

Principles of MTX Group a.s. for the processing of personal data

Dear customer,

let us inform you about how in the company MTX Group a.s. (hereinafter referred to as “**we**” or “**our company**”) in connection with the performance of our business activities, we process your personal data.

The purpose of this notice is to provide you with information about what personal data we collect, how we handle it, from what sources we obtain it, for what purposes we use it, to whom we may provide it, where you can obtain information about your personal data and what are your individual rights in the field of personal data protection. When processing personal data, we follow generally binding legal regulations and the processing of personal data always takes place only to the extent given by the specific service and / or purpose of processing.

Please get acquainted with the content of this notice and we will be happy to answer any questions you may have at our headquarters at Štěpánská 621/34, Postal Code 112 17 Prague 1, by e-mail dpo@mtxgroup.cz and / or by phone + 420 224 492 247.

Our Commissioner for Personal Data Protection, Mrs. Jana Zimová, is at your disposal at email: dpo@mtxgroup.cz or phone + 420 224 492 247.

I. General Information

With regard to its business activities, our company is obliged to process certain personal data, especially for the purposes of fulfilling legal and contractual obligations, serving for your unambiguous and unmistakable identification. In this respect, we would not be able to provide you with our products / services at all without providing us your personal data.

I.1. Principles of personal data processing

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

(a) We always process your personal data for a clearly and comprehensibly defined purpose, by specified means, in a specified manner, and only for the time necessary for the purposes of their processing; we process only accurate personal data of clients and we ensure that their processing corresponds to the specified purposes and is necessary for the fulfillment of these purposes;

(b) We protect your personal information as classified information; therefore, we process clients' personal data in a way that ensures the highest possible security of such data and which prevents any unauthorized or accidental access to clients' personal data, their change, destruction or loss, unauthorized transfers, their other unauthorized processing, as well as other misuse;

(c) we always inform you in a comprehensible manner about the processing of your personal data and about your claims for accurate and complete information about the circumstances of this processing, as well as about your other related rights;

(d) we have established and maintain appropriate technical and organizational measures in our company to ensure a level of security that commensurate with all possible risks; All persons who come into contact with clients' personal data are obliged to maintain the confidentiality of information obtained in connection with the processing of such data and personal data are under constant physical, electronic and procedural control.

II. Information on the processing of personal data

II.1. Administrator information

The administrator of your personal data is us, i.e. MTX Group a.s., with its registered office at Štěpánská 621/34, Prague 1, Postal Code 112 17, Company ID: 27441261, entered in the Commercial Register maintained by the Municipal Court in Prague, Section B, Insert 10649, pursuant to Act no. 110/2019 Sb. on the processing of personal data, as amended, and Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC.

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

II.2.1 Processing of personal data without your consent

These are usually situations where you are obliged to provide us with certain personal data as a condition for us to be able to provide you with our product / service, or when we are authorized to process your personal data obtained in another way.

a) We are entitled by law to process your personal data without your consent for the following purposes of complying with our legal obligations, in particular to

- (i) prevent damage to our company's property;
- (ii) prevent any fraud to which our company may be exposed;
- (iii) fulfill any obligation in the identification and control of the client pursuant to Act No. 253/2008 Coll., on Certain Measures against the Legalization of Proceeds from Crime and Terrorist Financing, as amended.

b) Concluding or performing a contract with you.

It is mainly the actual implementation of the contractual relationship or other performance of the contract between our company and you. Personal data is necessary, among other things, in order to be able to carry out the contractual relationship without unreasonable legal risks, including negotiations on concluding or amending a contract with you.

c) Protection of the rights and legally protected interests, in particular for

- (i) protection of the rights and legally protected interests of our company, recovery of receivables, realization of security or other exercise of receivables, development and evolution of services provided;
- (ii) negotiations with those interested in assigning a receivable of our company to a client or in another form of transfer or assignment of a receivable, including related realization, and other subsequent negotiations with third parties, in particular informing providers of related collateral, etc.;
- (iii) resolving any dispute agenda, in particular for the purpose of litigation or other disputes.
- (d) Our legitimate interests.

This is especially the case where there is a contractual / customer relationship between you and our company.

II.2.2. Processing of personal data with your consent

This is usually a situation where you voluntarily agree to the processing of your personal data, for which there is no other reason generally established by binding regulations.

II.3. The scope of processed personal data of clients

Our company processes your personal data to the extent necessary to fulfill the above purposes. We process **contact information** (contact addresses, telephone numbers, e-mail and fax addresses or other similar contact

information) and **identification data** (name, surname, date of birth, permanent residence address, type, number and validity of identity card; for a client of a natural person - entrepreneur also ID number and VAT number), **camera recordings**.

