

**INFORMATION MEMORANDUM ON THE PROCESSING OF PERSONAL DATA
OF THE COMPANY
KŠD ECONOMIC, a.s.**

(A) INTRODUCTORY PROVISIONS

1. PURPOSE OF INFORMATION MEMORANDUM ON THE PROCESSING OF PERSONAL DATA

- 1.1 The company **KŠD ECONOMIC a.s.**, Hvězdova 1716/2b, Nusle, 140 00 Praha 4, identification number: 279 52 266 (the “**Company**” “**We**”) hereby issues for persons, whose personal data are processed by the Company (therefore, namely for its customers (clients), business partners, seekers for jobs in the Company, and for visitors of the website of the Company) the following information memorandum on the processing of personal data (the “**Memorandum**”).
- 1.2 The purpose of this Memorandum is to inform you as data subjects (“**You**”) of the processing of your personal data carried out by the Company, as the controller, and of your rights related to such processing.
- 1.3 This Memorandum relates only to such processing of your personal data that is carried out by us ourselves (the Company itself), as the controller of personal data, or for us (for the Company), as the controller of personal data, by another person (the “processor of the personal data”).
- 1.4 This Memorandum may be changed and amended by the Company. The current wording of this Memorandum is available at the following website: www.ksd.cz. We recommend that You should regularly obtain information of the current wording of the Memorandum.

2. CONTACT DETAILS OF COMPANY

- 2.1 If You have any questions related to the matters of the processing of your personal data and their protection, contact us through the following contact details:
- telephone number +420 221 412 611; and
 - email address osobni-udaje@ksd.cz.

3. DATA PROTECTION OFFICER

- 3.1 In accordance with requirements of the relevant legal regulations, We designated a data protection officer whom You can contact in all matters related to the processing of your personal data and exercise of your rights.
- 3.2 Marie Horová was designated the data protection officer.
- 3.3 The data protection officer may be contacted through the following contact details:
- telephone number +420 221 412 611; and
 - by email to email poverenec.kse@ksd.cz.

4. TECHNICAL TERMS

- 4.1 If it is not stated in this Memorandum expressly otherwise, technical terms used in this Memorandum have the following meaning:

“sensitive data”	means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation, and data on criminal activities;
“cookies”	means text (data) files containing small amounts of the information (data) that are within visits of website stored in a user's computer, mobile phone or other equipment. Subsequently, within the next visit of the website, cookies are sent back to the website (or other sites) that identify cookies; therefore, they enable to the website to identify the user's computer, mobile phone, or other equipment;
“hash”	means a digital footprint of the specific behaviour of the website user included in cookies;
“personal data”	means any information of your person that identifies You or permits direct or indirect identification of your person;
“recipient”	means a natural or legal person (another company), public authority, agency or another body, to which your personal data are disclosed (e.g. a tax office or social security administration);
“controller” or “controller of personal data”	means a person who determines the purposes and means of the processing of the personal data. In the case of the processing of your personal data to the extent stated in this Memorandum, the controller of your personal data is the Company;
“data subject”	means your person, as a natural person, to whom the personal data relates;
“third country”	means another state than the Member State of the European Union, Iceland, Norway, and Lichtenstein;
“website user”	means the visitor of the Company's website;
“website of the Company”	means www.ksd.cz ;
“processing” or “processing of personal data”	means any manner of handling personal data, 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; and
“processor” or “processor of personal data”	means a natural person or a legal person, agency, or another body that is processing personal data for the Company.

(B) COMPLIANCE WITH LEGAL REGULATIONS AND BASIC PRINCIPLES OF PROCESSING

5. COMPLIANCE WITH LEGAL REGULATIONS

5.1 The protection of your personal data is our priority; therefore, when processing your personal data, We observe all obligations and fulfil all requirements defined by the relevant legal regulations in the area of the protection of personal data.

