

GDPR PRIVACY NOTICE

Information on the processing of personal data pursuant to Regulation (EU) 2016/679 (GDPR)

The controller of your personal data is:	VerticalBlock s.r.o.
Registered office:	U Soudu 6200/19, Poruba, 708 00 Ostrava
Company Registration No.:	17445078
Commercial register:	Registered in the Commercial Register maintained by the Regional Court in Ostrava, file no. C 90189
Controller's contact person for personal data protection:	Bc. Dominika Chlebková, e-mail: dominika@hangarbrno.cz

The controller has not appointed a Data Protection Officer (DPO).

1. Purpose of the document

VerticalBlock s.r.o., with its registered office at U Soudu 6200/19, Poruba, 708 00 Ostrava, Company Registration No.: 17445078, registered in the Commercial Register maintained by the Regional Court in Ostrava, file no. C 90189 (hereinafter referred to as „VerticalBlock“), hereby fulfils the information obligation arising from Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation) (hereinafter referred to as the „GDPR“), and from other related regulations forming the legal framework for the protection of personal data.

This document provides information on the processing of personal data by VerticalBlock (hereinafter also referred to as the „Controller“), in particular on which personal data VerticalBlock processes in the course of its activities, including information on the time period for which and the reason why it does so. The information further covers the rights and obligations of data subjects under the GDPR and the ways in which they may be exercised.

2. Categories of personal data

Personal data means any information relating to an identified or identifiable natural person. In the course of its activities, VerticalBlock processes the following categories of personal data:

- name, address and contact details;
- data necessary for negotiating, concluding and performing contracts, in particular data on services provided or received;
- data on communication between the customer and VerticalBlock, data related to the negotiation and performance of contracts for the provision of services (or the sale of

goods);

- recordings from security cameras on VerticalBlock's premises;
- data on visits to premises and events organised by VerticalBlock;
- data obtained on the basis of the data subject's consent, for example customer preferences and data on the use of services;
- data necessary for the fulfilment of various legal obligations and data whose processing is necessary for the purposes of the legitimate interests of VerticalBlock (see Section 3 of this Information).

If the data subject refuses to provide VerticalBlock with personal data, VerticalBlock cannot provide the service in question or deliver the goods.

3. Processing of personal data

All personal data provided to VerticalBlock is processed for a specified purpose, and such personal data is never processed in a manner that is incompatible with those purposes.

VerticalBlock always processes personal data only for the period necessary to fulfil the relevant purpose, with the exception of the processing of personal data on the basis of a legal regulation, which takes place for the period stipulated by the relevant legal regulation.

3.1 Processing of personal data based on the data subject's consent

The purpose of processing personal data for which consent is required is, in particular, improving the quality of services, offering tailor-made services to customers, or approaching customers and potential customers (by telephone, electronically, in writing, by other forms of advertising and other means). This includes the processing of data on customer behaviour when using the Controller's services and purchasing the Controller's products.

Personal data obtained on the basis of consent may be processed exclusively for the period of validity of the consent granted. The granting of consent is voluntary and the consent may therefore be withdrawn at any time. The withdrawal of consent must be made by an express, comprehensible and definite expression of will.

Consent is not required for the processing of personal data to the extent necessary for the performance of a contract, to the extent required by legal regulations, and to the extent necessary for the protection of the Controller's legitimate interests.

3.2 Processing of personal data within contractual agendas

The negotiation, performance and conclusion of contracts between the Controller and its clients and contractual partners involves the processing of personal data, in particular in connection with the provision of services.

This processing also includes records in contractual registers, in overviews of clients, suppliers and subcontractors, and of the Controller's staff.

3.3 Processing of personal data within legal obligations

The Controller is also obliged to process personal data in order to fulfil obligations arising from legal regulations (acts, decrees, EU regulations and other applicable legal regulations).

The Controller processes personal data in operational and administrative activities imposed by other legal regulations. These concern in particular the fulfilment of obligations arising from accounting and tax regulations and related regulations; the keeping of employee records pursuant to labour-law and payroll regulations; the fulfilment of administrative and archiving obligations, including records of incoming and outgoing mail; the operation and security of data management tools (including personal data), IT systems and data storage; the fulfilment of reporting and notification obligations towards public authorities; the fulfilment of obligations relating to the enforcement of judicial and administrative decisions and execution proceedings or insolvency proceedings, and other similar obligations stipulated by legal regulations.

