

## **INFORMATION ON THE PROCESSING OF PERSONAL DATA (referred to as “Information”)**

Company SQS VláknoVá optika a.s. processes personal data in accordance with the applicable laws and regulations, i.e. Act No 101/2000 Col. (Czech Personal Data Protection Act, referred to as Act) as in force, and in accordance with the EU Regulation 2016/679 (European Union General Data Protection Regulation (GDPR, referred to as Regulation) with its applicability starting 25th May, 2018.

We kindly notify you below on some important steps we take to safely process your personal data, which are provided to us in connection with your use of our services.

### **1. Administrator of Personal Data**

SQS VláknoVá optika a.s. (furthermore as SQS), phone number: +420 493 765 111, e-mail: [gdpr.info@sqs-fiber.cz](mailto:gdpr.info@sqs-fiber.cz), website: [www.sqs-fiber.cz](http://www.sqs-fiber.cz), business address: Komenského 304, Nová Paka 50901, IČO: 60913037

The personnel responsible for the administration and processing of personal data is Michal Satranský, contact e-mail: [gdpr.info@sqs-fiber.cz](mailto:gdpr.info@sqs-fiber.cz). In case of enquiries please contact him directly. Michal Satranský is not appointed DPO (Data Protection Officer) as SQS does not have the duty to appoint one.

### **2. The Extent of Personal Data Processing**

SQS processes personal data provided by you via the **inquiry template** on our website: [www.sqs-fiber.cz](http://www.sqs-fiber.cz) or via phone or written form and specifically the information provided during the ordering of goods or services provided by SQS. Processed personal data include identifiers (such as name, surname, date of birth, birth certificate number), contact information (address, phone number, email, account number, IP address), information on the goods and services that have been provided or are being provided to you and additionally any video and sound recorded by the security cameras inside the company's offices as well as the records of the calls and digital and/or written communication. We do not process any sensitive personal information other than the aforementioned.

### **3. The Purpose of Data Processing**

Personal data may be processed without the consent of clients for the sole purpose of negotiating the order of goods and/or services or because of the client's inquiry, submitted to the company. The data may also be processed in order to fulfill the legal duties of SQS (e.g. bookkeeping, accounting) and/or to ensure the safety of operations and to prevent or reduce damage, protect the company's legal rights and interests (this mainly concerns the video and sound recorded by the security cameras inside the company's facilities) and for risk evaluation in order to ensure the health safety and preservation of clients's property inside the SQS facilities)

Within the bounds of aforementioned purposes, the data collection and processing shall mainly occur in cases of:

1. identifying the client to the extent of the data, they personally provided, so that their inquiry and possible order of goods or services could be properly processed by SQS.

2. communicating with the client
3. monitoring the action inside the SQS facilities in order to ensure the health, safety and preservation of clients's property. The monitoring shall be based on the consent to the processing of personal data, provided by the client upon entering the SQS facilities and offices or by making an inquiry via the company's website. In case of minors, the consent shall be given by the legal guardian
4. fulfilling the legal requirements given to SQS by the Czech or EU legal system, or
5. when it is necessary for the protection of client's rights and legal claims (as per Act) or for the protection of the client's or other subject's legitimate interests (as per Regulation); legitimate interests shall be mainly the cases of protection of clients's rights and legal claims.

In some cases, personal data may be used for public presentation and SQS marketing activities, mainly on the company's website, in the newsletter or in the automated email notifications. The use of personal data for these purposes shall happen only when the client specifically permitted such use.

#### **4. Sources of Personal Data**

We process personal data provided to us in connection with the contract negotiations (mainly data provided via the inquiry template on the SQS website and data from the video and sound recorded by the security cameras inside the company's facilities), or data that have been provided to the company for the purpose of fulfilling the company's contractual or legal obligations, public data available at public registers (land register, commercial register, insolvency register, trade register etc.) and data gained from public authorities. Based on your additional specific consent, SQS may use other additional data gained from the web search engines, customer satisfaction surveys, or testing.

#### **5. Duty to Provide Personal Data?**

Providing personal data to SQS, as well as negotiating a business contract with the company is voluntary. However there are some personal data, that must be provided to SQS in order for the company to fulfil its legal duties or contractual obligations when without such data, the fulfillment of some services or obligations may not be possible by the company. These cases may include the data necessary for the identification of the client in order to fulfil the contract (direction of the supply, payment obligations, contact information for the purpose of specifying the contractual obligations, warranty claims etc.)

#### **6. Client's Rights as to the Processing of Their Personal Data**

The subjects, whose personal data are being processed by SQS, are given legal rights (according to the Act and the Regulation). SQS kindly informs the clients as to some of those rights.