6. BASIC PRINCIPLES OF PROCESSING OF PERSONAL DATA

6.1 When processing personal data, We observe the following basic principles of the processing of personal data.

Principle of lawfulness, fairness, and transparency

6.2 Your personal data are processed fairly and in a lawful and transparent manner.

Principle of purpose limitations

6.3 We collect (and process) your personal data only for specified, explicit and legitimate purposes, and not in a manner that is incompatible with these purposes.

Principle of data minimisation

6.4 We process your personal data only to the extent that is adequate, relevant and necessary for purposes of the processing of your personal data.

Principle of accuracy

6.5 We process only the accurate personal data and, if necessary, We update your personal data.

Principle of storage limitation

6.6 We process (store) your personal data only for the time that is necessary considering purposes of the processing of your personal data or the time defined by the relevant legal regulations.

Principle of integrity and confidentiality

6.7 We process your personal data only in a manner that ensures appropriate security of your personal data against unauthorized or unlawful processing and against accidental loss, destruction or damage.

Principle of accountability

6.8 We are responsible for the above-stated principles of processing and compliance of the processing of your personal data with legal regulations.

(C) EXTENT OF PROCESSING OF PERSONAL DATA

7. PERSONAL DATA (CATEGORIES OF PERSONAL DATA)

7.1 In general, the Company processes the following personal data on data subjects (categories of personal data); however, in relation to the specific data subject always depending on the character of the relationship between the Company and the relevant data subject (therefore, whether it is a customer (client) of the Company, seeker for a job in the Company or other data subject, whose personal data are processed by the Company) and depending on the specific position of the relevant data subject (e.g., whether it is a customer (client) of the Company whom the Company provides with services of accounting and/or payroll administration and/or tax consultancy).

Identification data

- (a) data used for the identification of a certain person, namely an academic degree, name, surname, date of birth, birth number, data on identity documents, data on occupation, office, ID card no., passport, visa, etc.;

Contact data including electronic

- (b) data used for contacting and communicating with a certain person, namely a telephone number, email address, identifiers in communication platforms (e.g. Skype, WhatsApp), the address of a permanent residence or a temporary residence or another address;

Verification (authentication) data

- (c) data used for secure verification of identity of a certain person, namely first name, surname or login, password, PIN, chip of a card and other electronic authentication items, further a licence plate of a motor vehicle;

Payment data

- (d) data used for making payments, namely a bank account number;

Data on other persons

- (e) data on family members (first name, surname, number of children, birth numbers, telephone contact);

Data on health status

- (f) data concerning your health status and potential health restrictions;

Data on legal claims

- (g) data on your claims towards the Company and claims of the Company towards You following from the contractual and non-contractual relationship between You and the Company, such as data on your claim to the compensation for damage against the Company or data on a claim of the Company towards You, e.g. on the basis of a contractual penalty or unpaid price of goods;

Audio-visual data

- (h) data captured in the form of audio-visual recordings, namely photographs, video recordings, audio (voice) recordings;

Basic profile data

- (i) data on your basic physical characteristics (sex, age, etc.) and your basic social-demographic characteristics (sex, state citizenship, personal (family) status, number of children, etc.);

Data on property situation

- (j) data on your property situation, economic credibility, and your payment ethics, including your property situation and data on your potential indebtedness, if they are important for a contractual relationship that You have with the Company;

Contractual data

- (k) data on products or services supplied to You by the Company, on related requirements, complaints, claims, service requirements, including data on your communication with the Company, and other related data;

Professional profile data

- (l) data on education received by You and professional qualifications, namely they are data stated in your CVs;

Data on criminal activities

- (m) data concerning judgments in criminal matters, if it is necessary for the performance of work or if it is required by another legal regulation;

IP address

- (n) data on your equipment from which You visit the website of the Company;

Hash

- (o) data obtained through cookies concerning your behaviour on the website of the Company;

Other data

- (p) it is possible that, in relation to You, We are also processing other personal data that are not stated here explicitly; nevertheless, they will be personal data necessary for the fulfilment of purposes stated in this Memorandum.

