

PRIVACY POLICY OF THE COMPANY ITW PRONOVIA

in accordance 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 (hereafter "**GDPR**").

A. INTRODUCTION AND DEFINITIONS

This document provides information on the manner and scope of the processing and the protection of personal data provided. The document is intended for you - our customers, suppliers and business partners (including your employees or cooperating third parties). This document describes the processing of personal data by company ITW PRONOVIA, s.r.o., with the registered office at Velká Bíteš, Vlkovská 595, 595 01, Czech Republic, company ID: 46965823, registered in the commercial register held by Regional Court in Brno, Section 6777, Entry C (hereinafter as the "**Controller**").

personal data - means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

sensitive personal information - special categories of the personal data that could reveal racial or ethnic origin, religion, political or philosophical beliefs, trade union membership, information about your state of health or sex life, genetic data or biometric data for the unique identification of the person.

processing - any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

processor - a natural or legal person, public authority, agency or other entity that processes personal data for the Controller.

receiver - natural or legal person, public authority, agency or other entity to whom personal data are provided, whether or not a third party. However, public authorities which can obtain personal data in the framework of a special inquiry in accordance with the law of a respective member state are not considered to be the receiver; the processing of such personal data by those public authorities must be in accordance with the applicable data protection rules for the purposes of processing.

data subject - natural person to whom the personal data relate, it can also involve your employees, members of the bodies of corporations, individuals cooperating with you.

third party - a natural or legal person, a public authority, an agency or other entity who is not the data subject, the Controller, the processor, or a person directly subject to the controller or processor authorized to process personal data.

B. TYPES OF PERSONAL DATA COLLECTED

Before or during the course of the contractual relationship, the Controller may process personal data about you, respectively about data subjects, specifically those personal data that were provided by you to the Controller (for the purpose of realisation of the contractual relationship) before or during the contractual relationship. The Controller process, inter alia, the following types of personal data:

- Identifying information, such as title, name, surname, date of birth, job position, employer name

- contact details such as permanent residence address, contact address, telephone numbers and e-mail addresses,
- information from mutual communication, such as information contained in e-mails, records of phone calls, minutes of meetings, records of contact forms or applications submitted via our website or Help-Desk;
- billing and transaction data, such as bank account number, invoice information, payment information received;
- geolocation information, such as information from your internet browser or mobile apps you use;
- image files from CCTV and the information about the entry from electronic access control systems.

C. PURPOSE AND LEGAL BASIS OF THE PROCESSING OF PERSONAL DATA

The Controller collects and uses the personal data provided by you in order to perform an agreement or a contract that should or will be concluded between you and the Controller. Additionally, the Controller collects and processes personal data provided by you in case this is required by the relevant applicable legislation or a decision of the public authority.

In the cases that the processing of personal data is not necessary for performance of the contract or not required by applicable law, the Controller may in limited cases specifically ask you for your consent or to secure it and that with certain ways of using of the personal data. If the Controller requests a consent, you always have an option to reject it. If you provide the consent, then the data subject who gave the consent is entitled to withdraw such consent at any time.

Further, the Controller may also collect and process personal data without consent if it is necessary for other legitimate purposes of Controller, for example:

- management and development of business relationships;
- ensuring the security and protection of the assets of the Controller and other legitimate interests of the Controller;
- investigation potential incidents or violations of the obligations arising from legislation and / or regulations;
- where necessary for compliance, such as the collection and provision of personal data in accordance with regulatory requirements, tax laws or at the request of the police;
- on the basis of the court's authorization or in the exercise or defence of the statutory rights of the Controller;
- if it is necessary to protect your vital interests (or the vital interests of another person).

D. PROCESSOR OF PERSONAL DATA

The Controller may also share the provided personal data with other parties – processors, including but not limited to:

- other companies, which with the Controller forms group of companies within the meaning of § 71 et seq. Act No. 90/2012 Coll., on Commercial Corporations;
- those which provide the Controller with goods or services (such as financial, tax and legal advisers, other consultants, providers of data storage or webmail/information systems);
- other third parties, as regards the sharing of personal data (1) based on your consent, or (2) it is necessary (i) to comply with legal obligations, (ii) to submit or to make a real or potential claim or to defend before an actual or potential claim, or (iii) to protect your vital interests (or the vital interests of another person), (iv) the performance of contracts concluded between the Controller and the third party.

E. TERM OF DATA STORAGE

Personal data will be kept only for the time necessary to fulfill the purposes described herein (or other purposes, which will be provided), or otherwise required by agreements concluded between the Controller and the third party, applicable laws and other internal regulations of the Controller.

F. SOURCES OF PERSONAL DATA

We obtain the most personal data directly from you, based on our mutual communication during our business cooperation, both during pre-contract stage and during contract implementation. In addition, personal data may also come from publicly available sources, public registers and records (e.g. business register, debtor register, professional registers). The Contractor may also obtain personal data from third parties, which are authorized to access and process personal data. In premises of Controller, the Controller can get the personal data from electronic access control systems or from CCTV (if applicable).

