**Personal Data Protection Statement**

**KORAMEX a.s., with the registered office at Pražská 268, 342 01 Sušice, Company Identification No.: 00117366** (hereinafter referred to as the “*Controller*”), is governed especially by the 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”), and by the Act No. 101/2000 Coll., on Personal Data Protection, as amended, when processing the personal data.

**Definition of terms**
Data Subject: identified or identifiable natural person, i.e. for instance:
• employee of the *Controller*,
• applicant for job,
• external worker,
• supplier´s representative,

• customer,

• natural person – citizen,

• natural person with Company Identification No.

Personal data: any information on the natural person by means of which such person may be directly or indirectly identified, e.g. name, surname, date of birth, birth certificate No., location data (address), network identifier (phone No., email, social networks, etc.).

Special categories of personal data: special element of the physical, physiological, genetic, mental, economic, cultural or social identity of a natural person, i.e. personal data evidencing the national, racial or ethnic origin, political opinions, membership in trade unions, religion and philosophical opinion, conviction for crime, medical condition and sexual life, biometrical data enabling the direct identification or authentication of a data subject.

***Controller´s* responsibility**

As a *Controller,* we are responsible for any processing of your personal data within the agenda used by us in the company. Furthermore, we settle your requests (e.g. for rectification, erasure, information on your personal data), objections, and provide you with the information how and why we handle your personal data.

**Personal data processing principles**

When processing the personal data, we meet the highest level of personal data protection and observe especially the following principles:

a) we process the personal data always for a clearly and understandably determined purpose, by the determined means, in the determined manner, and only for a period which is necessary with respect to the purposes of its processing; we process only the accurate personal data and its processing corresponds to the determined purposes and is necessary to fulfil such purposes;

b) the personal data is protected in a manner corresponding to the current development of technology; the highest possible available level of security of such data is ensured whereas this level prevents from any unauthorized or accidental access to the personal data, its change, destruction or loss, unauthorized transfers, other unauthorized processing as well as misuse;

c) the data subjects are informed of the personal data processing and of the claims on accurate and complete information on the circumstances of such processing as well as of other related rights;

d) as a *Controller*, we keep the corresponding technical and organizational measures.

**Information on personal data processing**

*The Controller* processes the personal data especially to:

* Meet the obligations imposed by law whereas the *Controller* acts as a personal data *Controller*;
* Meet the contractual obligations whereas the personal data was provided by the data subjects;
* Meet the contractual obligations whereas the personal data was provided to the *Controller* by personal data controllers of the other party and the *Controller* acts as a processor;
* Meet the contractual obligations whereas the data subject is a contracting party;
* Protect the rights and legitimate interests of the *Controller*;
* For business and marketing purposes if the data subjects gave their consent or if it is a legitimate interest of the *Controller* in case of clients and cooperating entities of the company.

**Scope of processed personal data:**

*The Controller* processes the personal data within the scope necessary to meet the above-mentioned objectives. Mainly the following personal data is processed:

a) name and surname;

b) address;

c) email address;

d) phone No.;

f) IP address and other electronic identifiers;

g) Company Identification No.;

h) and other personal data that the *Controller* is obliged to administer based on specific legal titles in individual cases of the processed personal data.

*The Controller* does not process any special categories of personal data unless there is a legal ground to do so.

**Manner of personal data processing:**

The manner in which the *Controller* processes the personal data includes manual as well as automated processing in the *Controller´s* information systems. The personal data is processed especially by the *Controller´s* employees and within the necessary scope also by the third parties. Before the personal data is provided to the third party, an agreement is concluded with such third party, whereas the agreement contains the same warranties for personal data processing as observed by the *Controller* in accordance with its statutory obligations.

The *Controller* adopted the technical and organizational measures to ensure the personal data protection, especially the measures hindering from any unauthorized or accidental access to the personal data, its change, destruction or loss, unauthorized transfers, unauthorized processing as well as other misuse.

**Recipients of personal data**

The personal data is made available especially to the *Controller´s* employees in connection with meeting of their labor obligations upon which it is necessary to handle the personal data, however only within a scope necessary in the given case while observing all the security measures. The personal data may be provided to the third parties partaking in the personal data processing, eventually the personal data may be made available by another reason in accordance with the law. Before the personal data is provided to the third party, a written agreement is always concluded with such third party, whereas the agreement regulates the personal data processing so that it contains the same warranties for personal data processing as observed by the *Controller* in accordance with its statutory obligations.

In accordance with the relevant legal regulations, the *Controller* is entitled or directly obliged to provide your personal data especially to:

a) respective public administration bodies, courts and law enforcement authorities for purpose of meeting their obligations and for exercise of judgement;

b) providers of payment services if it is necessary to prevent from frauds in the field of payment, investigation or detection of frauds;

c) public administration entities and other public authorities to meet the statutory obligations;

d) other persons within the scope stipulated by the legal regulations, e.g. to the third parties to recover debts;

e) entities providing the *Controller* with the services based on outsourcing and acting as a personal data processor;

etc.