3.4 Processing of personal data based on the Controller's legitimate interest

The controller of personal data is entitled to process personal data when asserting and enforcing claims and receivables, in particular against suppliers, employees and clients, including the recording of debts and debtors and the conduct of administrative and judicial proceedings.

The Controller is further entitled to process personal data when protecting property and when managing and operating real estate, including ensuring security and operating a camera system.

3.5 Processing of personal data for the purposes of commercial communications

The Controller processes electronic contacts for the purposes of disseminating its own commercial communications. The Controller's commercial communications are clearly marked as commercial communications and do not conceal the identity of the sender. Recipients have the option to refuse their sending at any time. This option and the relevant contact for sending a refusal are always stated in the commercial communication.

The Controller also processes personal data for the dissemination of its commercial communications on the basis of consent to the processing of personal data for marketing and commercial purposes.

4. Recipients of personal data and sharing with other controllers

The Controller transfers personal data to another controller where so stipulated by a legal regulation, where this is necessary for the purposes of performing a contract, or for the protection of the legitimate interest of the Controller or a third party, unless the interest of the data subject takes precedence over those interests. In other cases, the Controller transfers personal data to another controller exclusively on the basis of the data subject's consent. The granting of consent is a voluntary decision of the data subject, to which the data subject is in no way compelled.

In the course of its activities, the Controller uses the services of specialised professional entities, for example lawyers, auditors, IT system suppliers, marketing professionals, experts or sales representatives. These persons generally act in the position of a processor of personal data, with all the obligations associated therewith, and handle the data in accordance with the Controller's instructions. Where personal data is transferred to entities acting in the position of a controller of personal data, the legal framework for the protection of personal data set out in the GDPR and other related regulations applies to

them – this guarantees data subjects a high level of personal data protection. The transfer of personal data to third parties always takes place in accordance with the relevant legal regulations while preserving the rights of data subjects.

5. Rights of the data subject

The precondition for exercising the rights of the data subject under the GDPR is, in connection with the processing of personal data by the Controller as specified in the following points of this Section 5, the proper proof of the identity of the data subject, enabling the necessary identification of the data subject or other authorised person.

5.1 Right to be provided with information

Under the conditions set out in Articles 13 and 14 of the GDPR, the Controller shall provide the data subject with information concerning the processing of personal data, always at least to the extent to which the data subject does not already have such information. This concerns in particular the contact details of the Controller, the purposes of processing the personal data, the categories of personal data concerned, any recipients or categories of recipients of the personal data, and any intention of the controller to transfer the personal data to a recipient in a third country or international organisation. The scope of the information provided and the time of its provision vary according to the specifics of the particular case, always in accordance with the specification arising from the GDPR.

Similarly to the paragraph above, the Controller proceeds in cases where it intends to further process personal data for a purpose other than that for which it was obtained. In such situations, the Controller shall provide the data subject with the necessary information prior to such further processing.

5.2 Right of access to personal data

Under Article 15 of the GDPR, the data subject has in particular the right to obtain from the Controller confirmation as to whether or not personal data concerning them is being processed. Where such data is being processed, the data subject has the right to obtain access to it.

The data subject further has the right to information about (a) the purpose of processing the personal data, (b) the categories of personal data concerned, (c) the recipients or categories of recipients of the personal data, (d) the planned period for which the personal data will be stored, (e) the existence of the right to request from the Controller the rectification, erasure or restriction of processing of personal data and the possibility to object to the processing of personal data, (f) the right to lodge a complaint with a supervisory authority, (g) the source of the personal data, (h) the fact that automated decision-making, including profiling, is taking place, (i) the measures taken when transferring personal data to countries outside the EU/EEA.

5.3 Right to rectification

Under Article 16 of the GDPR, the data subject has the right to have the Controller rectify, without undue delay, inaccurate personal data concerning them. Taking into account the purposes of the processing, the data subject also has the right to have incomplete personal data completed, including by providing a supplementary statement.