(D) PROCESSING OF PERSONAL DATA

8. SOURCES OF PERSONAL DATA PROCESSED

8.1 We acquire your personal data from several sources. The primary source of your personal data is You in person (e.g. when We enter with You into an agreement on the provision of services of accounting and/or payroll administration and/or tax consultancy and, for this purpose, You hand over to us your identification data or payment data). We also obtain your personal data from resources available to the public, such as public lists, registers, and registries (e.g. the Commercial Register or Trade Licence Register), or social media networks. We may obtain your personal data also from third parties, such as public authorities, executor offices.

8.2 The source of personal data on website users of the Company are (may be) to the significantly restricted extent also cookies acquired by the Company in connection with activities of website visitors of the Company's website – You will find more detailed information in our Notice on cookies.

8.3 If You are interested in a specific source of the processing of your personal data, You can address us with this question.

9. LEGAL REASONS AND GROUNDS FOR PROCESSING OF PERSONAL DATA

9.1 We process your personal data on the basis of the following legal grounds:

- i. on grounds of performing an agreement that You entered into with our Company;
- ii. on grounds of performing legal obligations defined to the Company by legal regulations;
- iii. on grounds of legitimate interests of the Company or third parties;
- iv. on the basis of your consent, if You provided us with consent to the processing of your personal data; and
- v. in exceptional situations, We may process personal data also on grounds of protecting your vital legitimate interests or vital legitimate interests of another natural person.

9.2 We process your personal data only for purposes stated in this Memorandum. If We process your personal data for other purposes than those stated below in the future, We will inform You of this fact immediately through an update of this Memorandum or in another appropriate manner.

9.3 If You are interested in a specific legal title related to the processing of your personal data, You can address us with this question.

A. *Processing of personal data on grounds of the performance of an agreement between the Company and You*

9.4 If You entered into an agreement with us, the processing of your personal data is based in particular on such an agreement (e.g. the provision of services of accounting and/or payroll administration and/or tax consultancy). Without the processing of your personal data, it would not be possible to enter into said agreement and perform the relevant agreement subsequently.

9.5 We process your personal data on the basis of these legal grounds for the following purposes:

Contractual matters

- (a) The purpose of contractual matters includes the processing of personal data for purposes of entering into contractual relationships with the Company, their changes, and termination (including pre-contractual negotiations), performance of rights and obligations from an agreement entered into, including keeping records on such contractual relationships and related communication between You and the Company, etc.

B. *Processing of personal data on grounds of performing legal obligation*

9.6 We further process your personal data, because We are required to do so by the relevant legal regulations, e.g. within tax and bookkeeping matters or within archiving.

We process your personal data on the basis of these legal grounds for the following purposes:

Tax matters

- (a) This concerns the processing of personal data for purposes of tax matters, for purposes of preparation, processing, and submission of tax returns, tax statements, and other tax reports, communication with the relevant authorities of state administration and performance of other obligations defined by tax regulations.

Accounting matters

- (b) This concerns the processing of personal data for purposes of bookkeeping and carrying out bookkeeping audits, performing registration and recording obligations, performing

obligations in relation to reporting, communication with the relevant authorities of public administration, and performing other obligations defined by accounting regulations.

Archiving

- (c) This concerns the processing of personal data on grounds of the performance of archiving obligations defined by the relevant legal regulations, namely the act on archiving and filing services, tax regulations, or accounting regulations.

Audits

- (d) The processing of personal data on grounds of enabling obligatory audits in the Company, e.g. accounting, tax, etc.;

Cooperation with public authorities

- (e) The processing of personal data on grounds of the provision of the obligatory information to public authorities, e.g. law enforcement authorities, financial administration, etc., if they are included in the information that We are obliged to provide to such authorities.

C. Processing of personal data on the basis of legitimate interests

- 9.7 We further process your personal data also on the basis of the “legitimate interests” of the Company; however, always under the condition that your interests or fundamental rights and freedoms, requiring the protection of personal data, do not have priority over such legitimate interests.

