

INFORMATION ON THE PROCESSING OF PERSONAL DATA

INTRODUCTION

We would like to inform you in a clear and transparent manner about how we process your personal data and what rights you have in this context, so we provide all relevant information here in a clear manner.

We process and protect personal data in full compliance with 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 - hereinafter also referred to as "GDPR") and Act No. 110/2019 Coll., on the processing of personal data. We adhere to the following basic principles when processing personal data:

- we process personal data fairly and in a lawful and transparent manner;
- we collect personal data for specific, explicit and legitimate purposes and do not further process it in a way that is incompatible with those purposes;
- we only process personal data that is adequate, relevant and limited to what is necessary in relation to the purpose for which it is processed;
- we only process accurate (and, where necessary, updated) personal data;

- we only process personal data for a necessary period of time in relation to the purpose for which it is processed;
- we process personal data in a way that ensures their appropriate security, including protection by appropriate technical or organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage.

PERSONAL DATA CONTROLLER

The controller of personal data is Urban & Hejduk s.r.o., advokátní kancelář, with registered office at Jugoslávská 620/29, Vinohrady, 120 00 Prague 2, Czech Republic, ID No.: 034 08 086, registered in the Commercial Register maintained by the Municipal Court in Prague, file No. C 231175 (hereinafter referred to as the "Controller"). The Controller is responsible for the processing of personal data and you may invoke most of your rights against the Controller as set out below.

The controller has not appointed a data protection officer, but has designated a person in charge of this area to oversee the proper processing and protection of personal data.

If you have any questions about the processing of personal data or if you wish to exercise your rights, you can contact the Controller in one of the following ways:

- in person at the Administrator's registered office at Jugoslávská 620/29, Vinohrady, 120 00 Prague 2, Czech Republic;
- by letter delivered to the Administrator's registered office at Jugoslávská 620/29, Vinohrady, 120 00 Prague 2, Czech Republic;
- by email sent to the Administrator's email address info@urbanhejduk.cz;
- by calling the Administrator on +420 226 207 507;
- by a message delivered to the Controller's mailbox with the mailbox identifier aixrifm.

WHAT PERSONAL DATA DO WE PROCESS AND FROM WHICH PERSONS?

We only process personal data that we strictly need to be able to comply with our legal obligations, properly perform our contractual obligations and protect our legitimate interests, or where we have your consent to process. For these reasons, we process personal data of the following persons:

- job seekers with us;
- our employees (including former employees);
- our executive officers and partners (including former executive officers and partners);
- our permanent associates (including former associates);
- our clients and employees or representatives of our clients (including former clients);
- exceptionally, other natural persons.

We always process personal data only to the extent that we necessarily need it for the purpose of processing.

FOR WHAT PURPOSES DO WE NEED PERSONAL DATA?

We determine the purposes of the processing of personal data mainly due to the nature of the contractual or other relationship with you or due to the services provided to you or our legitimate interests.

We process personal data of job applicants for the purpose of selecting a new employee or creating a database of job applicants and contacting persons included in the database with a job offer.

We process employees' personal data for the purpose of fulfilling the employer's obligations set out in the employment contract, employment agreement or work performance agreement concluded with the relevant employee, as well as for the purpose of fulfilling the employer's obligations in relation to employees during the employment relationship set out in the

relevant legislation. We process photographs of employees for the purpose of promoting and presenting our company and our business.

We process the personal data of our executives and partners for the purpose of fulfilling the obligations of the limited liability company in relation to the commercial register set out in the relevant legislation and, in the case of executives, also for the purpose of fulfilling the obligations of the corporation towards the executives set out in the executive contract concluded with the relevant executive. We process photographs of executive officers for the purpose of promoting and presenting our company and our business.

We process the personal data of permanently cooperating attorneys for the purpose of fulfilling the law firm's obligations towards permanently cooperating attorneys set out in the contract on permanent cooperation in the provision of legal services concluded with the respective cooperating attorney. We process photographs of permanently cooperating attorneys for the purpose of promotion and presentation of our company and our business.

