

## INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR PARTNERS, COLLABORATORS AND VISITORS TO THE PREMISES OF TEDOM GROUP COMPANIES

The individual companies of the TEDOM Group always process personal data in accordance with applicable legal regulations, i.e. EU Regulation 2016/679 (General Data Protection Regulation) (hereinafter referred to as the "Regulation") and Act No. 110/2019 Coll., on the processing of personal data, as amended (hereinafter referred to as the "Act").

### Information on the processing of personal data (Article 13 of the Regulation)

**Personal data controller:** TEDOM a.s., registered office at No. 195, 674 01 Výčapy, Company ID No.: 28466021, TEDOM energie s.r.o., with its registered office at Klášterského 731/13, 61700 Brno, ID No.: 03328325, TEDOM power s.r.o., with its registered office at No. 195, 674 01 Výčapy, ID No.: 11795255, TEDOM solution s.r.o., with its registered office at č.p. 195, 674 01 Výčapy, ID No.: 17905176, TEDOM trading s.r.o., with its registered office at Jankovcova 1569/2c, 17000 Prague, ID No.: 07062966, TEDOM UA s.r.o., with its registered office at No. 195, 674 01 Výčapy, ID No.: 11795255 (individually or collectively referred to as the "Company"), telephone: +420 953 311 111, email: [tedom@tedom.com](mailto:tedom@tedom.com), website: [www.tedom.com](http://www.tedom.com).

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3. Provisions common to partners, associates and visitors to the Company's premises.

### 1. INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR PARTNERS AND COLLABORATORS OF THE COMPANY

This notice applies to the processing of personal data of persons whose activities and cooperation are otherwise related to the Company's activities, in particular business partners – natural persons and contact persons of business partners – legal and natural persons (statutory bodies, employees, etc.) (hereinafter referred to as "Partners").

#### Data Protection Officer

The Company is not obliged to appoint a data protection officer within the meaning of Article 37 of the Regulation. The Company does not appoint a data protection officer.

#### Scope of personal data processed

The Company processes personal data provided to it by Partners in the course of normal business relations.

#### The personal data processed may therefore include, in particular:

Standard personal data – Partner's identification and contact details (first name and surname, position/function, designation of the person represented, email address, telephone number, etc.)

**Purpose of personal data processing and legal basis for processing**

Personal data is processed for the purpose of communication within the Company's normal business activities, in particular when fulfilling the Company's orders, and the related management of the Company's internal agenda (in particular concerning the protection of the Company's rights). Some personal data may be processed on the basis of the Company's legitimate interest, in particular for direct marketing purposes. In specific cases, processing may also be based on consent to the processing of personal data.

**Within the scope of these processing purposes, personal data will be processed in particular within the framework of:**

Attachments:

- a) communication within the scope of the Company's normal business activities, in particular when fulfilling the Company's orders (the Partner is a party to a contract with the Company); for the purpose of fulfilling a contract or taking measures prior to concluding a contract at the Partner's request (Article 6(1)(b) of the Regulation);
- b) communication within the scope of the Company's normal business activities, in particular when fulfilling the Company's orders (the Partner is a representative (employee, statutory body, etc.) of a party to a contract with the Company);
- c) protection of the Company's legal claims (in particular, proof of fulfilment of the Company's obligations towards the Partner or the person it represents)
- d) the Company's direct marketing activities – depending on the circumstances, sending commercial offers and/or information materials (news) of the Company,
- e) due to the legitimate interest of the Company or other persons within the meaning and under the conditions of Article 6(1)(f) of the Regulation.

**Sources of personal data**

The Company obtains the processed personal data from Partners within the scope of the Company's normal business activities, in particular when negotiating and executing the Company's orders, or through its own activities.

**Withdrawal of consent to the processing of personal data**

In cases where personal data is processed on the basis of consent, the provision of consent is always voluntary and the Partner has the right to withdraw their consent at any time, either in whole or in part. Consent may be withdrawn by written notice sent to the Company's registered office or email address as stated above. From the date on which the withdrawal of consent is notified to the Company, the Company will only process personal data to the extent justified by another legal reason for processing, i.e. in particular for the performance or conclusion of a contract with the Partner or for the purposes of protecting rights and legal claims as described above.

**Disclosure of data to other persons**

Personal data may be made available to entities within the TEDOM Group, including the parent company, as well as to persons authorised under special legal regulations (e.g. law enforcement authorities, etc.) and persons in the position of personal data processors working for the Company with whom the Company will cooperate.