II.4. Method of processing personal data and recipients of personal data

The way our company processes your personal data includes manual and automated processing in our company's information systems and in physical form.

Your personal data is passed on to third parties who participate in the processing of personal data of our company's clients, or this personal data may be made available to them for another reason in accordance with the law and always only to the extent necessary in that case and in compliance with all security measures.

The transmission occurs in particular towards:

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

Before any transfer of your personal data to a third party, we will always enter into a written contract with this person, which contains the same guarantees for the processing of personal data as our company itself fulfills in accordance with its legal obligations.

II.5. Transfer of personal data abroad

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

II.6. Time of processing personal data

Our company processes clients' personal data only for the time that is necessary with regard to the purposes of their processing. We are constantly assessing whether there is still a need to process certain personal data needed for a specific purpose. If we find that they are no longer needed for any of the purposes for which they were processed, we destroy the data. Internally, however, in relation to certain purposes of personal data processing, we have already evaluated the usual useful period of personal data, during which we assess the need to process relevant personal data for that purpose. In this context, personal data processed for the purposes of:

- (a) processing the performance of the contract for the duration of the contractual relationship with the client; furthermore, the relevant personal data are normally usable for a period of ten years, except in cases of longer processing under generally binding legislation;
- (b) protection of rights and legally protected interests in the form of camera recordings; furthermore, the relevant personal data are usually usable for a period of thirty days.

II.7. The right to withdraw consent

In this communication, we have explained to you the reasons why we need your personal data and that for some purposes we may only process it with your consent. You are not obliged to give consent to the processing of your personal data to our company and at the same time you are entitled to revoke this consent. We remind you here that we are entitled to process certain personal data for certain purposes also without your consent. In such case, if you revoke your consent, we will terminate the processing of the relevant personal data for purposes requiring the relevant consent, but we may be entitled, or even obliged, to continue processing the same personal data for other purposes.

In the event that you wish to revoke your consent to the processing of personal data, please contact us at our registered office at Štěpánská 621/345, Postal Code 112 17 Prague 1 or by an e-mail dpo@mtxgroup.cz.

II.8. Sources of personal data

We obtain personal data of clients mainly:

- (a) from the clients themselves;
- (b) from publicly available sources (public registers, records or lists);
- (c) from its own activities, namely by processing and evaluating other personal data of clients;
- (d) from other entities as necessary to protect our rights;
- (e) from camera recordings.

II.9. Your rights in connection with the processing of your personal data

You can exercise all your rights at our registered office at Štěpánská 621/345, Postal Code 112 17 Prague 1 or by e-mail dpo@mtxgroup.cz, with the provision that you can also file a complaint with the supervisory authority, which is the Office for Personal Data Protection (www.uoou.cz).

II.9.1. The right of access means that you can request our confirmation at any time as to whether or not the personal data concerning you are processed and, if so, for what purposes, to what extent, to whom they are made available, for how long we will process them, whether you have the right to correct, delete, limit the processing or raise an objection from where we obtained personal data and whether there is an automatic decision-making based on the processing of your personal data, including possible profiling. You also have the right to obtain a copy of your personal data, with the first provision being free of charge, and we may demand reasonable reimbursement of administrative costs for subsequent provision.

II.9.2. The right to rectification means that you can ask us at any time to correct or supplement your personal data if it is inaccurate or incomplete.

II.9.3. The right to erasure means that we must erase your personal data if (i) they are no longer needed for the purposes for which they were collected or otherwise processed, (ii) the processing is illegal, (iii) you object to the processing and there are no overriding legitimate reasons for processing, or (iv) imposes a legal obligation on us.

II.9.4. The right to restrict processing means that until we resolve any disputes regarding the processing of your personal data, we must restrict the processing of your personal data so that we can only have it stored and, if necessary, use it to determine, enforce or defend legal claims.

II.9.5. The right to object means that you can object to the processing of your personal data, which we process for direct marketing purposes or for 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 notice is issued for an indefinite period and takes effect starting on 29 September 2020.

III.2. We may change this notice at any time by issuing a new full text thereof; its current version is published on the website of our company and is also available at our headquarters.

III.3. Unless expressly stated otherwise, all information provided here also relates to the processing of personal data of potential clients, i.e. persons with whom we have not yet entered into a contractual relationship but who are already in contact with us. The information provided here also applies to a

reasonable extent to the processing of personal data of other persons with whom our company is in direct contact, although we do not have a contractual relationship with them (e.g. representatives of legal entities).