

PERSONAL DATA PROCESSING POLICY

Commercial company

EuroPass Ltd.

ID 21030294

with registered office at Vojtěšská 211/6, Nové Město, 110 00 Prague 1

registered in the Commercial Register maintained by the Municipal Court in Prague, Section C, Insert 395917

e-mail: info@dalnicka.cz

(hereinafter referred to as the "**Administrator**")

hereby takes the liberty to inform the data subjects about the principles of personal data processing and certain rights of data subjects arising from the legislation in force. We ask data subjects to read the following to read the data processing principles carefully, as these principles set out the basis on which we will process personal data that we obtain from you as a data subject or that you provide to us you provide. This policy is a clear summary of the most important practices that the controller applies to protect personal data. If you have any questions about the processing and protection of your personal data, please contact the controller at the contact details listed in the header.

Introductory provisions

The company EuroPass Ltd., ID No. 21030294, with registered office at Vojtěšská 211/6, Nové Město, 110 00 Prague 1, registered in the Commercial Register maintained by the Municipal Court in Prague, Section C, Insert 395917 within the meaning of Article 4(7) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter referred to as "**GDPR**") in conjunction with Act No. 110/2019 Coll., on the processing of personal data. The data controller undertakes to protect and respect the data subjects' right to privacy, as the data controller considers the protection of privacy and personal data to be its primary duty. The controller declares that it handles personal data exclusively in accordance with the legislation in force. These principles constitute a generally applicable document which the controller undertakes to follow in protecting and processing of personal data of natural persons as data subjects which the controller has obtained in connection with in connection with the negotiation and any subsequent conclusion of a contract or in connection with any the data subject's free consent to the processing of his or her personal data.

Personal data processing principles

In accordance with Article 5 of the GDPR, the controller is responsible for ensuring that the processing of personal data complies with the principle:

- **lawfulness** - the obligation to determine the legal title for each processing of personal data,
- **fairness and transparency** - the obligation of the controller to ensure that the data subject is as well informed as possible of his or her personal data, including transparent communication with the data subject and openness towards the data subject in relation to his or her personal data. The obligation of the controller to use to communicate with the data subject concerning his or her personal data using plain language and the obligation to provide clear, comprehensible, and accurate information,
- **purpose limitation** - the obligation for the controller to process personal data only for specified, clearly expressed and legitimate purposes,
- **data minimisation** - the obligation for the controller to process only those personal data which are necessary for the performance of the stated purpose of the processing and only to the extent necessary,
- **accuracy** - the obligation to keep and process only up-to-date and accurate personal data and inaccurate data to erase or rectify without delay,
- **storage limitation** - the obligation to keep personal data only for the time necessary for the purposes processing, - integrity and confidentiality
- **integrity and confidentiality** - the obligation to process personal data in such a way as to preserve their security and prevent unlawful or unauthorised processing or damage, destruction, or loss, and is able to demonstrate compliance with these principles.

Rights of data subjects in relation to the protection of personal data

The data subject shall have the right to contact the controller at any time to obtain information about the processing of his or her personal data. The data subject shall have the right to contact the controller at any time to exercise the rights set out below:

- **The right to access the personal data** and the right to request confirmation from the controller as to whether the personal data, concerning him or her is or is not being processed, and the right to request a copy of the personal data processed,

- **the right to rectification** if the data subject considers that personal data held about him or her by the controller, are inaccurate and the right to have incomplete personal data completed,

- **the right to erasure** ('right to be forgotten') of personal data without undue delay if they are no longer necessary for the purpose for which it was collected and processed, if the data subject consents to the

the processing has been revoked and there is no further legal ground for the processing, or if the personal data have been unlawfully processed.

- **the right to restriction of processing** if the data subject contests the accuracy of the personal data, to

the time necessary for the controller to verify the accuracy of the personal data, the processing is unlawful and

the data subject refuses to erase such data, the controller no longer needs the personal data for the purposes of

processing but the data subject requires it for the establishment, exercise or defence of legal claims (e.g. The data subject has objected to the processing in order to exercise a legal right to obtain the data in order to assert a claim in court, or the data subject has objected to the processing, it is not clear whether the legitimate interests of the controller outweigh the legitimate interests of the data subject.

