

PERSONAL DATA PROCESSING POLICY

Dear clients, employees, and other partners,
the company **MATISTOTELES s.r.o.** hereby fulfils its statutory **information obligation** regarding the processing of personal data. We assure you that the **security of your data and its processing in compliance with legal regulations are our priority**. Below you will find an overview of what personal data we collect, for what purposes and on what legal basis we process it, to whom we may possibly transfer it, how long we retain it, and what rights you have in this context.

Controller of Personal Data: The controller of your personal data is **MATISTOTELES s.r.o.**, Company ID No.: **245 92 269**, Tax ID No.: **CZ24592269**, with its registered office at **Římská 1222/33, Prague 2 – Vinohrady, Post Code 120 00**, registered in the Commercial Register maintained by the Municipal Court in Prague, Section C, Insert 443776. (In the text below, the **Controller** is also referred to as the “**Company**” or “**we**”.) For any questions or to exercise any rights related to the processing of personal data, you can contact us **by e-mail at info@matistoteles.cz** or in writing at the above-mentioned registered office address. **The Company has not appointed a Data Protection Officer** (unless expressly stated otherwise), as it is not obliged to do so under the GDPR.

Scope of Personal Data Processed: We process **only such personal data as you yourself provide to us** or that we obtain in connection with our contractual relationship (or from public registers or sources, if necessary). Typically, this includes identification and contact data of individuals (name, surname, address, email, telephone), data needed for the conclusion and performance of a contract (e.g. payment information, company ID/VAT No. for entrepreneurs), and possibly other data depending on the nature of the specific relationship (e.g. for employees, birth number/personal identification number, CV details, medical fitness, etc.). We process **special categories of personal data** (sensitive data, such as health information) only in exceptional cases and exclusively when necessary – for example, in employment relationships for the purposes of mandatory medical check-ups, keeping records of temporary incapacity for work, fulfilling obligations towards health insurance, etc.

Purposes and Legal Bases of Processing: We process your personal data **transparently and to the extent necessary** for specifically defined purposes. In accordance with Article 6 of the GDPR, there is always one of the following **legal grounds** for processing:

- **Compliance with legal obligations** of the Company (Article 6(1)(c) GDPR).

- **Performance of a contract** concluded with the data subject or taking steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) GDPR).
- **Legitimate interests** of the Company or a third party (Article 6(1)(f) GDPR).
- **Consent of the data subject** to the processing for one or more specific purposes (Article 6(1)(a) GDPR).

In practice, we process personal data mainly for the **purpose of concluding and performing contracts** with our customers, employees, or business partners; further, to **fulfil legal obligations** (e.g. accounting, tax, or employment obligations); possibly on the basis of our **legitimate interests** (e.g. maintaining internal records, protecting property, improving our services, direct marketing to existing customers); or **on the basis of your consent** (e.g. for sending commercial communications to new customers or retaining a job applicant's CV for future cooperation).

Below we provide a detailed breakdown of the individual **purposes of processing**:

Purpose: Fulfilment of statutory obligations. We process personal data **when we are required to do so by specific legal regulations** – for example, accounting and tax laws, labour law provisions, archiving and record-keeping regulations, and similar. The **scope of data** is determined by the relevant laws – typically it includes identification data in documents (such as invoices, payroll records, etc.), data necessary for tax and insurance payments, employee records (e.g. an employee's personal identification number for health insurance registration), records of working hours, wages and deductions, and so on. The **legal basis for processing** is directly established by law – in particular, **Act No. 563/1991 Coll., on Accounting; Act No. 586/1992 Coll., on Income Taxes; Act No. 262/2006 Coll., the Labour Code; Act No. 187/2006 Coll., on Sickness Insurance; Act No. 582/1991 Coll., on the Organisation and Implementation of Social Security**; and related implementing regulations. The **retention period** for this data is governed by the relevant laws – e.g. we retain tax documents for **at least 10 years** from the end of the taxable period, payroll sheets and employee pension insurance records for **30 years** from their creation, personnel files of employees generally **10 years** from termination of employment (unless special legal regulations require a longer period). **Personal data processed for this purpose are not published and we only provide them to processors or recipients who help us fulfil the given obligations** (e.g. an external accounting firm for bookkeeping and payroll management) and to the relevant public authorities (e.g. the Financial Authority, Social Security Administration, health insurance companies, labour inspectorate) as required by law. **We do not transfer personal data to third countries outside the EU for the purpose of fulfilling statutory obligations**, except where such obligation arises from an international treaty or EU law (for example, fulfilling duties under an EU regulation). When processing data for the purpose of fulfilling legal obligations, there

