

## The Privacy Policy of 3 November 2020

Dear Sir or Madam,

Please allow us to inform you about how Povrly Copper Industries a. s. ("**we**" or "**our company**") processes your personal data in connection with the performance of our commercial activities.

The purpose of this document is to provide you with information about what personal data we collect, how we process it, what sources we obtain it from, what purposes we use it for, to whom we may disclose it, where you can collect information about your data and what are your rights regarding personal data protection. When processing personal data, we are governed by generally binding legal regulations, and the processing of personal data is always only conducted to the extent determined by the specific service and or purpose of the processing.

Please acquaint yourself with the contents of this document, as we will be happy to answer any questions you may have at our headquarters at Mírová 63, 40332 Povrly, by email [gdpr@pci.cz] and or by phone [00 420 475 315 123].

You can also contact our Data Protection Officer, Ms. Ing. Jana Zimová, by email [dpo@pci.cz] or by phone [00 420 224 492 221].

### I. General information

Our company is obliged to process specific personal data with regards to its commercial activities, in particular, to fulfil legal and contractual obligations. In this respect, we would not be able to provide you with our products/services in any manner without your personal data.

Furthermore, we also process your personal data beyond the extent of our obligations to offer you work opportunities or contact you. For this, we need to obtain your consent.

#### I.I.1. Principles of personal data processing

When processing your personal data, we honour and respect the highest possible standards of data protection and, in particular, comply with the following principles:

- (a) We always process your personal data for a clearly and comprehensibly specified purpose, by stated means, in a stated manner, and only for as long as is necessary for the purposes for which it is processed; we only process accurate client personal data and ensure that the processing is appropriate for the specified purposes and necessary for the fulfilment of those purposes;
- (b) We protect your personal data to a degree as classified information; therefore, we process client personal data in a manner that ensures the highest possible security of such data and that prevents any unauthorized or accidental access to, alteration of, destruction of, or loss of, unauthorized transfer of, or other unauthorized processing of, or any other misuse of clients' data;
- (c) We regularly inform you in an explicit manner about the processing of your personal data and your rights to accurate and complete the information, about the circumstances of this processing, as well as about your other related rights;
- (d) we have set up and maintained appropriate technical and organisational measures to ensure a standard of security appropriate to all potential risks; all persons who have access to the client's personal data are obliged to maintain the confidentiality of information obtained in connection with the processing of such data.

## II. Information on the processing of personal data

### II.1. Information about the administrator

The administrator of your personal data is us, i.e., Povrly Copper Industries a. s., with registered office at Mírová 63, 403 32 Povrly, ID No. 49903039, a company registered in the Commercial Register of the Regional Court in Ústí nad Labem, Section B, Insert 508.

### II.2. Purposes of the processing and legal basis for the processing

#### II.2.1. Processing of personal data without your consent

Generally, we may process your data in situations where you are obliged to provide us with specific personal data as a condition for us to provide you with our product/service, alternatively when we are entitled to process your data obtained by other means.

- (a) We are legally entitled to process your personal data without your consent for the following purposes of complying with our legal obligations, in particular, for
  - (i) preventing damage to our company's property;
  - (ii) preventing fraudulent conduct which our company may be exposed to;
  - (iii) complying with the possible obligation to identify and control the client under the Selected Measures against Legitimation of Proceeds of Crime and Financing of Terrorism Act.
- (b) Entering into or performing a contract with you.

That includes, in particular, the actual realisation of the contractual relationship or other performance of the contract between our company and you. Personal data is necessary, for instance, to enable the contractual relationship to be realised without unreasonable legal risks, including the negotiation of the conclusion or modification of a contract with you.

- (c) Protection of rights and legally protected interests, in particular, for
  - (i) protecting the rights and legally protected interests of our company, collecting debts, realizing collateral or otherwise enforcing claims, developing and advancing the services provided;
  - (ii) negotiations with interested parties for the assignment of our company's claim against the client or for any other form of transfer of receivables, including the related execution, and further related negotiations with third parties, in particular informing the providers of related collateral, etc.;
  - (iii) handling any disputes, above all, for litigation or other matters.
- (d) Our legitimate interests.

That is, in particular, a situation where there is a contractual/customer relationship between you and our company.

#### II.2.2. Processing of personal data with your consent

Generally, we may process your data in situations where you voluntarily consent to us processing your personal data. Based on your consent, our company processes your personal data for the following purposes:

- (a) offering you work opportunities or otherwise contacting you in this context.

### **II.3. Extent of the processing of personal data**

Our company processes your personal data to the extent necessary to fulfil the above purposes. We process **contact data** (contact addresses, telephone numbers, email, and fax addresses, or other similar contact data) and **identification data** (first name, surname, date of birth, residential address, type, number, and validity of the identity card; in the case of a client of a natural person - entrepreneur, also the ID number and VAT number) and **CCTV footage**.

### **II.4. Manner of the processing of personal data**

The manner in which our company processes your personal data includes manual and automated processing in our company information systems and in physical form.

