



METAL TRADE COMAX, a.s.

Sídliště 420, postal code 273 24, Czech Republic (CZ)

Information memorandum on personal data processing

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1. WHO IS THE PERSONAL DATA CONTROLLER?

The personal data controller is METAL TRADE COMAX, a.s., registered office: Velvary 420, 273 24 Velvary; identification number 49684442; registered in the Commercial Register maintained by the Municipal Court in Prague, file number B 11701.

2. WHO IS THE DATA PROTECTION OFFICER?

The controller has appointed an officer responsible for the management and protection of personal data. This officer is JUDr. Blanka Vaigeltovej, whom you can write to at gopr@mtcomax.cz, or call at +420 315 730 730.

3. FOR WHAT PURPOSE DO WE PROCESS YOUR PERSONAL DATA?

The processing carried out by the controller varies depending on your relationship with us.

If you are seeking a job at our company, then we process your personal data:

- on the basis of our **legitimate interests or the legitimate interests of third parties (Art. 6 par. 1 subpar. f)**, and we use them for:
 - o recruitment and the selection process for a vacant job position;
 - o searching for suitable candidates on the free market.

If you are a visitor at our company, then we process your personal data:

- on the basis of our **legitimate interests or the legitimate interests of third parties (Art. 6 par. 1 subpar. f)**, and we use them to:
 - o perform random inspections of vehicles and persons;
 - o manage access to the company, including registration of vehicles and persons.

If you are a visitor to our website, or a participant in public or private events of our company, then we process your data:

- on the basis of our **legitimate interests or the legitimate interests of third parties (Art. 6 par. 1 subpar. f)**, and we use them to:
 - o publish articles, interviews, photos and videos on social media and YouTube, exclusively to promote the company's products or brand;
 - o manage the protection of property and persons on the company's premises, where we record you on camera to monitor your movement on the company's premises, and:
- on the basis of **contractual obligation (Art. 6 par. 1 subpar. b)**, we use your personal data to:
 - o provide security for rented non-residential premises;
 - o mediate sales through the company's agent (representative).

If you are a student with a professional internship at our company, then we process your personal data on the basis of a **contractual obligation (Art. 6 par. 1 subpar. b)**, and use them to:

- o perform the contract for professional experience concluded between the school and our company.

If you are our customer, we process your personal data:

- on the basis of our **legitimate interests or the legitimate interests of third parties (Art. 6 par. 1 subpar. f)**, and we use them to:
 - o keep a record of participants in our public events;
 - o evaluate site traffic and for inspections in the sending of informative emails;
 - o publish articles, interviews, photographs and videos on social media and YouTube, exclusively to promote the company's products or brand, and:
- on the basis of **contractual obligation (Art. 6 par. 1 subpar. b)**, we use your personal data to:
 - o lease non-residential spaces;
 - o prepare a draft contract based on your request;
 - o prepare contracts for the sale of company assets;
 - o operate the complaints portal;
 - o perform activities related to the sale of goods, such as the delivery of goods ordered by you, contacting you for the pick-up of manufactured goods, contacting you for the purpose of sending you an offer, conducting a survey for the compilation of a request/offer, preparation of a purchase contract and advance invoice, preparation of an offer and a laying pattern, securing a contractual carrier, processing your request or mediation of sales by an agent (representative) of our company.

If you are our suppliers or partners, then we process your personal data:

- on the basis of our **legitimate interests or the legitimate interests of third parties (Art. 6 par. 1 subpar. f)**, and we use them to:
 - o keep a record of participants in our company's public events;
 - o publish articles, interviews, photographs and videos on social media and YouTube;
 - o evaluate site traffic and for inspections in the sending of informative emails;
- on the basis of **contractual obligation (Art. 6 par. 1 subpar. b)**, we use your personal data to:
 - o provide construction work at our company;
 - o contact you for the purpose of sending an offer, or delivering goods to the customer.

Giving personal data to data controllers is generally a legal and contractual requirement. The provision of personal data for marketing purposes, which does not constitute the fulfilment of the controller's contractual and legal obligation, necessitates your consent. If you do not give the controller your consent to the processing of your personal data for marketing purposes, this does not entitle the controller to refuse to provide you his product or service under the contract as a result.

We use your consent (Art. 6, par. 1, subpar. a) to the processing of personal data for the processing purposes listed below, and only if you give us your consent:

- based on feedback from the customer or from the implementers, we take photographs of the implementation and publish it on our website, in our catalogues or in our magazine, including your references, if you give them to us;
- if you decide you want to receive our newsletter;
- if you participate in corporate or public events, training and workshops organized by us;
- if you participate in trade fairs, exhibitions, excursions and tours organized by us, where we receive your contact details;
- if you participate in our preparation and promotion of PR articles;
- if you take part in a field trip as a student, then you can leave your contact details so we can reach out to you with a job offer.

You can revoke this consent at any time and we will erase your personal data that can be erased. However, we are not able to erase certain data whose processing you consent to, especially if you give your permission for us to use them in PR articles and videos created for the purpose of marketing and promoting the company, in news with your references that we send to clients by email if they ask for them, etc.