5.4 Right to erasure („right to be forgotten“)

Under Article 17 of the GDPR, the data subject has the right to have the Controller erase, without undue delay, personal data concerning them, and the Controller has the obligation to erase the personal data without undue delay, in particular in cases where (a) the personal data is no longer necessary for the purposes for which it was collected or otherwise processed, (b) the data subject withdraws the consent granted and there is no other legal ground for the processing, (c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing, (d) the personal data has been processed unlawfully, (e) the personal data must be erased in order to comply with a legal obligation of the Controller, or (f) the personal data was collected in connection with the offer of information society services to a child. The exceptions where the right to erasure cannot be claimed arise in particular from the fulfilment of obligations stipulated by legal regulations.

5.5 Right to restriction of processing

Under Article 18 of the GDPR, the data subject has the right to have the Controller restrict the processing of personal data where (a) the data subject contests the accuracy of the personal data, (b) the processing of personal data by the Controller is unlawful and the data subject opposes its erasure and requests restriction instead, (c) the Controller no longer needs the personal data for the purposes of processing but the data subject requires it for the establishment, exercise or defence of legal claims, or (d) the data subject has objected to the processing and the conflicting legitimate interests are being weighed.

The data subject shall be informed in advance by the Controller before the restriction of processing is lifted. The exceptions where the right to restriction of processing cannot be claimed arise in particular from the fulfilment of obligations stipulated by legal regulations.

5.6 Notification regarding rectification, erasure or restriction of processing

Under Article 19 of the GDPR, the data subject has the right to have the Controller communicate any rectification, erasure or restriction of processing of personal data to the individual recipients of the personal data. This does not apply where it proves impossible or involves disproportionate effort. The data subject must be informed about the recipients if they request this information.

5.7 Right to data portability

Under the conditions of Article 20 of the GDPR, the data subject has the right to receive the personal data they have provided to the Controller in a structured, commonly used and machine-readable format. The data subject further has the right to transmit this data to another controller or to request the Controller, where technically feasible, to transmit it directly to that other controller.

5.8 Right to object

Under Article 21 of the GDPR, the data subject has the right, on grounds relating to their particular situation, to object at any time to the processing of personal data concerning them which is processed by the Controller for the performance of a task carried out in the public interest or in the exercise of official authority, or for the purposes of the legitimate interests of the Controller as a controller or of a third party. If, in these cases, the Controller does not demonstrate compelling legitimate grounds for the processing which

override the interests or rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims, the Controller shall no longer process the personal data.

Where the data subject objects to the processing of personal data collected for the purposes of direct marketing, which also includes profiling, the personal data shall no longer be processed by the Controller for these purposes.

5.9 Automated individual decision-making, including profiling

Under Article 22 of the GDPR, the data subject has the right not to be subject to any decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

The Controller does not make any decisions with legal effects for the data subject based solely on automated processing, including profiling. Each such decision is, as a matter of principle, made after assessment by a qualified person competent to do so.

5.10 Notification of personal data breaches

Under Article 34 of the GDPR, the data subject has the right to be informed by the Controller if a personal data breach occurs which is likely to result in a high risk to the rights and freedoms of natural persons.

6. Requests, complaints, objections or suggestions of data subjects

The GDPR grants data subjects numerous rights intended to ensure a high level of protection of their personal data. The Controller always considers the protection of personal data and the privacy of data subjects to be a priority. With regard to your rights, please do not hesitate to contact us at any time with any requests, complaints, objections (including a qualified objection under Article 21 of the GDPR), queries or suggestions (hereinafter jointly referred to as a „Request“).

In any matter concerning personal data, the Controller may be contacted via the e-mail address (see point 8 of this Information) or in writing at the address of its registered office.

Where the Request contains all the necessary data and relevant information for its handling, the Controller will contact the applicant and inform them of the measure taken.

Where the Request does not contain all the necessary data and relevant information for handling the matter, the Controller will contact the applicant with a request to supplement the Request.

In order to verify the legitimacy of the Request and to handle it properly, the applicant may be asked to prove their identity or to provide other necessary information.

THE OFFICE FOR PERSONAL DATA PROTECTION

The data subject has the right to lodge a complaint at any time with the Office for Personal Data Protection (Úřad pro ochranu osobních údajů, Pplk. Sochora 27, 170 00 Prague 7, www.uouu.gov.cz, posta@uouu.gov.cz, tel. +420 234 665 111).