

# PERSONAL DATA PROCESSING STATEMENT

Statement on personal data processing pursuant to 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 instruction of data subjects (the “GDPR”).

## I. Personal Data Controller

KABEL TRADE PRAHA s.r.o., with its registered office at Dobronická 1257, 148 00 Prague 4, Company ID No.: 25613383, VAT ID No.: CZ25613383, registered since 1 October 1997 in the Commercial Register maintained by the Municipal Court in Prague, Section C, File 54856 (the “Controller”), hereby informs you, in accordance with Article 12 of the GDPR, about the processing of your personal data and about your rights.

## II. Scope of Personal Data Processing

Personal data are processed to the extent in which the relevant data subject has provided them to the Controller in connection with entering into a contractual or other legal relationship with the Controller, or to the extent in which the Controller has otherwise collected them and processes them in accordance with applicable legal regulations or for the fulfilment of the Controller’s legal obligations.

## III. Sources of Personal Data

- directly from data subjects: registration and purchases through the e-shop, personal or written communication including e-mail communication, telephone communication, business cards;
- publicly accessible registers, lists and records: the Commercial Register, the Trade Register and the Insolvency Register.

## IV. Categories of Personal Data Subject to Processing

- address and identification data used for the clear and unambiguous identification of the data subject: name, surname, title, address, Company ID No., VAT ID No., personal identification number, date of birth and permanent residence address;
- data enabling contact with the data subject: contact address, telephone number, mobile phone number, fax number and e-mail address;
- other data necessary for the performance of a contract, including bank details;
- data provided beyond the scope of applicable laws and processed on the basis of consent

granted by the data subject, such as processing of photographs or use of personal data for recruitment procedures.

## V. Categories of Data Subjects

- customers of the Controller;
- suppliers of the Controller;
- employees of the Controller;
- carriers;
- service providers;
- other persons in a contractual relationship with the Controller;
- job applicants.

## VI. Categories of Recipients of Personal Data

- processors acting on the basis of authorisation by the Controller and a concluded data processing agreement;
- state and other authorities where this is necessary for the fulfilment of legal obligations laid down by applicable legal regulations;
- other recipients, including transfers of personal data abroad to EU countries.

## VII. Purpose of Personal Data Processing

- purposes included in the consent granted by the data subject;
- negotiation of a contractual relationship;
- performance of a contract;
- legitimate interest of the Controller, including recovery of the Controller’s receivables and offering products and services.

If you are our existing customer, we may contact you to a limited extent even without your consent in connection with offers of our products and services that are related to products or services you already use from us. Such contact may be made through various channels, in particular by telephone, by post or by electronic means, including e-mail. In this situation, we process personal data only to a limited extent, usually only identification data and electronic contact details.

- archiving carried out on the basis of law;
- recruitment procedures for vacant positions;
- fulfilment of legal obligations by the Controller.

## VIII. Method of Processing and Protection of Personal Data

Personal data are processed by the Controller. Processing is carried out at the Controller’s registered office by individual authorised employees of the Controller, or, where applicable, by a processor.

Processing is carried out using computer technology and, where applicable, also manually for personal data in paper form, while observing all security principles for the administration and processing of personal data. For this purpose, the Controller has adopted technical and organisational measures to ensure the protection of personal data, in particular measures preventing unauthorised or accidental access to personal data, their alteration, destruction or loss, unauthorised transfers, unauthorised processing, as well as any other misuse of personal data. All entities to which personal data may be disclosed respect the right of data subjects to privacy protection and are obliged to proceed in accordance with applicable legal regulations concerning personal data protection.

#### **IX. Period of Personal Data Processing**

In accordance with the periods specified in the relevant contracts, in the Controller's records management and shredding rules, or in applicable legal regulations, personal data are processed for the period strictly necessary to ensure the rights and obligations arising both from the contractual relationship and from applicable legal regulations.

#### **X. Information for Data Subjects**

The Controller processes personal data with the consent of the data subject, except in cases stipulated by law where the processing of personal data does not require the consent of the data subject. In accordance with Article 6(1) of the GDPR, the Controller may process the following personal data without the consent of the data subject where: processing is necessary for the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject prior to entering into a contract; processing is necessary for compliance with a legal obligation to which the Controller is subject; processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller; or processing is necessary for the purposes of the legitimate interests pursued by the Controller, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject requiring the protection of personal data. The Controller does not carry out decision-making based on automated processing, including profiling.

#### **XI. Rights of Data Subjects**

In accordance with Article 12 of the GDPR, the Controller shall, upon request, provide the data subject with information on the processing of their

personal data, including in particular the purpose of processing, the category of personal data concerned, the recipients or categories of recipients to whom the personal data have been or will be disclosed, the planned period for which the personal data will be stored, and all available information on the source of the personal data.

Any data subject who discovers or believes that the Controller or processor is processing their personal data in a manner that is contrary to the protection of the data subject's private and personal life, or contrary to law, in particular where the personal data are inaccurate with regard to the purpose of their processing, may request an explanation from the Controller and may require the Controller to remedy the situation. Such remedy may include, in particular, blocking, correction, completion or erasure of personal data. If the data subject's request is found to be justified, the Controller shall remedy the defective situation without delay. If the Controller does not comply with the data subject's request, the data subject has the right to contact the supervisory authority directly, namely the Office for Personal Data Protection. This does not prejudice the data subject's right to contact the supervisory authority directly. The Controller is entitled to request reasonable reimbursement for providing information, not exceeding the costs necessary to provide such information.

**This information on personal data processing is valid and effective as of 25 May 2018. The current version of this document is published on the website [www.ktp.cz](http://www.ktp.cz) and this statement is publicly accessible on the Controller's website.**