**Period of storage of personal data**

Personal data will be processed and stored by the Company for as long as there are legal grounds for processing personal data, unless otherwise provided by applicable legal regulations (e.g. for the purposes of archiving tax documents, etc.).

**2. INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR VISITORS TO THE COMPANY'S PREMISES**

This notice applies to the processing of personal data of persons captured by a camera system operated by the Company (which may also include Company employees) (hereinafter referred to as "Guests").

**Scope of personal data processed**

The Company processes Guests' personal data in the form of video recordings of individuals, i.e. depending on the quality of the recording, the appearance of individuals and their behaviour within the monitored areas on the Company's premises:

- \* Výčapy 195; 674 01 Výčapy
- \* Hrotovická – industrial zone 160; 674 01 Třebíč
- \* Masarykova 1436; 268 01 Hořovice
- \* Belgická 4685/15; 466 05 Jablonec nad Nisou

**Monitored areas are marked with an information sign with the text:**

THESE PREMISES ARE MONITORED BY A CAMERA SYSTEM WITH RECORDING.

The data controller is TEDOM, a.s., ID No. 28466021.

Information on the processing of personal data is available at [www.tedom.com](http://www.tedom.com)

**Purpose of personal data processing and legal basis for processing**

Guests' personal data is processed for the purpose of protecting property (in particular against theft or damage) and the rights of the Company and third parties on the basis of the legitimate interests of the Company or other persons within the meaning and under the conditions of Article 6(1)(f) of the Regulation.

**Sources of personal data**

The Company obtains the personal data it processes through the operation of CCTV systems.

**Disclosure of data to other persons**

Personal data may be disclosed to entities within the TEDOM group, including the parent company, to persons authorised under special legal regulations (e.g. law enforcement authorities, etc.) and to persons in the position of personal data processors working for the Company with whom the Company will cooperate.

**Personal data storage period**

CCTV recordings containing personal data are stored for 7 days from the date of recording. If an incident is identified and resolved on the basis of the recording, the recording is stored to the extent necessary until the incident is finally resolved.

### 3. PROVISIONS COMMON TO PARTNERS, CO-WORKERS AND VISITORS TO THE COMPANY'S PREMISES

#### **Further information on rights in relation to the processing of personal data**

In addition to the rights already mentioned above, the Act and the Regulation also grant the persons – data subjects whose personal data are processed by the Company – the rights summarised below. The Company endeavours to accommodate data subjects in exercising these rights to the greatest extent possible.

Right of access to personal data pursuant to Section 28 of the Act: Upon request by a data subject, the Company shall inform them whether it processes personal data relating to them. If the Company processes such data, it shall provide it to the data subject and inform them in accordance with Section 28(1) of the Act. The Company shall act without undue delay.

Protection of rights under Section 49 of the Act: Any data subject who considers that the controller or processor is processing their personal data in a manner that is incompatible with the protection of the data subject's private and personal life or with this chapter, in particular if the personal data are inaccurate with regard to the purpose of their processing, may:

- request an explanation from the controller or processor, or
- request that the controller or processor remedy the situation, in particular by correcting, supplementing or deleting the personal data.

#### **According to the Regulation, the data subject has the following rights in particular:**

Right of access to personal data: The data subject has the right to obtain confirmation from the Company as to whether it processes his or her personal data and, if so, has the right to access such personal data.

Right to rectification or erasure, or restriction of processing: The data subject has the right (in cases specified by the Regulation) to request that the Company rectify or complete incorrect or incomplete personal data, request the erasure of personal data if the reason for its processing no longer applies or does not exist, or request to restrict the processing of personal data in connection with the resolution of circumstances surrounding the processing of personal data by the Company.

Right to object: The data subject has the right (in cases specified by the Regulation) to object to the Company's processing of their personal data for the purposes of the legitimate interests of the Company or other persons (according to the Regulation) for reasons relating to their particular situation.

Right to data portability: The data subject has the right (under the conditions set out in the Regulation) to obtain their personal data from the Company and transfer it to another personal data controller.

Right to lodge a complaint with a supervisory authority: The data subject has the right to lodge a complaint with a supervisory authority if they believe that the processing of their personal data has violated the Regulation. For data subjects residing in the Czech Republic, this supervisory authority will be the Office for Personal Data Protection.

If you have any questions on this matter, please contact the Company using the contact details above.