**Transfer of personal data abroad**

The personal data is processed in the territory of the Czech Republic; the personal data of clients is not transferred to the countries outside the European Union.

**Period of personal data processing**

The *Controller* processes the personal data only for a period that is necessary with respect to the purposes of its processing. The period of keeping the personal data results from the individual legal titles and regulations based on which the *Controller* processes the personal data. The storage period is in compliance with the *Controller´s* Document Management, Archiving and Destruction Rules.

**Rights of data subjects**

**1. Right to information**

Your right is to ask the *Controller* for the information what personal data, in what scope and for what purpose we process about you. We will provide you with such information in accordance with the GDPR principles, in extraordinary cases within 90 days at the latest. We will inform you in a timely manner of the extension of such period in extraordinary cases. If you ask us to provide you with the information we register on you, we will need to verify firstly whether you are really a person whom such information belongs to. Please identify yourself sufficiently in your request. If necessary, we are entitled to ask for additional information concerning your identity before providing you with the personal data we process in relation to you.

We are entitled to deny the requests for information, that are unreasonable or repeat unreasonably, eventually if their obtaining requires unreasonable efforts or if such information is difficult to obtain (usually from backup systems, archival documents, etc.).

**2. Data updates, right to rectification**

As the personal data may change over time (e.g. change of surname), we will be glad if you keep us informed of any change in relation to you so that we have your personal data updated and no possible errors incur. To inform us of any change of the data is necessary for us to execute properly our activity of the *Controller*. Your right to rectification of personal data we record about you is related to it. If you find out that our data is no more up-to-date, you have a right to ask for its rectification.

**3. Objections**

If you believe we do not process your personal data in compliance with the Czech and Union legislation, you have a right to raise an objection and we will verify the justification of your requirement. We are informing you that you are entitled to apply with the objection against the personal data processing by our company also to the relevant supervisory office for the personal data protection at the address:

**Office for Personal Data Protection (Úřad pro ochranu osobních údajů)**

**Pplk. Sochora 27**

**170 00 Praha** 7

**4. Right to erasure**

If you have given us a consent to processing of your personal data, you have a right to revoke it anytime and we will be obliged to erase the data we process solely based on your consent. The right to erasure does not apply to the processed data within the obligation to perform the agreement, statutory reasons or legitimate interests. If some of your personal data is stored in backup systems which ensure automatically the resistance of all our systems and have the protective function against any data loss in case of breakdowns, we may not erase such data also from the backup systems. In addition to that, it is often technically impossible. Nevertheless, such data will be no more actively processed and will not be used for any further purposes of processing.

**5. Right to limitation of processing**

This right means you are entitled to raise an objection against the processing of your personal data if you find out or if you believe your personal data is processed in conflict with the applicable legislation or the processing might jeopardize your rights or freedoms, which may happen in the following situations:

Right to rectification – you deny the accuracy of your personal data. You are entitled to ask us for the limitation of using the inaccurate data for a period when we, as a personal data *Controller*, verify the accuracy and correctness of personal data.

Processing of personal data is unlawful whereas you do not require its erasure but only the limitation of such personal data processing.

We, as a *Controller*, do not need the personal data for purposes of processing any more (and we should erase it) but you require it due to the determination, exercise or defence of legal claims.

You raise an objection against processing. It is necessary to limit processing of such personal data for a period when it is being verified whether the interests of our company (interests of a *Controller*) or your interests (interests of a data subject) prevail.

**6. Right to personal data portability**

1. As a data subject, you have a right to obtain the personal data which we register about you and which you have provided to the *Controller*, in a structured, commonly used and machine-readable format, and you have a right to provide this data to another controller without being hindered by the *Controller* whom the personal data was provided to, even in case the processing is based on a consent pursuant to Article 6 (1) a), or Article 9 (2) a), or on an agreement pursuant to Article 6 (1( b); and the data is processed in an automated manner.

2. When exercising your right to personal data portability pursuant to paragraph 1 you, as a data subject, have a right that your personal data is provided directly by one *Controller* to another one if it is technically feasible.

3. The exercise of a right specified in paragraph 1 of this Article does not affect Article 17. This right shall not be applied to the processing necessary to fulfil the task performed in the public interest or when executing public authority, which the *Controller* is entrusted with.

4. The right specified in paragraph 1 shall not negatively affect the rights and freedoms of other persons.

**7. Right not to be involved in automatic decision-making**

This right ensures that you, as a data subject, will not be subject to any decision-making based solely on automated processing, including profiling, that has legal effects on you or that affects you significantly in a similar manner. In other words, this ensures that the legal effects are not decided by automated processes without any human interference, except for any possible exemptions.

The automated decision-making is accessible in case it is necessary to conclude or perform an agreement between you and the *Controller*, if permitted by the EU law or by a Member State, or if based on your express consent.

**You can apply to**

You can send your inquiries concerning the personal data protection to the email address: koramex@koramex.cz or to the *Controller´s* registered office:

**KORAMEX a.s.**

Pražská 268

342 01 Sušice