that you will not use for other devices and websites. Do not tell anyone nor pass on your password to another person, not even to our employees. We will never ask you for your password, so please beware of the various e-mail messages containing prompts for a password, even if signed on behalf of PREOL. It is likely to be a phishing e-mail to con you to give away your password for the purposes of misusing the password by a third party.
- If you send us confidential information, try to use a secure way of communication, such as encryption of the file and handing over the password via another communication channel.
- If you feel that our company does not fulfilled all its obligations, an unauthorized data leak has occurred or someone wrongfully passes for our coworker, please let us know as soon as possible, either electronically to our e-mail address osobni.udaje@preol.cz or by mail to our address PREOL, a.s. seated at Terezínská 1214, Lovosice 410 02.
- We try to keep these guidelines up to date. That is why we will make adjustments to this document from time to time. We will inform you separately about any more significant modifications, but it is a good idea to read these rules again from time to time.

HOW CAN YOU CAN CONTACT US?

For any comments and queries regarding the protection of personal data and for contact regarding the performance of your legal rights, you can use the following contact details:

PREOL, a.s., Terezínská 1214, 410 02 Lovosice,

e-mail: osobni.udaje@preol.cz

tel.: **416 563727**

Data Box ID: wuyfsxn

This information about processing of personal data is valid and effective as of May 25, 2018. The current version of this document is published on the www.preol.cz website.