We process your personal data on the basis of these legal grounds for the following purposes:

Accounting and payroll administration and tax consultancy

- (a) This concerns the processing of personal data for purposes accounting, tax records, payroll administration, and tax consultancy for clients of the Company.

Efficient governance of the Company

- (b) This concerns the processing of personal data for purposes of ensuring the efficient governance of the Company, namely for purposes of the organization and management of the Company, definition and achievement of objectives of the Company, ensuring administrative processes within the Company, or to a limited extent within business grouping the part of which is the Company (the “**KŠD Group**”), and the performance of obligations in the area of *compliance* (thus in the area of ensuring legal compliance of activities and processes with requirements of legal regulations). This legitimate interest of the Company is the interest of the Company to ensure the effective management and governance of the Company.

Marketing and promotion

- (c) This concerns the processing of personal data for purposes of promotion of the Company and their services, including potential obtaining of audio-visual data (namely photographs) and their use within promotional materials of the Company. This legitimate interest of the Company is the interest of the Company in the development of the Company’s business, promotion of the Company’s services, maintaining and expanding the client portfolio.

Protection of legal interests (claims) of the Company

- (d) This concerns the processing of personal data in relation to the protection of legal claims and interests of the Company protected by law whether the Company asserts claims against You, or the Company is protecting itself against claims asserted by You in an out-of-court settlement, a court proceeding, or an execution proceeding. In this case, the legitimate interest of the Company is the interest of the Company in protecting its rights and interests; therefore, the assertion of the Company's claims against third parties, and in ensuring the protection of the Company against claims asserted against it.

Security and protection

- (e) This concerns the processing of personal data to ensure security in the Company including IT and network security and the protection of assets of the Company and assets of other persons. For this purpose, the Company has security systems in the form of registration of access to the premises of the Company and security camera system located in the Company's offices. In this case, the legitimate interest of the Company is the protection of assets of the Company and third parties and ensuring the security of persons in the premises of the Company. The legitimate interest is in this case also the Company's interest in ensuring IT and network security.

Recruitment of new employees

- (f) We process personal data of seekers of employment in the Company also for purposes of recruiting new employees of the Company; therefore, accepting, processing, and filing resumes, selecting job applicants, holding employment related interviews, evaluating job applicants, offering jobs in the Company, and communicating with job applicants within the whole recruitment process. The legitimate interest of the Company is in this case the recruitment of new employees of the Company; therefore, the effective operation of the Company.

We further process personal data of seekers of employment in the Company for purposes of maintaining a database (register) of seekers of employment in the Company within which We register personal data of selected unsuccessful seekers of employment in the Company in relation to whom it is probable that a new offer of employment in the Company may be made to them (e.g. for a reason that the Company will establish a new position that is identical or similar to the position that the seeker sought originally or because the position that the seeker of employment sought originally was subsequently vacant). The justified interest of the Company in this case is the filling of positions in the Company that will be open in the future; therefore, the effective operation of the Company.

D. Processing of personal data on the basis of your consent

- 9.8 We process (We may process) your personal data also on the basis of your consent to their processing if You provide us with your consent to the processing of personal data. In such a case, We process the relevant personal data only for purposes of the processing of personal data to which You provide your consent.
- 9.9 The provision of your consent to the processing of personal data is absolutely voluntary; therefore, You have the right to withdraw your consent to the processing of your personal data at any time.

10. RECIPIENTS (CATEGORIES OF RECIPIENTS) OF PERSONAL DATA

10.1 In relation to the above-stated purposes, your personal data are transferred to third parties who are designated as recipients of personal data. They are companies (or natural persons) with whom the Company cooperates either as with its business partners or within the use of services of such companies, or within the fulfilment of its statutory obligations.

10.2 Such recipients of personal data may be divided into:

Recipients who are processors of personal data

- (a) Processors of your personal data are third parties, whom the Company uses for its own purposes, and who process your personal data exclusively for the Company (e.g. suppliers of software and IT systems, personnel agencies).