Your personal data is processed primarily by our employees and, to the extent necessary, by third parties. Prior to forwarding your personal data to a third party, we will always enter into a written agreement with that party which contains the same guarantees for the processing of personal data as our company itself complies with per its legal obligations.

### **II.5. Recipients of personal data**

Your personal data is disclosed, in particular, to our company employees in connection with the performance of their work duties that require the handling of client personal data, but only to the extent necessary in each case and in compliance with all security measures.

In addition, your data is forwarded to third parties involved in the processing of personal data or may be disclosed to them for other reasons in accordance with the law.

The forwarding occurs mainly towards:

- (a) our law firm;
- (b) providers of consulting services; and
- (c) processors providing us with server, web, cloud, and IT services.

Prior to forwarding your personal data to a third party, we will always enter into a written agreement with that party that governs the processing of your personal data so that it contains the same guarantees for the processing of your personal data that our company itself complies with per its legal obligations.

### **II.6. Forwarding personal data abroad**

Your personal data is processed in the Czech Republic and is not forwarded to countries outside the European Union.

### **II.7. Duration of the processing of personal data**

Personal data is processed by our company only for the period necessary. We regularly assess whether there is still a need to process specific personal data mandated for a definite purpose. If we determine that it is not vital for any of the purposes for which it was processed, we erase the data. However, internally, we have already assessed the usual duration of the utility of personal data concerning definite purposes of processing personal data, at the end of which we evaluate the need to process the relevant personal data for that purpose attentively. In this context, it also applies that personal data is processed for:

- (a) the performance of the contract: the data is processed for the duration of the contractual relationship with the client. Additionally, the relevant personal data are typically used for ten years, except for extended processing based on generally binding legal regulations;

(b) the employment offer: the data is processed for one year from the end of the recruitment procedure;

(c) the protection of rights and legally protected interests by CCTV footage; furthermore, the relevant personal data is typically used for thirty days.

## **II.8. Right to withdraw consent**

In this document, we have clarified reasons we need your personal data and that we may only process it for specific purposes with your consent. You are not obliged to consent to the processing of your personal data by our company, and you are entitled to withdraw your consent. We wish to reiterate we are also entitled to process specific personal data for definite purposes without your consent. If you withdraw your consent in this case, we will cease processing the relevant personal data for the purposes mandating the appropriate consent but we may be entitled or even obliged to continue to process the same personal data for other purposes.

Should you wish to withdraw your consent to the processing of your personal data, please approach us at our registered office at Mírová 63, 403 32 Povrly or by email at [gdpr@pci.cz].

## **II.9. Sources of personal data**

We obtain the personal data mainly:

- (a) from clients themselves;
- (b) from publicly available sources (public registers, records, or lists);
- (c) from potential candidates for work;
- (d) from our activities by processing and evaluating other personal data of clients;
- (e) from CCTV footage.

## **II.10. Your rights concerning the processing of your personal data**

You can exercise all your rights at our registered office at Mírová 63, 403 32 Povrly or by email [gdpr@pci.cz] provided you can also submit a complaint to the supervisory authority, which is the Office for Personal Data Protection ([www.uoou.cz](http://www.uoou.cz)).

**II.10.1. The right to access** means that you can ask us at any time to confirm whether or not the personal data concerning you are being processed and, if so, for what purposes, to what extent, to whom they are disclosed, how long we will process them, whether you have the right to rectification, erasure, restriction of processing, or to object, where we obtained the personal data and whether the processing of your personal data results in automated decision-making, including possible profiling. You also have the right to obtain a copy of your personal data, the first provision of which is free of charge, but we may require reasonable reimbursement of administrative costs for further procurement.

**II.10.2. The right to rectification** means that you can ask us to correct or complete your personal data at any time if it is inaccurate or incomplete.

**II.10.3. The right to erasure** means that we must erase your personal data if (i) it is no longer necessary for the purposes which it was collected or otherwise processed for, (ii) the processing is unlawful, (iii) you object to the processing, and there are no overriding legitimate grounds for the processing, or (iv) we are required to do so by law.

**II.10.4. The right to restrict** the processing means that until we have resolved any disputed issues regarding the processing of your personal data, we must limit the processing of your personal data so that we can only store it and, where appropriate, use it to determine, exercise or defend legal claims.

**II.10.5. The right to object** means that you can object to the processing of your personal data that we process for direct marketing purposes or on the grounds of legitimate interest. If you object to processing for direct marketing purposes, your personal data will no longer be processed for these purposes.

### **III.**

#### **Final Provisions**

**III.1.** This document is issued indefinitely and shall take effect on 3 November 2020.

**III.2.** We may amend this document at any time by issuing a new complete version; the current version is published on our website, and in addition, it is available at our registered office.

**III.3.** If not otherwise expressly stated, all information provided herein also relates to the processing of personal data of potential clients, i.e., persons with whom we have not yet established a contractual relationship but with whom we are already in contact. To the extent applicable, the above information also applies to the processing of personal data of other persons with whom our company is in direct contact, even if we do not have a contractual relationship with them (e.g., representatives of legal entities).