We process the personal data of our natural person clients and employees or representatives of our legal person clients and, where applicable, the personal data of other natural persons for the purpose of fulfilling the obligations of the legal service provider towards the client set out in the contract for the provision of legal services concluded with the relevant client (or concluded between the cooperating law firm and the relevant client), as well as for the purpose of fulfilling the obligations set out for obliged persons by Act No. 253/2008 Coll., on certain measures against the legalization of the proceeds of crime and the financing of terrorism, and for the purpose of offering our other services. Exceptionally, we may process photographs of our individual clients and employees or representatives of our corporate clients taken at events organised by us for the purpose of promoting and presenting our company and our business.

We may process the personal data of former employees, executives, partners, permanently cooperating attorneys, clients of natural persons

and employees or representatives of our corporate clients for the purpose of defending a dispute with the person concerned or for the purpose of enforcing claims against that person.

ON WHAT LEGAL BASIS DO WE PROCESS PERSONAL DATA?

We always process personal data on the basis of at least one legal ground (title). If this were not the case, we would not comply with the principle of lawfulness as one of the most important principles of the GDPR.

The processing of personal data is based on the following legal titles:

- compliance with the legal obligation to which we are subject – in the case of processing personal data of our employees, executives, partners, clients of natural persons and employees or representatives of clients of legal persons – in particular the following legal provisions:
 - Act No. 262/2006 Coll., Labour Code;
 - Act No. 582/1991 Coll., on the organisation and implementation of social security;
 - Act No. 589/1992 Coll., on social security contributions and contributions to state employment policy;
 - Act No. 48/1997 Coll., on public health insurance;
 - Act No. 586/1992 Coll., on Income Taxes;
 - Act No. 187/2006 Coll., on sickness insurance;
 - Act No. 89/2012 Coll., Civil Code;
 - Act No. 90/2012 Coll., on Commercial Companies and Cooperatives (Act on Commercial Corporations);
 - Act No. 304/2013 Coll., on public registers of legal and natural persons and on the registration of trust funds;
 - Act No. 85/1996 Coll., on advocacy;
 - Act No. 253/2008 Coll., on certain measures against the legalization of the proceeds of crime and the financing of terrorism;

- implementing regulations to these laws.
- the performance of a contract concluded with you - in the case of processing personal data of our employees, managing directors, permanently cooperating lawyers, clients of natural persons and employees or representatives of clients of legal persons.
- giving your consent to the processing of your personal data for one or more specific purposes - if you apply for a job with us and we would like to keep your personal data after the selection process is over.
- the existence of our legitimate interest - we base the processing of personal data on this legal ground only in cases where your interests or your fundamental rights and freedoms requiring the protection of personal data do not take precedence over our interests - this applies to the processing of personal data of job applicants, the processing of personal data for the purpose of defending a dispute or enforcing a claim, and the processing of personal data for the purpose of offering our other services or promoting and presenting our company and our business.

HOW LONG DO WE KEEP PERSONAL DATA?

We only store personal data for as long as is strictly necessary for the purpose of processing. If we are required to process personal data by law, it usually also specifies the period of time for which we are to do so. If we process personal data in order to be able to perform a contract concluded with you, it is necessary to process the personal data for the entire duration of the contract. Personal data processed on the basis of consent is stored by us for the period for which the consent was given and, of course, only until the consent is withdrawn. If the processing of personal data is necessary for the purposes of our legitimate interest, we only process it for as long as this legitimate interest lasts.

FROM WHOM DO WE COLLECT PERSONAL DATA?

We primarily obtain personal data directly from you or in connection with a mutual contractual relationship. You are therefore in control of what personal data you provide to us and what you do not.

We may also obtain some personal data from public sources, such as public registers or the internet. In certain cases, we also obtain personal data from other data controllers, but we are obliged to inform you of this.

TO WHOM DO WE TRANSFER PERSONAL DATA?

Personal data is available to our employees and cooperating attorneys who need it for their work. The transfer of personal data outside our company only occurs when necessary, in particular in the following cases:

- the transfer of personal data is required by law (this mainly concerns the transfer of personal data to state authorities or authorities);
- the transfer of personal data is necessary for us to fulfil our obligations under the contract with you;
- we transfer personal data to our processor - this transfer occurs in situations where we are unable to carry out an activity involving the processing of personal data ourselves (or it is disadvantageous for us to do so) and we have entrusted it to another person; this person is our processor for the purposes of the GDPR; we have verified that they provide sufficient guarantees that appropriate technical and organisational measures are in place to ensure that the processing of personal data carried out by them complies with the requirements of the GDPR and that your rights are protected; there is always a written contract with this processor for the processing of personal data, which sets out the subject matter and duration of the processing, the nature and purpose of the processing, the type of personal data and category of data subjects, our obligations and rights; this processor also has certain obligations set out directly in the GDPR Regulation; however, the responsibility for the processing of personal data always lies with the Controller (not the processor).