We select only such processors who provide sufficient guarantees for the implementation of appropriate technical and organizational measures necessary for purposes of ensuring the protection of your personal data.

The written agreement on the processing of personal data is always entered into with processors, and the subject of this agreement is the regulation of conditions of involvement of a processor in the processing of your personal data, regulation of related obligations of processors, all the above for purposes of ensuring the relevant protection of your personal data.

Recipients who are (independent) controllers of personal data

- (b) Those recipients are in the position of independent controllers, and they process your personal data for their own purposes. They are primarily public authorities and further, e.g. certain business partners of the Company.

No special agreement on the processing of your personal data is entered into with such recipients of your personal data, because those persons have the same obligations as the Company in relation to the processing of your personal data; therefore, they themselves are liable for the processing of your personal data.

10.3 The summary with recipients (categories of recipients) to which your personal data are provided by the Company are in schedule no. 1 of this Memorandum.

11. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

11.1 Your personal data are not normally transferred to third countries. Therefore, your personal data are transferred to third countries only in exceptional cases when such a transfer is absolutely necessary (namely then in the case that it is required by the provision of certain service to a customer (client) of the Company).

11.2 However, your personal data are transferred in the following exceptional cases by the Company to third countries only if some of the following conditions are fulfilled:

- (a) under a condition that personal data are transferred to a third country in relation to which the European Commission issued a decision on the appropriate protection of your personal data, i.e. to a third country that the European Commission assessed as a secure country from the perspective of the protection of your personal data (the “**Decision on Appropriate Protection**”);
or

(b) if, in relation to the relevant third country, the European Commission did not issue the Decision on Appropriate Protection, then:

- (i) under a condition that a recipient of personal data (therefore, a person to whom personal data are transferred) provides appropriate safeguards of personal data protection the most frequently through standard data protection clauses adopted by the European Commission that are entered into with the relevant recipient (the “**Transfer Based on Appropriate Safeguards**”); or (in the event of the non-existence of such appropriate safeguards);
- (ii) upon the fulfilment of conditions defined by the relevant legal regulations in the area of the protection of personal data, namely if (1) the transfer of personal data to a third country is required for the fulfilment of an agreement between the Company and You or the Agreement entered into to the benefit of your person, or (2) the transfer is required for the definition, performance, or defence of legal claims, or (3) You provided your explicit consent to the above.

12. STORAGE (PROCESSING) PERIOD OF PERSONAL DATA

12.1 We process (store) your personal data only for the time that is necessary considering purposes of the processing of your personal data.

12.2 In the event of processing your personal data on the basis of statutory obligations, We process your personal data for the time defined by legal regulations, namely tax and accounting regulations.

12.3 If We perform an agreement, We process your personal data for the time of duration of a contractual relationship between You and the Company and further for subsequent ten (10) years after the termination of this contractual relationship, namely considering the potential future claims towards You or from You towards the Company.

12.4 In the event of the processing of your personal data on the basis of the Company’s legitimate interest, We process your personal data for the adequate (necessary) time considering the relevant legitimate interest – You will find more detailed information of the relevant period of processing (storage) in schedule no. 2 of this Memorandum.

12.5 In the event of granting consent to the processing of personal data, We process your personal data for the time stated in such consent.

13. LINKS TO OTHER WEBSITES

13.1 If links to websites operated by third parties are presented on the website of the Company, websites of third parties are absolutely independent, and they are outside any control of the Company. Therefore, the Company is not liable in any manner for the content of any websites of third parties that You can access through links presented on the website of the Company, and the Company is not liable in any manner whatsoever for their content, compliance with principles of the protection of personal data, or their use.

14. USE OF PLUG-IN MODULES FOR SOCIAL NETWORKS

14.1 The website of the Company uses plug-in modules of various social networks. The plug-in module of a social network is a button intended for sharing posts from the website of the Company and other users of the relevant social network.

