

Privacy Policy.

INAPA s.r.o. (the „company / firm“) issues this privacy policy. Under Regulation (EU) 2016/679 (GDPR), our firm is the controller of your personal data — it processes the data, determines the purpose and means of processing and is responsible for it. The aim is to give you clear, understandable information about how we process your personal data.

The information in this document applies to natural persons providing personal data — primarily our customers and business partners, but to a reasonable extent also potential and former customers and partners and their family members or representatives.

— IN THIS TEXT YOU WILL LEARN IN PARTICULAR

- 01 what personal data we process;
- 02 for what purposes and how we process your personal data;
- 03 to whom your personal data may be disclosed;
- 04 for how long we will process your personal data;
- 05 what rights you have regarding the protection of your personal data.

If you need advice or wish to discuss further processing of your personal data, you can contact us at any time at inapa@inapa.cz.

— PRINCIPLES OF PERSONAL-DATA PROCESSING

- ◆ We process your personal data fairly, lawfully and transparently.
- ◆ Collection takes place solely for explicitly stated, legitimate purposes and we do not further process the data in an incompatible way.
- ◆ The scope of data processed is adequate, relevant and limited to the necessary minimum for the stated purposes.
- ◆ We take reasonable measures so that processed data is accurate and up to date and inaccurate data is corrected or erased without delay.
- ◆ We retain data only for as long as necessary for the purposes for which it is processed.
- ◆ Processing ensures appropriate security with suitable technical and organisational measures against unauthorised processing, loss, destruction or damage.

— SCOPE OF PERSONAL-DATA PROCESSING

- ◆ **Identification and address data:** academic title, name, surname, date of birth, permanent residence, delivery or other contact address, for a self-employed person also the business name, registered office and company ID.
- ◆ **Electronic contact data:** telephone, mobile phone, fax, e-mail address, data-box ID.
- ◆ **Data needed to perform a contract:** bank account number, payment amounts and possibly other such data.
- ◆ **Creditworthiness and trustworthiness data:** records of consumer history and payment performance including information from public registers; other data provided in contractual or other documents.

— OBTAINING PERSONAL DATA

We obtain your personal data mostly from you, some from publicly available sources. We always inform you whether providing the data is a legal or contractual requirement and what the consequences of not providing it are. We obtain it from you mainly on the basis of your requests and during negotiation of a contract, in personal, telephone or written communication including e-mail.

Publicly available sources

- ◆ the commercial register,
- ◆ the insolvency register,
- ◆ exceptionally social networks and the internet, if you publish the data yourself.

Exceptionally we may obtain data from third parties authorised to handle it, subject to defined conditions.

— PURPOSE OF PROCESSING

We process your personal data to the extent necessary for the given purpose and for the time necessary to fulfil it. We process it for the following purposes:

- ◆ concluding and performing contracts and handling your requests,
- ◆ our legitimate interests,
- ◆ marketing purposes.

a) Concluding and performing contracts and handling requests

We process the data to perform both parties' contractual obligations, to validly conclude, change and terminate contracts and for related invoicing, claims and communication. Provision is a contractual requirement. We process it for the duration of the contract and until obligations under it are settled.

b) Legitimate interests

- ◆ **Debt recovery and defence of legal claims** — we pass data to third parties for recovery and retain it for the limitation periods, or for the duration of court or enforcement proceedings.
- ◆ **Enquiry for products and services** — we may approach an existing supplier to a limited extent even without consent (company ID, address and contact data); processing stops if an objection is raised.
- ◆ **Offer of products and services** — we may approach an existing customer to a limited extent even without consent; processing stops if an objection is raised.
- ◆ **Company management, research, internal evaluation and reporting** — to a limited extent for statistics, analyses and internal reporting; results are usually anonymised.

c) Marketing purposes

With your consent we may use your name, surname, e-mail and address to send commercial messages. We process the data for the duration of the contractual relationship and a further 3 years, or until you withdraw consent. Consent is voluntary and can be withdrawn at any time (in person, in writing or at inapa@inapa.cz) without affecting the contractual relationship.

— WHO HAS ACCESS TO YOUR DATA

For the purposes above we may pass your data to contractual partners who process it for us:

- ◆ an external law firm,
- ◆ processors providing server, web, cloud or IT services,
- ◆ other processors supporting data confidentiality in line with the GDPR.

— PROCESSING PERIOD

We process the data for as long as we provide our services or perform the mutual contract, or for the time necessary to meet archiving obligations under legal regulations (e.g. the Accounting Act, the VAT Act).

Regarding our processing you have the right:

- 01** of access to personal data,
- 02** to rectification,
- 03** to erasure („the right to be forgotten“),
- 04** to restriction of processing,
- 05** to object to processing,
- 06** to lodge a complaint about the processing of personal data.

You can exercise all rights by contacting us at inapa@inapa.cz. A complaint can be lodged with the supervisory authority, the Office for Personal Data Protection (www.uoou.cz).

This Privacy Policy is effective from 1 January 2020. INAPA s.r.o., Průmyslová 223, 674 01 Třebíč.