We never transfer your personal data to a third country (i.e. outside the European Union or the European Economic Area) or to international organisations.

WHAT RIGHTS DO YOU HAVE IN RELATION TO THE PROCESSING OF PERSONAL DATA?

You have a number of rights in relation to the processing of your personal data, which are explained in detail below. At the outset, however, we need to provide some general information relating to the exercise of your rights. We have a duty to facilitate the exercise of your rights, so you can contact us in this regard in various ways (in person, by letter, by email, by telephone, by data mailbox). Contact details for all these methods can be found above. As it is our obligation to verify your identity when examining your request, some ways of exercising your rights are more appropriate than others. The following are ideal ways to exercise your rights that will save you and us time:

- sending a letter to our registered office with your certified signature;
- sending an email to our email address signed with your guaranteed electronic signature;
- sending a data message to our data box;
- in person at a pre-arranged meeting.

In order for us to be able to process your request quickly and properly, the following must be clear from the request:

- who is making the application (name of the applicant, date of birth and address);
- what right you are exercising by making the request (just describe it in words or by referring to the relevant article of the GDPR Regulation);
- what you are asking for and why (explained in more detail below for each right);

- how you wish to receive the reply (by letter, email, telephone, data box);
- your contact details (phone, email) for any additional questions we may have.

We are obliged to deal with your requests free of charge, however, if your requests are manifestly unfounded or unreasonable, in particular because they are repetitive, we have the right to require you to pay a reasonable fee taking into account the administrative costs involved in providing the information or communication requested or in taking the action requested, or we have the right to refuse to comply with your request.

We will always respond to your request within one month of receiving it.

And now to the individual rights.

Right of access to personal data

You have the right to ask us to confirm whether we process your personal data and to obtain an overview of this data from us. You also have the right to receive the following information from us in relation to the processing of your personal data:

- purposes of processing your personal data;
- the categories of your personal data concerned;
- the recipients or categories of recipients to whom your personal data has been or will be disclosed;
- the intended storage period of your personal data;
- the existence of the right to request from us the rectification or erasure of your personal data, the right to restrict its processing or the right to object to its processing;
- the right to lodge a complaint with the supervisory authority;
- all available information about the source of the personal data, unless we have obtained your personal data directly from you.

In the event that this is not clear from your request, we may ask you to specify exactly what personal data you are requesting.

If you also wish to receive a copy of your personal data that we process, you have the right to do so and the first such provision is free of charge. For further copies, we may charge a reasonable fee not exceeding the cost of providing the information. The exercise of this right must not adversely affect the rights and freedoms of others.

Right to rectification of personal data

You have the right to ask us to correct personal data we process about you that is incorrect or inaccurate. You just need to let us know what data and how to correct it. We will do so without undue delay.

You also have the right to ask us to complete your personal data that we process and that are incomplete, according to your instructions. We will comply with your request if we actually need the supplemented personal data for the purposes of the processing.

If you ask us to do so in exercising this right, we will also inform you of the recipients of your personal data to whom your personal data has been disclosed in the past and to whom we have notified the corrections or additions to your personal data requested by you.

Right to erasure ("right to be forgotten")

You have the right to ask us to delete your personal data in the following cases:

- you believe that we no longer need your personal data for the purposes for which we collected or otherwise processed it;
- you have withdrawn your consent to the processing of your personal data on the basis of which we processed your personal data and you are of the opinion that we no longer have any further legal basis for processing it;

- you have objected to us processing your personal data on the basis of our legitimate interests and you are of the opinion that we no longer have any overriding legitimate grounds for processing it;
- you have objected to us processing your personal data for direct marketing purposes;
- you believe that we are processing your personal data unlawfully;
- you believe that we are subject to an obligation to erase your personal data under European Union law or the law of a European Union member state.