is no automated decision-making or profiling. Without providing this data, we cannot meet the given legal obligation, and it may happen that we will be unable to conclude a contract with you or provide a service (if doing so would result in a violation of statutory requirements).

Purpose: Conclusion and performance of contracts with customers and users of the e-shop/Platform. If you are our **customer** (for example, you purchase goods or services in our e-shop, or you participate in the online platform or contests we operate), we process your personal data **for the purpose of concluding and performing a contract**. Such contracts are most commonly a **purchase contract** (when you place an order for goods or a paid service) or the **Platform Terms of Use** that you agreed to (when registering and participating in contests and the online community). Without the provision of the necessary personal data, it is not possible to conclude or properly perform the contract (for instance, we would not know your address to deliver goods, your email to confirm the order, etc.). The **scope of data processed** in this context includes, in particular, the identification and contact details you provide in the contract or order (name, surname, billing and delivery address, email, telephone), as well as data about the ordered goods/services (specification of the product/service, chosen method of delivery and payment, bank account/payment card number – only to the extent necessary for executing the payment, not under our direct control), and any other information you voluntarily provide for the purposes of the contract. The **legal basis** for this processing is the **performance of the contract** concluded with you, or taking steps prior to entering into a contract (at your request). We use the data in order to deliver the ordered goods or provide the service, to communicate with you regarding the status of your order, to answer your queries, or to address any requests you have relating to the contract. The **retention period** for this data is the duration of the contractual relationship and then for as long as necessary to settle any rights and obligations from the contract (for example, the period needed to handle any complaints or warranty claims). Thereafter, documents containing personal data are archived for the period required by the applicable legal regulations (these typically fall under the statutory time limits mentioned above, e.g. 10 years for accounting documents, etc.). **Personal data are not made public in the course of contract performance and we only disclose them to third parties providing partial fulfilment on our behalf**, such as carriers (courier or shipping companies) or payment service providers, and then only to the extent necessary to deliver the goods or execute the payment. These external entities act either as independent controllers (e.g. a courier service) or as processors (if they act on our behalf and under our instructions). **We do not transfer personal data for the purpose of contract performance to any countries outside the EU that do not guarantee an adequate level of protection**; all processing takes place within the EU/EEA, or using service providers from third countries only if we ensure appropriate safeguards (e.g. standard contractual clauses) in accordance with Chapter V of the

GDPR. When processing personal data for contract performance, there is no automated individual decision-making or profiling. The provision of this data is a **contractual requirement** and a condition for concluding the contract – if you refuse to provide it, we will not be able to enter into the contract with you or deliver goods/provide the service.

