

INFORMATION ON PROCESSING OF PERSONAL DATA OF BUSINESS PARTNERS

Personal Data Processing Policy of the Company

Protection of your personal data is important to us. This personal data protection declaration explains, what personal data does the Company collect from you and how do we use this data. All policies are in compliance with the Regulation (EU) 2016/679 of the European Parliament and of the Council (hereafter “GDPR”) and the follow-up legislation.

I. Information about the Controller

1. Your personal data **Controller** is the Company:

LYCKEBY AMYLEX, a.s., with a registered office at Strakonická 946, 341 01 Horažďovice, Company ID 49790340, registered in the Commercial Register managed by the Regional Court in Plzeň, section B, file 387.

2. **Personal data**: Personal data is each piece of information regarding an identified or identifiable natural person (data subject). An identifiable natural person is a natural person that may be directly or indirectly identified in particular by reference to a certain identifier, e.g. name, surname, permanent residence, telephone number, e-mail, etc.

3. **Data subject**: Data subject is a natural person, which the personal data relate to.

4. **Controller**: Controller is the responsible administrator of your personal data, which you provide to us in relation to a business relationship that was established between you, being the data subject, and the Company, or in relation to a business relationship that was established between the Company and the entity which you represent, or as the case may be, of personal data necessary to take certain steps before a business relationship is established in compliance with your request or a request of the entity which you represent (hereafter business relationship).

5. **Legal basis**: Legal basis for processing personal data within a business relationship may be in particular the performance of a contract according to article 6 (1) b) of GDPR or processing of personal data based on legitimate interest according to article 6 (1) f) of GDPR, for example in relation to processing and retaining contact information of the data subject, or the processing is necessary to comply with the Company’s legal obligation applicable to the company, for example in tax and customs area, in compliance with article 6 (1) d) of GDPR.

II. Processing Policy

When processing your personal data, we observe and respect the highest standards of personal data protection and comply in particular with the following principles:

1. We always process your personal data for a clearly defined purpose, by the defined means, in the defined manner and only for the time necessary with regard to the purpose of processing of the personal data concerned.

2. We only process accurate personal data and we have made provisions to make sure the processing thereof corresponds to the defined purposes and that it is necessary in order to fulfill these purposes.

3. We process your personal data in a manner that secures the highest possible safety of this data and prevents any unauthorized or random access to the personal data and any alteration, destruction, loss, unauthorized transfer, other unauthorized processing or other misuse thereof.

4. We maintain the appropriate technical and organizational measures to secure a level of security corresponding to all possible risks; all persons that come to contact with your personal data are obliged to maintain confidentiality regarding the information acquired in relation to processing of this data.

III. Purpose of Personal Data Processing

We process personal data for the purpose of entering into and performing business contracts.

IV. Processing Personal Data without Your Consent

We may process your personal data also without your consent solely for the purpose of:

- a) performing a contract made between you and us, whereas actual use of a certain service by you without the need to sign any document may also be construed as entering into a contract;
- b) fulfillment of legal obligations arising to us from the applicable legislation;
- c) processing necessary for our legitimate interests.

The possibility and legality of such processing arises directly from the applicable legislation, your consent with such processing is not required.

V. Scope of Processed Personal Data

Our company processes your personal data in the extent necessary to fulfill the above stated purposes.

We only process personal data provided to us by you, in particular:

- a) in relation to business cooperation, business cases, business or other contracts or projects between our company and you or a natural person or legal entity, which you are employed with, which you represent or which you cooperate with;
- b) in relation to visiting our website at www.lyckeby.cz;
- c) or in relation to entering our premises, warehouses and plants.

As such this most often (but not always) concerns data that you communicate to us or that we have to process by operation of law or based on the fact we pursue our legitimate interest, e.g.:

- a) name and surname;
- b) telephone number;
- c) e-mail address;
- d) permanent residence address;

e) contact or delivery address;

f) date of birth (age);

g) company identification number (IČ), or tax identification number (DIČ) in case of suppliers and business partners;

h) car license plate (in case of visitors of our premises).

VI. Term of Personal Data Processing

We process personal data only for the time necessary with regard to the purpose of processing. In this context we process personal data for the purpose of:

a) contract performance for the duration of the business relationship; thereafter the relevant personal data is usually usable for a period of ten years;

b) customer care for the duration of contractual relationship; thereafter the relevant personal data is usually usable for a period of ten years.

Furthermore, the following applies:

a) if it is stipulated by the law or another legislative act or by decision of an administrative authority, personal data must be archived for the stated purpose at least for such stipulated time period;

b) if, as the case may be, there is a possibility to use the data or if such use is required in lawsuits or other disputes or administrative or other proceedings, the data will be retained at least for a period of two years after final and effective conclusion of the given dispute or proceeding, and if no dispute or proceeding is initiated, for a period of at least two years after the lapse of the limitation or prescription period in cases, where it could be potentially applied;

c) in other cases, no less than one year after obtaining thereof and no more than five years after the last use thereof.

We have an obligation to process such personal data that is not necessary for due provision of a service, or as the case may be, for the compliance with all our obligations, be it obligations arising from contract between us or from the applicable legislation, regardless of your consent, for the time stipulated by the applicable legislation or in compliance therewith after possible withdrawal of your consent.

VII. Sources of Personal Data

We obtain personal data in particular:

a) from the clients, business partners and employees themselves directly, e.g. when entering into contract, based on selection procedures etc.;

b) from public sources (public registers, records or lists)

VIII. Personal Data Recipients

Your client's personal data is accessible in particular to our employees in relation to the fulfillment of their work tasks, where it is necessary to handle personal data, however only in the extent necessary in the given case and while observing all security precautions.

In addition, your personal data is transferred to third parties participating on personal data processing, or as the case may be, this data may be made accessible to them for other reasons in compliance with the law. The Controller is entitled to delegate personal data processing to a Processor, who has entered into a data processing agreement with the Controller and who provides sufficient guarantees for the protection of your personal data.

IX. Transfer of Personal Data

In compliance with the applicable legislation we are entitled to directly transfer your personal data without your consent to:

- a) the competent public administration authorities, courts and authorities involved in criminal proceedings in order to fulfill their duties and for the purpose of enforcement of decisions;
- b) banks and other payment services providers;
- c) other entities in the extent stipulated by the applicable legislation, e.g. third parties for the purpose of recovery of our claims.

X. Your Rights

The Company complies with the personal data protection laws applicable in the European Economic Area, which, if applicable, include the following rights:

1. If the personal data processing is based on your consent, you have the right to withdraw your consent with future processing at any time.
2. You have the right to require us, being the personal data Controller in the sense of the applicable legislation, to give you access to your personal data and make rectification thereto.
3. You have additional rights such as right to erasure, right to limitation of processing, right to portability of personal data.
4. You have the right to object against processing of your personal data.
5. You have the right to file a complaint to the Office for Personal Data Protection.

You may exercise your rights by sending an e-mail to the Controller's e-mail address: radka.cerna@lyckeby.cz

XI. CCTV Records

For the purpose of protection of property our Company monitors movement of persons through a CCTV system with recording facility. In this case the legal ground for this type of processing is **legitimate interest of the Controller**. In case the records are not assessed as necessary for the purpose of criminal, administrative or other similar proceedings, they will be continuously erased and destroyed.

XII. Contact Us

In case you have any question regarding personal data protection, withdrawal of consent with further processing of your personal data or in case of you have a complaint, you may utilize the e-mail address stated in article X. of this Policy.

This Information on Processing Personal Data of Business Partners – Personal Data Processing Policy of the Company is effective as of 1.5.2020.