14.2 On our website, We use plug-in modules of the following social networks.

Twitter

(a) This plug-in module is operated by the company Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, U.S.A. the plug-in module is marked with the Twitter logo. The information on principles of the protection of personal data of the Twitter company is on the twitter.com website.

14.3 Design and content of plug-in modules in a browser is specified by those social networks. The modules are automatically integrated in the website.

14.4 If You visit any of the websites of the Company through one of those plug-in modules, your web browser (e.g. Internet Explorer) will automatically create a link to a server of the relevant social media network regardless of the fact whether You used a plug-in module. The information of the fact that You visited the website of the Company is then shared through that link.

14.5 If, during the visit at the website of the Company, You are logged in to some of the social media networks, data transferred will be allocated to your user account at the social media network. This is also applicable in the event if You use a plug-in module.

(E) YOUR RIGHTS

15. GENERAL INFORMATION

15.1 This part of the Memorandum contains the information on your rights related to the processing of personal data carried out by the Company or for the Company.

15.2 However, in this regard, We also state that your certain rights related to the processing of personal data may be restricted considering the statutory obligation defined of a tax consultant to maintain confidentiality of all facts of which said tax consultant has learned in relation to the provision of services of tax consultancy.

16. RIGHT TO WITHDRAW CONSENT TO PROCESSING OF PERSONAL DATA

16.1 If We process your personal data on the basis of your consent, You have the right to withdraw your consent to the processing of your personal data at any time in any of the manners stated in part (F) below.

16.2 You can withdraw your consent to the whole or certain extent or only partially only in relation to some of your personal data or in relation to some of the grounds of processing.

17. RIGHT TO ACCESS PERSONAL DATA

17.1 You have the right to obtain from the Company a confirmation of the fact whether We process your personal data or not.

17.2 If We really process your personal data, You have the right to have access to your personal data and the right to receive the information stated in this Memorandum.

17.3 We will provide You with access to personal data processed in a manner that We will provide You with a copy of personal data processed. The provision of the first copy is free of charge. We may charge an adequate fee (considering administrative costs spent) for the provision of further copies upon your request.

17.4 The Company will provide You with the above-stated confirmations, information, and copies in the written or electronic form. However, if You file a request in the electronic form, confirmations, information, and copies will be provided to You in the electronic form, unless You request another form.

18. RIGHT TO RECTIFICATION AND COMPLETION OF PERSONAL DATA

18.1 You have the right to obtain from us the rectification of inaccurate personal data concerning You without undue delay. Considering purposes of processing, You also have the right to the completion of incomplete personal data also based on the provision of an additional statement.

19. RIGHT TO ERASURE (“RIGHT TO BE FORGOTTEN”)

19.1 You have the right to obtain from us the erasure of your personal data without undue delay if:

- i. your personal data are not necessary for purposes for which they were collected or otherwise processed by the Company;
- ii. You withdraw your consent to the processing if We process your personal data on the basis of your consent and if any other legal ground for processing your personal data does not exist;
- iii. You raise objections against the processing of your personal data, and also no overriding legitimate grounds for the processing exist;
- iv. You raise objections against the processing for purposes of direct marketing;
- v. We processed personal data unlawfully; or
- vi. Your personal data must be erased in order to perform legal obligations defined by the relevant legal regulations by which We are bound.

19.2 In the event of exercising the right to erasure and meeting conditions of such erasure, We will erase your personal data without undue delay, if We do not need your personal data for the performance of a legal obligation, for the establishment, exercise or defence of legal claims or for purposes of archiving.

19.3 If your personal data were published, taking into account technology available and costs of performance, We will take adequate steps, including technical measures in order to inform other controllers who process personal data that You have requested erasure of your personal data.