Purpose: Personnel administration and performance of employment contracts (Company employees). If you serve as an **employee, contract worker**, or other similar personnel with us, we process your personal data for the purposes of concluding, maintaining, and performing your **employment contract or work agreement**, and the related obligations of the employer towards you. The **scope of data** typically includes identification and contact information, data needed for personnel records (date of birth, personal identification number, nationality, information about qualifications and work experience, bank account number for salary payments, information about family members to the extent needed for tax allowances or benefits, etc.), health insurance provider, attendance records and work output, and possibly information on medical fitness (results of occupational health examinations) and other data within the limits of the Labour Code and related regulations (e.g. records of work injuries, use of leave, maternity/paternity leave, etc.). The **legal basis** for processing is the **performance of a contract** (your employment contract or work agreement) alongside **compliance with the employer's legal obligations** under labour, tax, and other regulations. We use the data for human resources and payroll administration – for example, calculating and paying wages, withholding taxes and insurance premiums, fulfilling occupational health and safety duties, organising your work (issuing employee ID cards, setting up IT accounts, managing attendance systems, providing work equipment, etc.). The **retention period** for employee personal data is determined by specific regulations – most documents in the HR and payroll area must be retained **for the duration of employment and typically for 10 years after its termination**, although **payroll records and records of insured periods are kept for 30 years** for pension insurance purposes (under the social security law). After the stipulated periods, documents are securely shredded or deleted. **We only disclose employees' personal data to third parties where necessary** – primarily to governmental authorities (e.g. Social Security Administration, health insurance companies, Labour Office, Financial Authority), or to external processors who assist us with payroll or HR administration (e.g. an external accounting/payroll company, providers of HR or legal services, etc.). All processors are bound by contractual obligations of confidentiality and data security. **We generally do not transfer employees' personal data to countries outside the EU**; if ever such a transfer became necessary (for example, using an international cloud-based HR system), we would only carry it out subject to fulfilling the conditions of Chapter V of the GDPR (e.g. standard contractual clauses or other appropriate safeguards). Automated

decision-making is not applied to employee data processing (if we were to introduce, for instance, an automated attendance system evaluating late arrivals, you would be informed in advance and such processing would occur on the basis of necessity for contract performance or our legitimate interest in effective working time management).

Purpose: Recruitment and hiring of new employees. If you apply for **employment or cooperation** with our Company (for example, by sending us your CV and cover letter, or by filling out an application form on our website), we process the personal data you provide for the purpose of **assessing your suitability for the position and conducting the recruitment process**. The **scope of data** usually includes identification and contact details (name, surname, address, telephone, email), information contained in your CV (details of education, work experience, skills, language proficiency, possibly a photograph, references or portfolio links, etc.), and any other information you communicate to us in the course of recruitment (e.g. results of any personality or professional tests you undergo, etc.). The **legal basis** for this processing is **taking steps prior to entering into a contract** at your request (these are actions directed towards a possible conclusion of an employment contract or work agreement). If you are not selected, your data will be **shredded or deleted** after the recruitment process concludes; the only exception is if you **grant us consent to retain your CV** for potential consideration for other suitable opportunities – in that case, we will keep your materials on file **for no more than 1 year** after the end of the recruitment process in question (or for the period specified in your consent), or until you withdraw your consent, if that occurs earlier. After that, your data will be permanently erased. Your **consent** to processing for future job opportunities is, of course, **voluntary**, and you may withdraw it at any time (without affecting the lawfulness of processing that occurred before the withdrawal). **Any transfer of applicant data to third parties** during recruitment is carried out only in exceptional cases – for example, to a provider of recruitment services or an employment agency with which we cooperate (acting as our processor, or possibly as an independent controller, about which we would inform you in the specific recruitment process), or to consultants who perform candidate assessments on our behalf. **We do not transfer applicant data to any third countries outside the EU.**

Purpose: Legitimate interests of the Company – direct marketing (commercial communications). We may use your contact details (especially your email address) to **send you commercial communications, news, and offers** related to our products and services. Such **direct marketing communications** are primarily sent to our **existing customers** on the basis of our **legitimate interest** (this is the use of contact information within an existing customer relationship). We take care that the content of these messages relates to products or services you have already purchased or inquired about from us, and that we do not unduly inconvenience you.

You have the right to object to such processing at any time, free of charge – e.g. you can contact us by email info@matistoteles.cz and we will cease sending you these communications. In the case of individuals who contact us **without a prior purchase** (e.g. by making an inquiry or signing up for a newsletter on our website), we will send marketing communications only **on the basis of their consent**. In all cases, **we will only share your email address for marketing with third parties if we use a specialised service or application for the distribution** (acting as our processor), and such a partner is not permitted to use the data for any other purpose. **We do not sell or publicly distribute marketing data**. The **duration of processing** for marketing purposes continues until you express your objection (opt-out) to the processing or withdraw your consent (if consent was the legal basis). After that, we will no longer use your contact information for this purpose. We strive to tailor our commercial communications to the extent you use our services and to your preferences (for example, if you subscribe to our newsletter, we may – on the basis of **legitimate interest** – track which topics you are interested in and which links in the message you click, in order to choose relevant content in the future; such **profiling for direct marketing purposes** is permitted by law). However, no other automated decisions are made based on your data in the marketing context (for instance, there is no decision that would deny you a service – we are only customising offers).

