



Processing of personal data policy

Information memorandum

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1. Processing of personal data policy

Our company TQM - holding s.r.o. , Company Reg. No.: 49606395 , with its registered office at Těšínská 1028/37, Opava 746 01, registered at the Regional Court in Ostrava under File C12039 will process your personal data during its activities. This policy sets out the rules that we will follow when



processing your personal data to preserve the right to protect your personal data, your privacy, and to ensure that your personal data is not misused. We will follow this policy for the entire period during which we process any of your personal data.

The personal data processing rules contained in this policy correspond to the obligations imposed on us in the processing of personal data by 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 and repealing Directive 95/46 / EC - General Data Protection Regulation (hereinafter referred to as "GDPR").

Through this policy, we also inform you of the facts and your rights that you need to be aware of in accordance with the GDPR, and which ensure sufficient transparency in the processing of your personal data.

This policy sets out the procedures and principles on the basis of which we will process and handle your personal data. If anything is unclear or you would like to ask anything about your personal data, please use the contact information provided in this policy.

2. Collection of personal data

2.1. Reasons for collecting personal data

We will only collect and process personal data from you if it is necessary for:

- a) Fulfilling the contract that you have signed or closed with us.
- b) The provision of the service you want to use.
- c) Compliance with the requirements of the law.
- d) The protection of your vital interests.
- e) The purposes of our legitimate interests, unless in the case of your interests or fundamental rights and freedom of data subjects that require the protection of personal data are preferred.

2.2. Sending for direct marketing

A legitimate interest may be the processing of your personal data for the purpose of direct marketing - sending business messages if we already deal with you in a business relationship and the business message will directly relate to the goods or services we have already provided to you. However, you can unsubscribe from such marketing messages at any time via the link in your business message or via the contact email below.

2.3. Consent

In other cases, we may only collect and process your personal data with your explicit and free consent. You may at any time revoke your consent through the contact details provided in this policy. Specific conditions for the use of your personal data after granting consent are always provided in each individual consent.



2.4. Acquisition of personal data

We do not obtain your personal data from publicly available sources, but always from you or from third parties who cooperate with us and have obtained personal data from you in accordance with the law and may transmit it to us. In both cases, we will follow this policy.

We will either expressly request your personal data or obtain it from you if you register with our services, enter into a contract with us or use a service. Alternatively, you can provide us with your personal data, for example, by filling out forms on a website or communicating with us via telephone, e-mail, internet discussion or otherwise. Some of them are collected automatically with your consent, such as using cookies when you visit our website.

We will always inform you about the specific reason for processing your personal data. This information is either stated directly in the contract, or in the terms of the service provided or in this policy. Alternatively, you may ask us at any time for the reasons for processing your personal data through the contact details listed below.

3. The use of your personal data

We use your personal data primarily to provide you with our services, perform a concluded contract, comply with legal requirements, notify you of changes in our services, improve our services, enable us to conclude the required contract or perform it, or to meet legal requirements. We may also use this information with your consent to inform you of other services and products that we or selected third parties offer, which may be of interest to you or you could use. We will always inform you of any further use of your personal data.

4. Passing your personal data on to others

4.1. Passing on of personal data

We will not share your personal data with anyone except as described in this policy.

Your personal data will be accessed by our company's employees who will be in charge of working with this personal data. All employees who will have access to your personal data are committed to secrecy in writing, therefore, your personal data may not be disseminated anywhere. These employees are also responsibly selected and properly trained to know how they should treat your personal data and how the processing of your personal data can take place. This is how we strive to ensure the best possible protection of your personal data.

We will then pass on your personal data to some third parties if necessary. These persons are referred to as processors. Our company is responsible for ensuring that these processors provide reasonable assurance that your personal data will be processed. We choose all of the processors responsibly. At the same time, the processors will be contractually obliged to perform all their duties, ensuring that your personal data is adequately protected and minimize the risk of abuse.

4.2. Third persons to whom personal data will be transferred

These are the categories of people whom we may share your personal data and who can access your personal data:



category of beneficiaries	Purpose of the transport of personal data
Legal advisors	For legal advice
accountants	For accounting services
Tax advisers	For tax advice
Marketing consultants	For marketing advice and services
IT service providers	IT management and administration of user applications
Web master	Managing our website
On-line tool providers	Use these tools to improve the quality of our services and your customer experience
Service providers to distribute messages	To ensure the distribution of business and other communications
Carriers	Transportation of ordered goods
Subcontractors	So they can provide required services

If you consent to this, we may also provide certain information to selected third parties to inform you of the services and products that we or selected third parties offer and which may be of interest to you.

We may also share your personal data with other third parties in order to prevent crime and reduce risks, if required by law and where we consider it appropriate, in response to a lawsuit or to protect the rights or property of our company, our partners or you.

4.3. Transmission outside the EU

Your personal data is not transmitted to countries outside the European Union or to international organizations, except for situations where they are being transferred there in order to better back up and protect data and situations under these conditions.

5. Automatic individual decision making and profiling

Our company does not perform any automatic individual decision making or profiling process that would have any legal effect on you or would otherwise have any significant impact on you during the processing of your personal data. If this is changed, we will inform you immediately

6. Time of processing of personal data

We only process your personal data for the necessary amount of time. If your personal data is no longer needed for processing purposes, we will immediately delete it.