20. RIGHT TO RESTRICTION OF PROCESSING

20.1 You have the right to obtain from us the restriction of the processing of your personal data in the following events:

- (a) You will contest the accuracy of your personal data for a period enabling us to verify the accuracy of the personal data;
- (b) the processing of your personal data is unlawful, and You will oppose the erasure of the personal data and You will request the restriction of their use instead;
- (c) We will no longer need your personal data for the purposes of the processing, but You will require them for the establishment, exercise or defence of legal claims; or

- (d) You will object to processing (see more details in Article 22 stated below) pending the verification whether our legitimate grounds override your legitimate grounds.
- 20.2 If the processing of your personal data is restricted upon your request, your personal data, except their storage, may be processed by the Company only with your consent or on grounds of the establishment, exercise or defence of legal claims, on grounds of the protection of rights of another natural or legal person or on grounds of important public interest.
- 20.3 If the processing of your personal data is restricted upon your request, We will inform You of the potential reversal of the restriction of the processing.
- 21. RIGHT TO DATA PORTABILITY**
- 21.1 You have the right to request us to transfer your personal data (that You have provided to us yourself) to another controller (i.e. a company that You will specify yourself); however, only in the following cases:
- (a) the processing of your personal data is established on your consent or the performance of an agreement between the Company and You; and (also);
 - (b) the processing is carried out by the Company automatically (not manually).
- 22. RIGHT TO OBJECT**
- 22.1 For grounds related to your specific situation, You have the right to object to the processing of your personal data based on your legitimate interest at any time.
- 22.2 If You exercise this objection, We will not process your personal data further, unless (a) We demonstrate serious justified grounds for such processing that would override your interests or rights and freedoms, or (b) it would be necessary for the establishment, exercise, or defence of legal claims.
- 22.3 Further, You have the right to object to the processing of your personal data for purposes of direct marketing – if You exercise this objection, We will not continue with the processing of your personal data in any case.
- 23. RIGHT TO COMPENSATION**
- 23.1 In relation to the Company, You have the right to compensation for all (material or non-material) damage that is caused to You by breaching the Company’s obligations in the area of processing and protecting personal data; therefore, the Company is obliged to compensate You for damage suffered. The Company is also liable for damage caused to You by processors to which the Company transmitted your personal data.
- 24. RIGHT TO LODGE COMPLAINT WITH SUPERVISORY AUTHORITY**
- 24.1 If You have doubts on lawful processing of your personal data or if the Company does not comply with your request related to your personal data, You have the right to address the Office for Personal Data Protection as the supervisory authority in the area of personal data protection.
- 24.2 You can address the Office for Personal Data Protection with your suggestion without the prior request addressed to the Company as well.
- 24.3 If the Office for Personal Data Protection does not comply with your complaint, if it does not handle said complaint at all, or if it does not inform You within three months on the progress in handling your

complaint, You have the right to judicial redress against such steps taken by the Office for Personal Data Protection.

25. RIGHT TO JUDICIAL REDRESS

25.1 If You have doubts on lawful processing of your personal data or if You find breaches of your rights in relation to the processing of your personal data, You have the right to effective judicial redress.

(F) MANNER OF EXERCISING RIGHTS OF DATA SUBJECTS AND HANDLING REQUESTS OF DATA SUBJECTS

26. MANNER OF EXERCISING RIGHTS OF DATA SUBJECTS

26.1 You may make requests or lodge complaints in the matter of your rights in relation to the processing of personal data by the Company (the "Request(s)") with the Company through:

- telephone number +420 221 412 611;
- email address osobni-udaje.kse@ksd.cz; or
- Officer of the Company.

27. HANDLING REQUESTS OF DATA SUBJECTS

Handling request free of charge

27.1 If it is not explicitly stated in this Memorandum otherwise, your Requests are handled and any subsequent measures are taken free of charge.

Requirements of request

27.2 It must be clear from your Request that You are making the relevant Request and the subject of your Request. The Company may ask You for more detailed specification of the Request or its grounds.

Acceptance of request of data subject

27.3 If your Request is filed through email, its acceptance will be confirmed to You without undue delay by the Company depending on the manner of filing the Request by email or in another appropriate manner.