Purpose: Legitimate interests of the Company – protection of property and safety (CCTV system). In the premises of our registered office and any operational facilities, we may operate an **industrial camera system with recording** for the purpose of **protecting the Company's property, controlling access, and ensuring the safety of persons**. Recordings obtained this way may capture video footage of individuals present in the monitored area. The **legal basis** for this processing is the Company's **legitimate interest** in protecting its property, preventing unlawful activities, and ensuring the safety of employees and visitors – given the nature of the premises (office space), such monitoring is proportionate and is carried out in accordance with guidelines from the Office for Personal Data Protection. The **categories of data subjects** primarily include our **employees**, as well as **visitors, clients, contractors**, and other persons who **enter the monitored areas**. The **category of data** processed is strictly **visual recordings (video)** capturing the appearance and possibly the behaviour of these individuals on the premises; recordings are not made with sound. The **retention period** for CCTV footage is **very short-term** – generally **a matter of days** (recordings are continuously overwritten or automatically deleted, usually no later than 72 hours). Only in the event that a security incident is detected (e.g. footage capturing a theft, vandalism, accident, etc.) may the relevant recording be retained for as long as necessary to address the incident and protect the Company's rights (for example, until the conclusion of a police investigation or a final court decision). **CCTV**

recordings are not disclosed to any external recipients, except in situations involving unlawful conduct or a security incident – in such cases, we may provide the relevant footage to the **law enforcement authorities, administrative offence authorities, or our insurance company** for the liquidation of an insurance claim (always only the relevant excerpt necessary for the proceedings). Such disclosure is lawful and is not considered a breach of personal data protection, as it is done in pursuit of legitimate interests in the exercise of legal claims and crime prevention. CCTV recordings are subject to strict security measures – they are stored in encrypted form, with access restricted to authorised persons only, and any playback or copying of recordings is logged. Monitored areas are clearly marked with a camera pictogram and information about the controller – **the cameras do not monitor private areas (such as restrooms or unrelated neighbouring properties)** and are configured so as not to unduly infringe on your privacy beyond what is necessary to protect property and individuals.

Transfer of Personal Data Abroad: As noted above, we **do not, as a rule, transfer personal data to countries outside the European Union** or the European Economic Area that **do not ensure an adequate level of personal data protection**. All processing takes place either in the territory of the Czech Republic or other EU/EEA member states. If in individual cases it should become necessary to transfer data to a so-called third country (for example, using a service provided by a supplier based outside the EU, such as certain cloud or newsletter services), **we will ensure the conditions of the GDPR for such transfer are met** – in particular, data will only be transferred to countries with an adequacy decision of the European Commission, or appropriate **standard contractual clauses** will be concluded or other **adequate safeguards** for the protection of your data will be put in place. We would inform you of each specific transfer of data outside the EU if required by law.

Security of Personal Data: We have implemented and maintain **technical and organisational measures** to safeguard your personal data against loss, misuse, unauthorised access, or other incidents. These measures include, for example, controlled access rights to systems processing sensitive data, encryption of data in transit and in databases, use of firewalls and anti-virus software, regular security audits of IT systems, and training of employees in the proper handling of personal data. All persons who come into contact with your personal data (our employees, processors) are **bound by statutory and contractual confidentiality obligations**. In the event that, despite all measures, a personal data security breach with a high risk to your rights should occur (for example, a data leak), we will promptly inform both you and the competent supervisory authority (the Office for Personal Data Protection) in accordance with Articles 33 and 34 GDPR.

Use of Cookies: To create offers that match your preferences, we use cookies and similar technologies, such as pixels, tags, etc. (hereinafter collectively “**cookies**”).