G. RIGHTS OF DATA SUBJECT

Everyone as the data subject has the right to:

- **access to personal data (Article 15 GDPR)**

According to Article 15 of GDPR, the data subject has the right of access to personal data, which includes the right to obtain from the Controller: a) a confirmation of processing personal data, b) information on purposes of processing, categories of personal data concerned, receivers, the data were or will be made available, the scheduled processing time, the existence of the right to require the Controller to correct or delete personal data relating to the data subject or to limit their processing, or to object to such processing, to file a complaint with the Supervisory Authority about any available information about the source of personal data unless provided by the data subject, the fact that automated decision making, including profiling, of appropriate safeguards when transferring data outside the EU is made; (c) where the rights and freedoms of others and a copy of personal data are not adversely affected.

- **rectification of personal data (Article 16 GDPR)**

Pursuant to Article 16 of GDPR, the data subject has the right to correct inaccurate personal data processed by the Controller. The data subject is also required to report changes to his or her personal data and to demonstrate that such a change has taken place. At the same time, it is required to provide cooperation if it is discovered that the personal data processed by the Controller are not accurate. The rectification will be done without undue delay, but always with respect to the technical limitations.

- **erasure of personal data (Article 17 GDPR)**

Pursuant to Article 17 of GDPR, the data subject has the right to erase personal data concerning him / her if the Controller does not prove legitimate reasons for the processing of such personal data. The Controller has mechanisms in place to ensure automatic anonymization or deletion of personal data if it is no longer needed for the purpose for which it was processed.

- **restrictions on the processing of personal data (Article 18 GDPR)**

According to Article 18 of GDPR, the data subject has the right to limit the processing until the decision on his or her complaint will be in place, whereas may concern the accuracy of the personal data, the reasons for its processing or if it objects to their processing.

- **Personal data portability (Article 20 GDPR),**

Under Article 20 of GDPR, the data subject has the right to the portability of the data relating to him or her which he or she has provided to the Controller in a structured, commonly used and machine-readable format, and the right to ask the Controller to forward the personal data to another controller. If the data subject provides personal data in the context of the contract or by agreement, and the processing of the data is automated, the data subject is entitled to obtain such data in a structured, commonly used and machine-readable format. If it is technically feasible, the data may

be passed on to the respective controllers, if the person acting under the respective Controller is duly identified and can be authorized. If the exercise of this right could adversely affect the rights and freedoms of third parties, the data subject's requests will not be accepted.

– **object to processing of personal data (Art. 21 GDPR)**

Under Article 21 of GDPR, the data subject has the right to object to processing of his or her personal data, if the purpose of the processing of personal data is legitimate interest of the Controller. Where the Controller does not demonstrate and prove that there is a serious legitimate reason for processing that overrides the interests or rights and freedoms of the data subject, the personal data shall no longer be processed by the Controller for such purposes.

– **not to be subject to an automated individual decision making**

The data subject has right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

– **withdrawal of consent to the processing of personal data**

If the Controller processes personal data on the basis of consent, the data subject has the right to withdraw his or her consent at any time.

– **submit a complaint to the Office for Personal Data Protection**, with its registered office at Pplk. Sochora 727/27, 170 00 Prague 7 - Holešovice, tel.: +420 234 665 111, email: posta@uouu.cz and in the event that you think that was violated your right to privacy.

Please note that in connection with the above described data subject's rights may there be limitations or exceptions from applying a right. The Controller will work with the data subject to discuss any possible exceptions or limitations for the case that the data subject wishes to exercise the right. If you have any questions about the rights of the data subject or if you want as a data subject to claim to exercise of such rights in connection with the personal data contained in this policy, please contact the Controller contact person whose contact information is stated below.

H. SECURITY OF PERSONAL DATA

The Controller is aware of the importance and value of personal data and therefore has implemented and appropriate organizational and technical measures to ensure the security of your personal data. Personal data are managed and processed in compliance with all applicable legislation, in particular in compliance with GDPR, but also in compliance with the legislation regarding protection of the personality of a natural person. Persons handling with personal data are bound by confidentiality and compliance with the legal and internal regulations of the Controller.

I. CONTACT INFORMATION OF THE CONTROLLER

If you have any questions or comments regarding the exercise of your rights, this Privacy Policy, or practice of Controller, at any time you can contact: Aneta Mocová, ITW Pronovia, s.r.o., Řepov 184, 293 01 Mladá Boleslav, e-mail: aneta.mocova@itwautomotive.com or RepovCZ-GDPR@itwautomotive.com

This Privacy Policy become effective on May 25, 2018. The Controller is authorized to change this Privacy Policy at any time, whereas a new version shall be published on Controller's website.