

PRIVACY POLICY

Through this Privacy Policy (hereinafter the "Policy"), we inform the data subjects whose personal data we process about all processing activities and the policy of privacy protection of the data subjects.

1. Responsible persons

Controller of personal data:

Saft Ferak a.s., ID No. 270 94 308, with its registered office at No. 247, 739 04 Raškovice
(hereafter "we", "our" or "us")

Controller's contact person:

Name: Miroslav Pavelka

Phone: +420 558 426 226

Email: miroslav.pavelka@saftbatteries.com

(hereinafter the "Contact Person")

2. Basic terms

GDPR:

Regulation (EU) 2016/679 of the European Parliament and of the Council 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 effective from 25 May 2018.

Personal data:

Personal data within the meaning of Regulation (EC) 2016/679 of the European Parliament and of the Council 2016/679 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 (hereinafter "GDPR") means any information about an identified or identifiable natural person (i.e. about the data subject = you).

Special personal data:

Special personal data means information about racial or ethnic origin, political opinions, religion or philosophical beliefs or trade union membership, and the processing of genetic data or biometric data in order to uniquely identify a natural person, and data concerning health or sexual life or sexual orientation of the natural person.

Data subject = you:

The data subject is an identified or identifiable natural person, where an identifiable natural person is a natural person 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.

Processing of personal data:

The processing of personal data within the meaning of Article 4 (2) of the GDPR means 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.

Controller:

The controller within the meaning of Article 4 (7) of the GDPR means a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law; i.e. also the Company.

Processor:

The processor within the meaning of Article 4 (8) of the GDPR means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller; i.e., also some business partners of the Company, who, at the direction and according to the requirements of the Company or the Company's responsible employee perform for the Company as the controller the processing of personal data.

Supervisory Authority:

The Supervisory Authority means in the Czech Republic the Office for the Protection of Personal Data (hereinafter also the "ÚOOÚ").

Risk processing:

Risk processing means processing that is likely to result in a risk to the rights and freedoms of data subjects, the processing is not occasional, or the processing includes special categories of data or personal data relating to criminal convictions and offences referred to in Article 10 of the GDPR.

3. Personal data processed

We process identification data (name, surname), contact information (address, e-mail, telephone), data contained in the CVs of applicants, accounting data (bank account number), order and delivery history, information about complaints. We process these data in accordance with the GDPR and the Act No. 101/2000 Coll., on the protection of personal data, as amended.

4. Categories of data subjects

- a) Job applicants
- b) Customers
- c) Suppliers of goods and services
- d) Potential customers and suppliers of goods and services

5. Purpose of personal data processing

We process personal data for a clearly defined purpose:

Categories of data subjects	Purpose of personal data processing	Legal basis and personal data processed	Processing period
Job applicants	Assessing the suitability of a job applicant in the selection procedure and their re-addressing in the case of termination of the employment relationship with another selected applicant in the probationary period	<ul style="list-style-type: none"> • The legal basis is our legitimate interest. • We collect identification and contact personal data and information about the education and work experience of job applicants for the purpose of the ongoing selection procedure and their possible re-addressing in the case of termination of the employment relationship with another selected applicant in the probationary period. 	Personal data are processed for this purpose for a period of 6 months from the termination of the selection procedure or from assuming the advertised position by another selected applicant as an employee.
	Possible proof of compliance with the prohibition of discrimination and the obligation of equal treatment according to the employment	<ul style="list-style-type: none"> • The legal basis is our legitimate interest. • We collect identification and contact personal data and information about the education and work experience of job applicants for the purpose of possible demonstrating the compliance of the 	For this purpose, personal data may be processed for a period of three years from the end of the selection procedure and in the case of an ongoing procedure