- **the right to data portability** where the data subject requests the controller to receive the personal data relating to him or her in a structured, commonly used, and machine-readable format provided by him or her to the controller,

- **the right to object** to the processing of personal data, including profiling, by the data subject processing on the grounds of legitimate interest. If the data subject objects to the processing personal data for direct marketing purposes, the personal data will no longer be processed for that purpose processed,

- **the right to withdraw consent** where the data subject has consented to the processing of personal data for purposes requiring consent. The data subject shall have the right to withdraw consent in this case at any time. The controller points out that in the event of withdrawal of consent, the processing of personal data that has taken place before the withdrawal of consent is lawful, - the right to lodge a complaint with the supervisory authority, which is the Office for Personal Data Protection, with its registered office Pplk. Sochor 27, 170 00 Prague 7, if the data subject considers that the processing of personal data the rules of personal data protection have been violated. The controller shall provide the data subject, upon request pursuant to Articles 15 to 22 of the GDPR, with information on the measures taken measures without undue delay and in any case within one month of receipt of the request. This period may be extended by a further two years if necessary and considering the complexity and number of requests months. The controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for such postponement. If the data subject makes the request electronically form, the information shall be provided in electronic form where possible, unless the data subject requests another method.

Processing of personal data

The controller declares that it processes the personal data of data subjects that are necessary to fulfil the purpose of of the contract and to protect the legitimate interests and claims of the controller. The controller points out that, in addition to processing personal data on the basis of the subject's free consent data subject's free consent, it is entitled to process personal data without the data subject's consent as provided for by law cases (e.g. in the performance of the controller's obligations under contracts; for the fulfilment of obligations imposed by specific legal regulations; for the protection of the rights and legitimate interests of the controller interests; for the performance of a task carried out in the public interest; to the extent strictly necessary for the legitimate interest of the controller for the purpose of preventing fraud, for the protection against damage to computer systems and electronic communications systems). The controller collects and processes data based on the data subject's free consent, or to the extent strictly necessary, obtained by the controller in connection with the negotiation of the contract and any subsequent conclusion of the contract or based on another legal title. The controller shall process personal data to the extent necessary for the purposes of the contractual relationship or other legal title and to the extent agreed with the data subject, for the purposes of evaluating customer satisfaction, improving services, sending product and service offers, sending commercial communications and newsletters. Personal data is collected, stored and used for the necessary period of time, but at least for for the duration of the contractual relationship or other legal title, for as long as claims may be asserted under a contract with a competent public authority, for as long as is necessary for the protection of rights and claims controller, or for as long as the controller is required by law to do so, or until the consent is withdrawn, if the data

have been provided on the basis of the data subject's consent and the obligation to process personal data is not given to the controller by law. The data are processed in connection with commercial transactions and for the purpose of customer care, informing about news, products, and services, sending selected commercial communications, and obtaining the data subject's views, all for the purpose of improving the care of customers, and to comply with the controller's legal or contractual obligations. The controller shall not disclose personal data to third parties except as provided in this policy. The Controller may share personal data of data subjects with a third party for the purpose of providing information about products and services if the controller has the data subject's consent to do so or if required or permitted by law. The controller is entitled to share the data subject's personal data with a third party to prevent a criminal offence or to reduce potential risks, where required by law or where the controller considers it appropriate to protect the legitimate interests, rights, or property of itself or of third parties. Controller transfers personal data to a third party for the purpose of fulfilling an obligation under a contract (order), namely to the State Fund for Transport Infrastructure with registered office at Sokolovská 1955/278, Prague 9, 190 00, Czech Republic 104/2000 Coll., on the State Fund for Transport Infrastructure, as amended by as amended. Personal data shall be collected, stored, and processed by the controller in a secure manner so that it remains confidential and no unauthorised third party has access to it. Personal data in paper form shall be held by the controller process, store and protect it at its headquarters in a locked room to which only authorised persons have access employees of the controller who are bound by confidentiality. Personal data in electronic form are processed, stored, and protected by passwords and firewalls. If the processing of personal data is based the data subject's consent or the legitimate interests and purposes of the controller, the personal data may be processed by external collaborators and suppliers, by an external law firm, an external accounting firm or external IT support. The entities that cooperate with the controller are carefully selected based on safeguards to ensure the technical and organisational protection of the personal data transmitted. Personal data are archived in accordance with the legal time limits. The controller has set strict internal rules that verify the lawfulness of the holding of personal data, ensuring that personal data are not held by the controller for longer than is authorised. The controller is obliged to carry out the deletion of the relevant personal data after the loss of lawful reason for keeping them.

Final provisions

This Policy shall take effect on 20 December 2023 and shall be issued for an indefinite period.

The controller is entitled to make changes to this policy at any time without the data subject's consent. Current version of this Policy is available for inspection during business hours at the Controller's registered office.