1. When processing personal data provided via additional specific consent, the consent is always given voluntarily and clients shall always possess the right to revoke the consent at any moment, fully or partially. To revoke the consent, clients may use the "Revocation of the consent to the personal data processing" provided on the company website (i.e. in the same way in which the consent has been given), or in a written form sent to the company business address or email address (cited above). After

the date, cited in the “Revocation,” SQS may process only personal data to the extent necessary for the fulfillment of the company’s legal duties or for the protection of clients’s rights and legal claims.

2. Right to access personal data according to the Article 12 of the Act and the Regulation: If the subject shall request the access to the information on the processing of their personal data, SQS is required to provide such information (always in accordance with Article 12 (2) of the Act) without undue delay. Subject has also a right to receive an information, whether SQS process their personal data, and to gain access to them.
3. Every subject, which shall discover that their personal data are being processed by an Administrator in violation of the principle of privacy protection or in direct violation of the law, mainly if the data are incorrect - the subject may request the Administrator or the processing subject to explain or to remove the situation (mainly via blocking, correcting, completing or removing the personal data)

The Regulation additionally gives the subject following rights:

a) Right to correction, removal or restriction of data processing: You have a right to request SQS to correct or complete incorrect or incomplete data, request the removal of your personal data or request the restriction of the use of your personal data in connection to the SQS data processing standards.

b) Right to raise an objection: You have a right to raise an objection against the manner of personal data processing done by the SQS for the company’s and other subject’s legitimate interests (as per the Regulation). Legitimate interests may be (according to the Regulation) mainly the cases legal rights and claims protection. Every submitted objection shall be duly reviewed by the SQS and you shall be notified of the result.

c) Right to portability of personal data: You have a right (according to the conditions set in the Regulation) to get your personal information stored by the SQS and transfer them to the another subject, processing personal data.

d) Right to file a complaint to the Data Protection Supervisory: You have a right to file a complaint to the Data Protection Supervisory, if you suspect a violation of the Act or the Regulation when processing personal data. The Data Protection Supervisory office is Úřad pro ochranu osobních údajů, address: Pplk. Sochora 27, 170 00 Praha 7, for the subjects incorporated or living in the Czech Republic.

## **7. Providing Personal Data to Third Parties**

Personal data (in written and electronic form) are usually processed directly by the SQS. However, third parties may also process personal data for SQS purposes. In such cases - SQS and the third party sign data processing agreement, which shall provide the same level of personal data protection as was being provided by the SQS. Personal data may also be provided to SQS sub-contractors, providing SQS with services such as: bookkeeping and accounting, IT, supply of goods and services etc. The exact list of sub-contractors is available per request at [gdpr.info@sqs-fiber.cz](mailto:gdpr.info@sqs-fiber.cz).

SQS additionally provides personal data to supervisory authorities and other state institutions, in case of such duty being required by the applicable laws and necessary for the protection of SQS legal rights.

With subject's additional specific consent or per their request, their personal data may, in connection with the SQS marketing efforts, be provided to other parties or to the general public.

#### **8. Period, for Which the Subject Agrees to the Processing and Keeping of Their Personal Data**

SQS processes personal data based on their purpose and the duration of any contractual relationship (in order to fulfil the company's contractual obligations) and for another 10 years after the extinction of the last contractual relationship - in case a warranty claim needs to be addressed, or for improvement, correction, modification purposes and for the purpose of archivation according to the applicable laws and regulations.

If the processing of personal data is based only on the subject's permission and without forming any further contractual relationship (e.g. based only on the Consent to the processing of personal data, in case of the subject making an inquiry via the company website or in a written form) the data may be archived for 5 years.

Consent to the processing of any video and sound, recorded by the security cameras inside the company facilities, shall be given for the period of 7 days after its taking. Period, for which the Consent is given may also be terminated via the Revocation of the Consent (as mentioned above).

#### **9. Securing the Protection of Personal Data**

Personal data are under constant physical and electronic surveillance, additionally SQS possesses corresponding control mechanisms ensuring appropriate protection of processed personal data against unauthorised access or transmission, lost, destruction or abuse. All personnel, accessing the personal data, are bound by confidentiality.

#### **10. Informing the Client on the Principles and Rules Governing the Personal Data Processing**

Client shall be informed about the rules governing the personal data processing via the company's public website: [www.sqs-fiber.cz](http://www.sqs-fiber.cz), where they can also access the templates for easier implementation of their rights set in the Regulation. Client may also get additional information at the SQS offices.