

INFORMATION ON THE PROCESSING OF PERSONAL DATA

provided under Article 12 of 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 (hereinafter the **"Regulation"**)

(updated on 11 August 2020)

We, LEJAAN s.r.o., with our registered office at Šumavská 931/13, Vinohrady, 12000 Prague 2,

Reg. No. 285 99 349, a company incorporated in the Commercial Register of the Municipal Court in Prague under ref. No. C158886, as a personal data controller, hereby provide the following information on the processing of personal data in accordance with Article 12(1) of the Regulation.

PERSONAL DATA CONTROLLER:

Company: LEJAAN s.r.o.

Registered office: Šumavská 931/13, Vinohrady,
12000 Prague 2

Contact details: info@lejaan.cz

PURPOSES OF PERSONAL DATA PROCESSING

The purpose of processing of personal data expresses the justification for us to process your personal data. We process your personal data exclusively and solely for a specific purpose, namely our legal or contractual compliance or enforcement of compliance from third parties, including you, or to exercise rights with respect to third parties, including you.

We process your personal data solely for the following purposes:

1. (i) legal compliance required from our company in accordance with the applicable legislation;
2. (ii) to fulfil the needs of the contract entered into with you and to fulfil tasks required to conclude the contract as well as tasks aimed at concluding the contract, provided that these purposes of processing also apply to the processing of personal data of people with whom we come into contact since they represent a person with whom we intend to conclude a contract or have concluded a contract;
3. (iii) fulfilment of contractual conditions related to the service provided on www.lejaan.cz, including the set-up and maintenance of a user account and its removal;
4. (iv) protection of our assets against fraudulent or other illegal conduct, the transfer of personal data within the group of companies which the data controller is part of, specifically for administrative purposes, enforcement of legal obligations and the protection of rights, or direct marketing which constitutes a legitimate interest in promoting our products and services.

LEGAL BASIS FOR PERSONAL DATA PROCESSING

The legal basis for processing personal data is understood as the reason through which our rights to process your personal data, as a data controller, are linked to the Regulation. Our company processes your personal data exclusively on the basis of the following legal justification, which is a concluded contract or a legal regulation, or a measure which needs to be adopted before the contract is concluded, or alternatively processing is required because of our legitimate interests specified above. We do not anticipate any other legal basis for processing data, however we cannot fully rule this out; we confirm, however, that if we perform data processing based on any other legal basis, we will do so exclusively in accordance with the Regulation and other legislation. The personal data processed by us are partly personal data you are obligated to provide to us under the contract or data required to fulfil the contract or for legal compliance, and it would not be possible to conclude the respective contract with you should such data not be provided.

WHOSE DATA WE PROCESS

Our company processes personal data on the following categories of persons:

1. (i) customers, suppliers, partners and cooperating entities and their representatives;
2. (ii) employees;
3. (iii) bodies or members of the bodies of our company;
4. (iv) state administration and local administration officials;
5. (v) other people subject only to special consent.

We process the personal data of those referred to above to the extent to which they are provided to us upon contract conclusion or during pre-contract negotiations or to which they are available from public databases since we only require minimum data which would allow us to comply with our contractual commitments and legal obligations effectively. An employee refers to a person working with us in accordance with the Labour Code. A customer refers to a person using our services via www.lejaan.cz.

MINIMIZING PERSONAL DATA PROCESSED

Following the principle of minimizing the volume of the personal data processed, our company exclusively processes data needed for effective contractual and legal compliance.

As far as the company's employees and bodies are concerned, this mostly includes the following personal data: first name and surname, date of birth, Birth Number, permanent residence address or another contact address, phone number, email address, bank account number, etc.

As far as suppliers, partners and cooperating entities and their representatives are concerned, the data includes first name, surname, phone number and email, bank details, Company Registration Number, VAT Registration Number, etc.

As far as customers using our services via www.lejaan.cz are concerned, the data include first name, surname, date of birth and delivery address.

As far as state administration and local administration officials are concerned, the data only include first name and surname and contact details for the purposes of our company's legal compliance handled by these officials.

CATEGORIES OF RECIPIENTS OF YOUR PERSONAL DATA

Personal data are only processed by the members of our team who need the respective personal data for their activities.

These may include our employees as well as third parties we hire to perform our activities.

We provide your personal data to data processors in several categories who perform specialized activities for us, in particular as part of our legal compliance. Such categories include accountants, lawyers, tax advisers, auditors, IT specialists and others, however they always process your personal data for the purposes of our contractual or legal compliance and, where applicable, for the purposes of protecting our interests.