When exercising this right, you must specify in your request on the basis of which of the above cases you request the erasure of your personal data and also exactly what personal data you request to be erased. Your request should also be duly substantiated, otherwise it cannot be granted. If we find your request justified and the processing of your personal data is not necessary:

- for the exercise of the right to freedom of expression and information;
- to comply with a legal obligation that requires processing under the law of the European Union or of a Member State of the European Union to which we are subject, or to carry out a task carried out in the public interest or in the exercise of official authority vested in us;
- for reasons of public interest in the field of public health;
- for archiving purposes in the public interest, for scientific or historical research purposes or for statistical purposes, where the right to erasure is likely to prevent or seriously jeopardise the achievement of the purposes of that processing;
- for the establishment, exercise or defence of legal claims;

we will delete your requested personal data without undue delay.

Where we have disclosed your personal data and subsequently erased it under your right to erasure, we are also obliged to ensure that, taking into account the technology available and the cost of implementation,

including technical measures, we inform the controllers who process your personal data that you require them to erase any references to, copies of or replications of your personal data.

If you request us to do so in exercising this right, we will also inform you of the recipients of your personal data to whom your personal data has been disclosed in the past and to whom we have notified you of the deletion of your personal data requested by you.

Right to restriction of processing

Restriction of the processing of personal data means the marking of personal data and the cessation of all processing except storage. In other words, personal data whose processing is restricted is still retained by the controller (i.e. it cannot be erased), but the controller is not entitled to use such personal data in any way.

You have the right to request us to restrict the processing of your personal data in the following cases:

- you deny the accuracy of your personal data;
- you believe that we are processing your personal data unlawfully, but instead of erasing your personal data, you only request a restriction on its use;
- we no longer need your personal data for processing purposes (we should therefore delete it), but you require it for the establishment, exercise or defence of legal claims;
- you have objected to us processing your personal data on the basis of our legitimate interests, which has not yet been decided by us.

When exercising this right, you must specify in your request on which of the above grounds you request the restriction of the processing of your personal data and also the processing of exactly which of your personal data you request to be restricted. Your request should also be duly substantiated, otherwise it cannot be granted.

If we find your request justified, we will restrict the processing of the personal data you have requested without undue delay. During the period of this restriction, we are only entitled to process your personal data with your consent or for the establishment, exercise or defence of legal claims, for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or a Member State of the European Union.

If the reasons for restricting the processing of your personal data no longer apply, we will notify you and then cancel the restriction.

If you request us to do so in exercising this right, we will also inform you of the recipients of your personal data to whom your personal data has been disclosed in the past and to whom we have notified the restriction on the processing of your personal data requested by you.

Right to object

If we process your personal data on the basis of our legitimate interest, you have the right to object to this at any time and to request that we no longer process your personal data in this way. Your request must clearly state to which of your personal data the objection relates and what processing is objected to. Your request should also be reasonably substantiated.

Upon receipt of your request, it is our obligation not to further process your personal data or to demonstrate to you that there are compelling legitimate grounds for such processing which override your interests or rights and freedoms or that the processing of your personal data is necessary for the establishment, exercise or defence of legal claims.

If we process your personal data for direct marketing purposes, you have the right to object to this at any time and to request that we no longer process your personal data in this way. Your request must clearly state that you object to processing for direct marketing purposes and to which of your personal data it relates.

Once we have received your request, we are obliged not to process your personal data further for direct marketing purposes.

Other rights

If we process your personal data on the basis of your consent to the processing of your personal data, you have the right to withdraw this consent at any time. However, the withdrawal of consent does not affect the lawfulness of processing based on consent given before the withdrawal.

If you believe that the processing of your personal data has violated the GDPR, you have the right to lodge a complaint with a supervisory authority, in particular in the country of your habitual residence, place of employment or place where the alleged violation occurred. This supervisory authority for the Czech Republic is the Office for Personal Data Protection, located at Pplk. Sochor 27, 170 00 Prague 7, Czech Republic, ID No.: 708 37 627, www.uoou.cz.

CONCLUSION

We sincerely hope that the above information is clear to you. If you still do not understand something or are unsure about something, you can always contact us with questions. This will avoid many misunderstandings.

Prague, 1 January 2020

• **Urban & Hejduk s.r.o., law firm**