Cookies are small text files that enable a returning user to be recognised and allow analysis of their use of our website.

Duration of storage of cookies: Most cookies we use are automatically deleted from your device after you end your browsing session (so-called **session cookies**). In addition, we also use some **persistent cookies** that remain stored even after the session ends. Upon your next visit to our website, we can thus automatically recognise that you have visited before, and we can tailor content and settings to your preferences. These cookies help make our offerings more user-friendly, effective, and secure. A detailed list of the cookies we use can be found in our Cookies Policy, which provides information about the cookie providers, purposes of their use, categories of data processed, legal bases for processing, retention periods, and locations where the data is processed.

Types of cookies:

a) **Necessary cookies (technical cookies):** We use technical cookies to ensure the proper functioning of our website. Disabling these cookies may cause the site to not function correctly.

b) **Use of cookies and external content for marketing/advertising (marketing cookies):** We use cookies for marketing and promotional purposes, so that, based on an analysis of user behaviour while browsing our site, we can infer their interests and needs and segment users with similar interests and needs (target groups). Consequently, targeted advertising can be directed to users assigned to specific target groups. These cookies are also used to control the frequency with which ads are displayed (particularly to limit how often they appear) and to measure their impact, especially campaign effectiveness. Through advertising networks, third-party cookies may also be used in connection with their services. These cookies determine whether a user has visited a website and transmit that information to a third party, where it may be combined with features provided by other organisations. In addition, special cookies enable the activation of advertising for users of social networks.

c) **Analytical cookies:** Analytical cookies are used to track your behaviour on our website and to evaluate it, for the purpose of improving the site and tailoring it to your needs.

d) **Functional cookies:** Functional cookies serve to remember user choices (for example, language preferences, login details) and to customise website functions to your needs.

We require **your consent** to use cookies. You can give your consent before you begin browsing our website. **Not providing consent does not prevent the technical storage of or access to data** (so-called “technical cookies”) whose sole purpose is to carry out or facilitate the transmission of a communication over an electronic communications network, or which is strictly necessary to provide our

services. The controller respects your decision regarding the acceptance of cookies. Any consent you give us can be withdrawn at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before its withdrawal.

Rights of Data Subjects: In processing personal data, we respect its confidential nature and your rights. Under the GDPR, as a **data subject**, you have in particular the following **rights**:

- **Right of access** to your personal data – You have the right to obtain from us **confirmation** as to whether or not we are processing your personal data, and if so, you have the right to obtain **a copy of that data**, as well as information about the details of its processing.
- **Right to rectification** – If you discover that we maintain **inaccurate or outdated personal data** about you, you have the right to request that it be **corrected or updated**. Upon verification, we will make the correction without undue delay.
- **Right to erasure** (“right to be forgotten”) – Under the conditions set out in Article 17 GDPR, you have the right to request that we **erase your personal data**, for example if it is no longer needed for the purposes for which it was collected, if you withdraw consent and there is no other legal ground for processing, if you object to the processing and our legitimate grounds do not override your interests, if the data was processed unlawfully, and so on. If we have made your data public (which we do not normally do), we will, taking into account available technology and implementation costs, take reasonable steps to inform other controllers processing the data that you have requested erasure of any links to or copies of that data. Please note that the right to erasure is not absolute – for instance, we cannot erase data that we must process due to a legal obligation (typically invoices, accounting records, etc.), or data that remain necessary for the establishment, exercise, or defence of our legal claims. In such cases, we will inform you of the reasons why we cannot fully comply with your request.
- **Right to restriction of processing** – In certain situations, you may request that we temporarily **limit the processing** of your personal data. This could be, for example, when you contest the accuracy of the data (for the period necessary to verify it), or if you believe the processing is unlawful but you do not seek erasure, or if we no longer need the data but you require it for the establishment, exercise, or defence of legal claims, or if you have objected to processing (for the period while we determine whether our legitimate grounds override yours). During the restriction period, we may only store your data and process it under limited conditions (for example, with your consent or for the establishment, exercise, or defence of legal claims). You will be informed before any restriction is lifted.