Manifestly unfounded or excessive requests

27.4 Manifestly unfounded or excessive Requests (in particular repeated Requests) may be subject to a charge of an adequate fee (considering administrative costs) or rejected.

Handling requests of data subjects

27.5 Requests are handled without delay and in every case within one (1) month from the date of accepting the Request.

27.6 In exceptional cases (namely taking into account complexity and number of all Requests handled), this term may be prolonged with two (2) months at maximum. We will inform You of such an exceptional prolongation of the term for handling the Request no later than within the term of one (1) month from the date of accepting your Request together with grounds for such a suspension.

27.7 In the event of the rejection of your request, We will inform You of such a fact and also of the possibility to file a complaint at the supervisory authority and request judicial redress.

SCHEDULE NO. 1

SUMMARY WITH RECIPIENTS (CATEGORIES OF RECIPIENTS)

RECIPIENTS (CATEGORIES OF RECIPIENTS)
Advisory services (e.g. law firms or advisors in the area of accounting and tax matters), namely KŠD LEGAL advokátní kancelář s.r.o. ID No.: 257 11 229, Hvězdova 1716/2b, 140 00, Prague 4, KŠD SERVISNÍ s.r.o., ID No. 45790272, Hvězdova 1716/2b, 140 00, Prague 4, and Ing. Martin Blecha, reg. no. 00003402, Pujmanové 888/13, 140 00, Prague 4
Suppliers of services in the area of HR, namely MIKUPEX TRADE s.r.o., ID No.: 034 72 108, Ke Šmejkalu 135, 149 00, Prague 4
Suppliers of services in the area of protection of property and persons (namely security agencies), namely JABLOTRON SECURITY a.s., ID No.: 28501861, K Dubu 2328/2a, 149 00, Prague 4
Audit companies, namely AUDIT SERVIS, spol. s.r.o., ID No.: 158 88 541, Nádražní 61/116, 150 00, Prague 5
Suppliers of software systems and programs, namely Asseco Solutions a.s., ID No.: 649 49 541, Zelený pruh 1560/99, 140 02, Prague 4, and OKsystem a.s., ID No.: 273 73 665, Na Pankráci 1690/125, 149 00, Prague 4
Graphic and web studios, advertising agencies, namely e-invent s.r.o., ID No.: 27428907, Na Cihlářce 30, 150 00 Prague 5
Authorities of state administration, e.g. Employment Office, Tax Office, Law Enforcement Authorities
Banks and insurance companies, namely UniCredit Bank Czech Republic and Slovakia, a.s., ID No.: 64948242, Želetavská 1525/1, 140 92 Prague 4, Komerční banka, a.s., ID No.: 453 17 054, Na Příkopě 969/33, 114 07, Prague 1, and PLATINUM Consulting s.r.o., ID No.: 28255623, Ke Koulce 646/2, 150 00, Prague 5
Persons from the KŠD Group

SCHEDULE NO. 2

STORAGE (PROCESSING) PERIOD OF PERSONAL DATA

PURPOSE OF PROCESSING	STORAGE (PROCESSING) PERIOD OF PERSONAL DATA
Accounting and payroll administration and tax consultancy	For the time that is necessary for the purpose of the provision of services in the area of accounting, tax filing, payroll administration, and tax consultancy to clients of the Company in a due manner.
Effective management and governance of company	For 1 year from the collection of personal data.
Marketing and promotion	For the duration of a contractual relationship and for 5 years after its termination; in other cases for the time of 5 years from the collection of personal data.
Protection of legal interests (claims) of the Company	For the time of duration of a contractual relationship and for 10 years after its termination.
Security and protection	Generally, for 1 year, in the area of IT security for 6 months at maximum, and in the event of personal data processed through security camera system, for 1 month at maximum. However, in the event of a security incident, personal data may be processed for a longer period; however, always only for a period that is necessary for the clarification and solution of the relevant security incident.
Recruitment of new employees	For the time of duration of a selection process, and in the event of keeping records of seekers for employment, for the time of 3 months after the termination of a selection process.