COOKIES

We use cookies on www.lejaan.cz. Our cookies policy is available on www.lejaan.cz.

DURATION OF PERSONAL DATA PROCESSING

We only process your personal data for the necessary time period to fulfil the purpose of the processing and to ensure our contractual and legal compliance. We process personal data in connection with the contract or with legal compliance during the term of the contract or the duration of legal compliance, and following that, for the period of time required by legislation for storing your personal data, and for 3 years from the date the purpose of personal data processing has been fulfilled providing your personal data are not subject to storage obligations.

THE REGULATION PROVIDES YOU WITH IMPORTANT RIGHTS IN RELATION TO YOUR PERSONAL DATA

The Regulation outlines essential rights which you may exercise to influence the processing of your personal data, within the confines of the Regulation. One of these rights is the right to be notified of any facts, rights and information specified in this document. Other essential rights which we have a duty to notify you of are as follows:

(A) RIGHT TO INFORMATION

You have the right to access the personal data we process, including information on the purpose of this processing, categories of personal data we process, recipients of these personal data, the planned duration of processing and your rights related to the processing or personal data.

(B) RIGHT TO WITHDRAW CONSENT

If you have consented to the processing of personal data, you have the right to withdraw that consent at any time. You can do so by email using the contact email address specified above, by post using our registered address or at our registered address using the form attached to this document.

(C) RIGHT TO OBJECT

You have the right to object to your personal data being processed at any time. If the objection is legitimate, we will immediately stop processing your personal data.

(D) RIGHT TO RECTIFICATION

You have the right to obtain the rectification of inaccurate personal data and to have incomplete personal data completed.

(E) RIGHT TO ERASURE

You have the right to require the termination (erasure) of the processing of your personal data and to be forgotten. The right to erasure may be exercised if:

1. (i) there is no applicable purpose any more,
2. (ii) consent to the processing of personal data is withdrawn and there is no other legal reason for processing,
3. (iii) you object to the processing and your objection is legitimate,
4. (iv) the personal data have been processed unlawfully,
5. (v) the erasure is required for the purposes of legal compliance, or
6. (vi) the personal data have been collected in relation to the offer of information society services to a child aged under 16.

RIGHT TO LIMITED PROCESSING

You have the right to a limitation on the processing of your personal data. The right to a limitation on the processing can be exercised if:

1. (i) the processed personal data are inaccurate, for a period of time necessary to verify the accuracy of the personal data,
2. (ii) the processing is unlawful and you refuse erasure of the personal data and request a limitation on their use instead,
3. (iii) we no longer require your personal data for the purposes of processing but you require them for determination, execution or defence or legal claims, or
4. (iv) you have objected to the processing, until it is verified whether our legitimate reasons prevail over your legitimate reasons.

(G) RIGHT TO DATA PORTABILITY

You have the right to portability of your personal data processed on the basis of your consent or for the purposes of fulfilling the needs of the contract. You have the right to

obtain personal data you have provided us with, in a structured, commonly used and machine-readable format, and the right to submit these data to another controller, or to have these data submitted to another controller (selected by you) directly by us, if technically feasible.

(H) RIGHT TO LODGE A COMPLAINT

You have the right to lodge a complaint against the processing of your personal data with the Office for Personal Data Protection, with its registered office at Pplk. Sochora 27, 17000 Prague 7, www.uoou.cz.

For additional information on your rights in connection with personal data protection, see the website of the Office for Personal Data Protection:
<https://www.uoou.cz/6-prava-subjektu-udaj/d-27276>.

Annex:
Personal data processing consent withdrawal form

WITHDRAWAL OF CONSENT

to the processing of personal data under 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.

I have granted my consent to the processing of my personal data for the purposes of [•, e.g. communication and distribution of commercial messages] (hereinafter the “**Consent**”) to LEJAAN s.r.o., with its registered office at Šumavská 931/13, Vinohrady, 12000 Prague 2, Company Reg. No. 285 99 349, a company incorporated in the Commercial Register of the Municipal Court in Prague, under reference No. C158886 (hereinafter the “**Company**”).

I hereby withdraw my Consent in its entirety [or, as applicable, specify the extent to which you withdraw your consent].

I am aware that withdrawal of Consent does not affect the legality of personal data processing based on Consent prior to its withdrawal and to the processing of personal data for any purpose other than as stated above and for a legal reason other than processing based on the withdrawn Consent.

In, on

First name and surname, address and signature