	act in the selection procedure for employees	selection procedure for the employee's position with the provisions of the employment act and the prohibition of discrimination and the obligation of equal treatment.	throughout the duration of the procedure.
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Categories of data subjects	Purpose of personal data processing	Legal basis and personal data processed	Processing period
Our customers and suppliers	Performance and implementation of contracts with customers and suppliers	<ul style="list-style-type: none"> • The legal basis is the performance of contract. • The vast majority of customers are legal entities in which we process the contact information of natural persons with whom we communicate in the context of the conclusion and performance of the contract. Exceptionally, we do trade with entrepreneurial natural persons about whom we process identification data (name, surname), contact information (delivery address or permanent address, e-mail, telephone), accounting data (bank account number), information about current orders and submitted complaints. 	For this purpose, personal data may be processed for the duration of the contractual relationship .
	Making claims arising from contractual relationships after the termination of contract	<ul style="list-style-type: none"> • The legal basis is our legitimate interest. • With respect to customers, suppliers, or contact persons in legal entities, we process their identification data (name, surname), contact details (delivery address or permanent address, e-mail, telephone), accounting data (bank account number), history of orders and complaints, history of communication. These data are necessary after the termination of the contract for handling complaints, debt recovery and other obligations from the contracts entered into between us and our customers. 	For this purpose, personal data may be processed for a period of three years from the termination of the contractual relationship and if administrative or judicial proceedings are initiated, then throughout those proceedings.
	Dissemination of commercial communications in the form of e-mail newsletters containing product offerings and news	<ul style="list-style-type: none"> • The legal basis is our legitimate interest. • The processing of customer identification and contact personal data takes place in order to disseminate commercial communications in accordance with Act No. 420/2004 Coll. 	For this purpose, personal data may be processed for an indefinite period until the recipient unsubscribes.
	Performance of our obligations in the area of accounting and taxation	<ul style="list-style-type: none"> • The legal basis is the fulfilment of legal obligations imposed on us by legislation such as the Act on Accounting or the Value Added Tax Act. 	For this purpose, personal data may be processed for up to 5 years after the end of the tax

		<ul style="list-style-type: none"> We process identification data (name, surname), contact details (delivery address or permanent address, e-mail, telephone), accounting data (bank account number) and other information indicated on tax documents. 	period in which the transaction took place.
Categories of data subjects	Purpose of personal data processing	Legal basis and personal data processed	Processing period
Potential customers and suppliers	Addressing new customers and suppliers and recording the outcome of the negotiations	<ul style="list-style-type: none"> The legal basis is our legitimate interest. The vast majority of suppliers and customers are legal entities in which we process the contact information of natural persons with whom we communicate. Exceptionally, we address entrepreneurial natural persons whose contact information we collect from the web or at the recommendation of our business partners. With respect to these persons, we process identification data (name, surname), contact details (delivery address or permanent address, e-mail, telephone) and information about the outcome of the negotiations with these persons. 	For this purpose, personal data may be processed for an indefinite period (until the exercise of the right to erasure).

6. Period of personal data processing

Personal data are stored by us only for the time necessary for the purpose of their processing – see table above. After this period, personal data may be retained only for the purposes of the state statistical service and for scientific and archiving purposes.

7. Recipients of personal data and transfer of personal data outside the European Union

In justified cases, we may transfer your personal data to other entities (hereinafter the “Recipients”).

Personal data may be transferred to the following recipients:

- processors who process your personal data according to our instructions and the relationships with which are regulated according to the requirements of Article 28 of the GDPR:
 - Access to your personal data is available to the operators of the programs used by us – Minerva ČR a.s. (accounting software MFG PRO), MICROSOFT s.r.o. (Microsoft Dynamics – CRM and ERP program) – only for the purpose of management and technical support of these programs.
 - Access to your personal data is available to the operator of our electronic CRM system COGNOS – only for the purpose of system administration.
- public authorities and other entities, if required by applicable legislation;
- other entities in the event of emergency where the provision of data is necessary in order to protect life, health, property or other public interest, or if it is necessary to protect our rights, property or safety.

8. Principles of personal data processing

Lawfulness

We process your personal data in accordance with the applicable legislation, in particular with the GDPR.

Data subject consent

We process personal data only in the manner and to the extent which you have given us consent to if the consent is the ground for processing.

Minimisation and restriction of personal data processing

We process personal data only to the extent necessary to achieve the purpose of their processing and for no longer than necessary for achieving the purpose of their processing.

Accuracy of processed personal data

We process personal data with an emphasis on their accuracy. We keep the processed personal data up to date using reasonable resources.

Transparency

Through this Policy and the contact person, you have the opportunity to get acquainted with the manner we process your personal data, as well as with their scope and content.

Purposeful restriction

We process personal data only to the extent necessary for the fulfilment of the specified purpose and in accordance with that purpose.

Security

We process personal data in a manner that ensures their proper security, including their protection by appropriate technical or organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage.

9. Automated individual decision-making and profiling

During the processing of personal data, **there is no** automated, individual decision-making, even based on profiling.

Automated individual decision-making including profiling generally means any form of decision based on automated processing of personal data, i.e. without human intervention, consisting in particular of the evaluation of certain personal aspects relating to a data subject, in particular to analyse, estimate or predict aspects concerning that subject's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

10. Your rights as a data subject

Right of access to personal data

You have the right to request from us access to personal data relating to your person. In particular, you have the right to receive a confirmation from us, whether the personal data relating to you are processed by us, and to receive further information about the processed data and the processing method within the meaning of the relevant provisions of the GDPR (purpose of processing, categories of personal data, recipients, planned period of retention, the existence of your right to request rectification, erasure, restriction of processing or the right to object, the source of the personal data and the right to lodge a complaint). If you request it, we will provide you with a copy of the personal data we process about you, free of charge. In the case of a repeated request, we may charge a reasonable fee for providing a copy corresponding to the administrative costs of processing.