In the case that we process your personal data by consent, the processing time is stated in this consent.

If we process your personal data as a result of legal provisions, we will process it for as long as the law requires it. In case the law requires the archiving of certain data, we will archive these personal data in court with the law for the required time.

If we process your personal data as a result of an agreement or a provision of a service, we will process your personal data during the performance of this agreement or the provision of the service and 10 years after the termination of the contract or the provision of the service. However, during this time, we process your personal data only for the purpose of preventing any legal claims or conducting legal proceedings. The 10-year period then corresponds to the maximum limitation period after which



the claims can be successfully enforced in court. In the event that any legal proceedings or other proceedings occur in which your personal data is required, we will process them for the duration of these proceedings, including any enforceable and other follow-up proceedings.

7. Your rights

7.1. The right to information

At any time, you can ask us send you a confirmation that we are processing some of your personal data at the contact details below and if we are processing your personal data, you have the right to access this information:

- a) For what purpose we process your personal data and what its categories are.
- b) Who the recipients and processors of your personal data are.
- c) How long your personal data will be saved and if this time cannot be determined, then the use criteria to determine this time.
- d) Which personal data you may request removal or processing restrictions for and object to such processing.
- e) About the right to file a complaint with the Supervisory Authority.
- f) About personal data sources, unless they have been obtained from you.
- g) Whether automatic decision-making or profiling takes place automatically.

If you ask for it, we will provide you with copies of your processed personal data. If you require additional copies, you may be charged for the costs incurred. If you request it in electronic form, copies will be provided in electronic form if you do not request it in another way. However, we have the right to require verification of your identity to verify that this information regarding your personal data does not reach an unauthorized person.

We will try to provide you with this information as soon as possible, depending on the range of information you require. However, within 30 days at the latest.

7.2. The right to correction

If you find that some of your personal data is inaccurate, imprecise or incomplete, you are entitled to have your personal data corrected or supplemented, without undue delay, after you communicate this fact to us.

7.3. Right to be forgotten - the right to delete

You have the right to delete your personal data without undue delay if:

- a) Your personal data is no longer needed for the purposes for which it was collected.
- b) To withdraw your consent.
- c) To object to the processing.
- d) We have processed your personal data unlawfully.
- e) The legal obligation will be fulfilled according to the law by deletion.
- f) Personal data were gathered in connection with the offer of information society services.



However, we will not delete your personal data for the above reasons, if one of the reasons provided for in Article 17 (3) of the GDPR is stated here.

If this is technically possible and feasible, and your personal data has been disclosed or personal data has been passed to a third-party, we will also delete this personal data.

7.4. Right to limit processing

You have the right to limit the processing of your personal data if:

- a) You tell us that your personal data is inaccurate until the accuracy of our personal data is verified.
- b) We process your personal data unlawfully, but you ask us to restrict the use of your personal data instead of deleting it.
- c) We no longer need your personal data, but you require it to identify, exercise or defend legal claims.
- d) You have objected to the processing, until it is verified that it is justified.

During the limitation of processing, your personal data may only be stored and otherwise processed only upon your consent, for the purpose of determining, enforcing or defending legal claims or for the public interest.

7.5. Right to object

You have the right to object to the processing of your personal data if we process it for direct marketing purposes. The objection must be sent to us in writing or by e-mail. In the event you object to processing for direct marketing, we will no longer process your personal data to this extent unless we substantiate serious legitimate processing grounds that outweigh your interests or rights and freedoms, or for determining, exercising or defending legal claims.

7.6. Right of data portability

If you ask us to do so, we will pass on your personal data in a structured, usable format to provide it to another administrator. As long as this is technically possible, you may want us to pass on your personal data directly to the administrator you designate.

7.7. The right to file a complaint

You may lodge a complaint at any time regarding the processing of your personal data or the failure to comply with our obligations under the GDPR to the Supervisory Authority. The Supervisory Authority is the Office for Personal Data Protection in the Czech Republic, headquartered at Pplk Sochora 27, 170 00 Prague 7, www.uouu.cz.

8. Measures implemented

Our company has introduced personal, organizational and technical measures to eliminate the various risks to your rights and freedoms and to protect your personal data. For this purpose, we have trained all of our staff who are in contact with personal data. Furthermore, all personal data in physical form



is secured against unauthorized access. For personal data stored in electronic form, we comply with security standards and they are similarly protected against unauthorized access. At the same time, we have developed a risk analysis to prevent risks and have taken appropriate action.

9. The person dealing with matters of personal data protection

Our company has no obligation to appoint a personal data protection officer within the meaning of GDPR, nor has it named one. However, it has identified the person in charge of personal data protection in our company. You may address this person in any matter relating to your personal data and the use of your rights. This person is JUDr. Tomáš Roleder, e-mail: ooou@tqm.cz.

10. Contact details

In case of any requests, demands, comments or confusion, you may contact us by email at ooou@tqm.cz or in writing to our business address.

11. Conclusion

This policy was adopted on 1. 1. 2018. Our company may change this policy if it remains in compliance with the law and the GDPR. We will inform you of any changes to this policy on our website.