- **Right to data portability** – In cases where processing is **carried out by automated means on the basis of your consent or a contract**, you have the right to receive the personal data concerning you that you have provided to us in a **structured, commonly used, machine-readable format**, and you have the right to **transmit those data to another controller** (or to have us transmit them directly, where technically feasible).
- **Right to object** – If we process your personal data on the basis of our **legitimate interests** (Article 6(1)(f) GDPR), you have the **right to object at any time** to such processing. Unless we can demonstrate compelling **legitimate grounds** for the processing that override your interests and rights, we will accede to your objection and cease the processing in question. In particular, you can object at any time to the processing of personal data for **direct marketing purposes**, in which case we will always immediately stop processing your data for that purpose.
- **Right to withdraw consent** – If the processing of your data is based on your consent (for example, consent to receive a newsletter or to be included in a talent pool for future job openings), you have the right to **withdraw that consent at any time**. Withdrawal of consent has no retroactive effect – we will stop processing the data, but any processing carried out before the withdrawal remains lawful. Withdrawal of consent does not affect the processing of personal data that is conducted on another legal basis.

Exercising Your Rights: You may exercise your rights **in writing** (by sending a letter to our registered office address) or **electronically** (by emailing info@matistoteles.cz). In your request, please provide your identifying information and specify which right you wish to exercise and to what extent, and what data or processing it concerns. For better verification of your identity, we may (especially for requests submitted electronically) ask for additional confirmation or information (this is also to protect your data from being disclosed to an unauthorised person). We will respond to your requests **without undue delay, and in any case within 1 month** of receiving the request. In complex cases, this period may be extended by an additional two months, in which case we will inform you accordingly, including the reasons. We will provide **access to your personal data free of charge**. Only if your request is manifestly unfounded or excessive (for example, if you repeatedly request the same information), we may, in accordance with Article 12(5) GDPR, charge a reasonable fee or refuse to act on the request.

Right to Lodge a Complaint: If you believe that our processing of your personal data is in violation of the GDPR or other data protection legislation, **you have the right to lodge a complaint** with a supervisory authority. In the Czech Republic, the supervisory authority is the:

Office for Personal Data Protection (Úřad pro ochranu osobních údajů –

ÚOOÚ)

Pplk. Sochora 27, 170 00 Prague 7, Czech Republic

Website: www.uoou.cz

As a citizen of the Czech Republic, you may also lodge a complaint with the supervisory authority of the Slovak Republic, if the controller is a Slovak company:

Office for Personal Data Protection of the Slovak Republic

Digital Park One,

Námestie 1. mája 18,

811 06 Bratislava, Slovak Republic

Website: www.dataprotection.gov.sk

As a citizen of the Republic of Poland, you may also lodge a complaint with the supervisory authority of the Republic of Poland if the controller is a Polish company:

Urząd Ochrony Danych Osobowych

ul. Stanisława Moniuszki 1A, 00-014 Warsaw

Website: <https://www.uodo.gov.pl>

<https://uoou.gov.cz/cinnost/zahranici/mezinarodni-spoluprace/kontakty-a-odkazy/narodni-urady-pro-ochranu-osobnich-udaju-v-eu>

You can submit a complaint **to the Czech Office or to the supervisory authority of any EU Member State** in which you have your habitual residence or place of work, or where the alleged infringement of data protection laws occurred. However, we would be grateful if you would consider raising any concerns with us directly first – the protection of your data is important to us, and we believe that any suggestions or complaints can be resolved together to your satisfaction.

Additional Information: This Personal Data Processing Policy is publicly available on our Company website in the **Privacy** section, where you can **view, download, or print** it at any time. We may update this Policy in the future, especially if there is a change in our processing activities or in relevant legislation. We will inform you of any significant changes in an appropriate manner (for example, by a notice on our website or by email). The current text of the Policy will always be available on our website. If you have any questions regarding the processing of your personal data, please do not hesitate to contact us via the above-mentioned contact details.