To gain access to your personal data please use the contact person.

Right to revoke consent to the processing of personal data, if the processing takes place on the basis of consent

You have the right to revoke your consent to the processing of personal data that are processed by us on the basis of the consent.

You can revoke your consent through the contact person.

Right to rectification, restriction or erasure

If you find that the personal data held by us about you are inaccurate, you may request us to correct these data without undue delay. If it is appropriate with regard to the specific circumstances of the case, you may also request completion of the data that we maintain about you.

You may request rectification, restriction of processing or erasure of data through the contact person.

Right to erasure of personal data

You have the right to request us to erase without undue delay the personal data processed by us that relate to you in the following cases:

- if you revoke your consent to the processing of personal data, and we have no other legitimate reason for their processing, which would prevail over your right to erasure;
- if you object to the processing of personal data (see below);
- your personal data are no longer needed for the purposes for which we have collected or otherwise processed them;
- the personal data have been unlawfully processed by us;
- the personal data have been collected by us in relation to the offer of information society services to a person under the age of 18 years;
- the personal data must be deleted to comply with a legal obligation laid down in the European Union law or the Czech law applicable to us.

You can request deletion in the above cases through the contact person.

The right to request deletion of personal data does not apply in a situation where the processing is necessary

- for exercising the right to freedom of expression and information;
- to comply with our legal obligations;
- for reasons of public interest in the area of public health;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, if it is likely that the erasure of data would render impossible or seriously impair the achievement of the objectives of that processing;
- for the establishment, exercise or defence of legal claims.

Whether there are reasons for the inability to exercise the right to erasure can be found through the contact person.

Right to restriction of the processing of personal data

You have the right to restriction of the processing of your personal data in cases where:

- you deny the accuracy of the personal data. In this case, the restriction applies for a period enabling us to verify the accuracy of the personal data.
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead.
- We no longer need your personal data for the purposes for which we processed it, but you require them for the establishment, exercise or defence of legal claims;
- you object to the processing (see below). In this case, the restriction applies until it is verified whether our legitimate grounds override your legitimate grounds.

During the time when the processing of personal data is restricted, we may process your personal data (with the exception of their storage) only with your consent or for the establishment, exercise or defence of our legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. As mentioned above, you may request restriction of processing through the contact person.

Right to object to processing

You have the right to object to the processing of your personal data in the following cases:

- In the case that personal data are processed because the processing is necessary for the performance of a task carried out in the public interest or in the exercise of public authority entrusted to us or for the purposes of our legitimate interests and you object to the processing, we may no longer process the personal data, unless we demonstrate

compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of our legal claims.

- Where personal data are processed for direct marketing purposes and you object to the processing, we will no longer process the personal data for this purpose.
- If your personal data are processed for scientific or historical research purposes or statistical purposes, we will no longer process them, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

You can lodge the objection with the contact person.

Right to data portability

In the case that we process your personal data based on your consent or because it is necessary for the performance of a contract concluded between us, you have the right to obtain from us the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format, if the personal data are processed by us in this way. You have the right to transfer these data to another data controller or to require us to provide the data directly to another data controller where technically feasible.

To obtain your personal data, please contact the contact person.

Right not to be subject to any decision based solely on automated processing, including profiling

We do not currently use personal data for automated decision-making. Otherwise, you have the right not to be subject to any decision based solely on automated processing, including profiling, which has legal effects for you or significantly affects you in a similar manner.

This does not apply if:

- the automated decision-making is permitted by a legal regulation;
- the automated decision-making is necessary to conclude or perform a contract between us;
- you have granted your explicit consent to automated decision-making.

Right to obtain information about a breach of your personal data security

If it is likely that a breach of our security would result in a high risk for your rights and freedoms, we will notify you of the breach without undue delay. If appropriate technical or organisational measures have been used for the processing of your personal data that ensure, for instance, their incomprehensibility for an unauthorised person or if we ensure by additional measures that no high risk occurs, we do not need to provide you with the information about the breach.

Right to lodge a complaint with the Supervisory Authority

If you believe that the processing of your personal data violates the obligations stipulated in the GDPR, you have the right to lodge a complaint with the Supervisory Authority. The Supervisory Authority in the Czech Republic is the Office for Personal Data Protection.

Office for Personal Data Protection

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Data box: qkbaa2n

www.uouu.cz

This Privacy Policy is effective from 25 May 2018