4. HOW DID WE OBTAIN YOUR PERSONAL DATA?

The controller obtained your personal data directly from you, from filled out forms, mutual communication, or concluded contracts. Personal data may also come from publicly available sources, registers and records, e.g. from the Commercial Register, the register of debtors, professional registers or the Land Registry. The controller may also obtain your personal data from third parties who are authorised to access and process your personal data and with whom he cooperates, as well as from social networks media and the Internet that you have placed there yourself.

5. WHAT CATEGORIES OF PERSONAL DATA DO WE PROCESS?

To ensure your satisfaction from proper fulfilment of our obligation, to ensure the fulfilment of legal obligations, to provide a personalised offer of the controller's goods and services, and for the other purposes listed above, we process the following categories of personal data:

- a) **basic identification data** – your name, surname, date of birth, residential address, birth number and identification number, signature;
- b) **contact details** – telephone number and email address;
- c) **information about the use of the controller's products and services** - information about products you have ordered from the controller and which you are using now;
- d) **information from mutual communication** – information from emails, from contact forms on the website;
- e) **billing and transaction data** – information appearing on invoices, information on agreed invoicing terms and received payments, bank account numbers;
- f) **information about a fulfilled order** - especially drawings, documentation, photo documentation, references;
- g) **for students** – information about their school, field of study, year of study, language skills, experience and the type of potential cooperation;
- h) **information about inspections carried out during entry onto the company's premises**, potential video recordings from the premises;
- i) **information about website traffic** - where the IP address and page opening location are, the time spent on a page, the date and time on which a page was opened, the most frequent time when a page is opened, cookies;
- j) **CV information** that you provide yourself in your CV.

6. HOW DO WE PROCESS AND RETAIN YOUR PERSONAL DATA?

We process data in an automated manner with the use of computers and computer programmes.

7. WILL WE TRANSFER YOUR DATA TO A THIRD PARTY?

In order to fulfil our obligations to you, we need to use third-party processors for the processing of certain data when they ask for them and have legal reasons to do so. The list of recipients of your personal data is complete and we will inform you of any changes in processors.

List of processors/third parties or recipients

- ADVENT, spol. s r. o., Prague 6, Na Beránce 57/2, 160 00, registered in the Commercial Register maintained by the Municipal Court in Prague, section C, file No 33467
- NAVISYS s.r.o., Florianova 1158/16, Královo Pole, 612 00 Brno, registered in the Commercial Register maintained by the Regional Court in Brno, section C, file No 26585
- Sales agents in different countries (UK, FR, CR)
- Insurance companies collecting claims:
 - o Atradius Crédito y Caución S.A. de Seguros y Reaseguros, Czech branch, Karolinská 661/4, Karlín, 186 00 Prague 8, registered in the Commercial register maintained by the Municipal Court in Prague, section A, file No 77616
 - o Credendo - Short-Term EU Risks úvěrová pojišťovna, a.s., Prague 4, Na Pankráci 1683/127, 1400, registered in the Commercial Register maintained by the Municipal Court in Prague, section B, file No 9958
 - o EULER HERMES SA, organizační složka, Prague 8, Molákova 576/11, 186 00, registered in the Commercial Register maintained by the Municipal Court in Prague, section A, file No 74831
 - o Euler Hermes Services Česká republika, Prague 8, Molákova 576/11, 186 00, registered in the Commercial Register maintained by the Municipal Court in Prague, section A, file No 74831
 - o Coface Czech Credit Management Services, spol. s r.o., Prague 2, náměstí I.P.Pavlova 1789/5, 120 00, registered in the Commercial Register maintained by the Municipal Court in Prague, section C, file No 3426
 - o Coface Czech Insurance Service s.r.o., náměstí I. P. Pavlova 1789/5, Nové Město, 120 00 Prague 2, registered in the Commercial Register maintained by the Municipal Court in Prague, section C, file No 128894
- Advokátní kancelář LEUCHTER & LEUCHTEROVÁ, s.r.o. (law firm), Mikulandská 122/4, Nové Město, 110 00 Prague 1, registered in the Commercial Register maintained by the Municipal Court in Prague, section C, file No 156919
- BDO Advisory s.r.o., Karolinská 661/4, Karlín, 186 00 Prague 8, registered in the Commercial Register maintained by the Municipal Court in Prague, section C, file No 107235
- BLESK Servis s.r.o., Ocelářská 1272/21, Libeň, 190 00 Prague 9, registered in the Commercial Register maintained by the Municipal Court in Prague, section C, file No 118507
- external carrier companies (CZ and PL)
- JABLOTRON ALARMS a.s., Pod Skalkou 4567/33, 46601 Jablonec nad Nisou; registered at the Regional Court in Ústí nad Labem, section B, file No 1957
- LMC s.r.o., Jankovcova 1569/2c, 170 00 Prague 7, registered in the Commercial Register maintained by the Municipal Court in Prague, section C, file No 82484
- SmartSelling a.s., Netroufalky 797/5, Bohunice, 625 00 Brno, registered in the Commercial Register maintained by the Regional Court in Brno, section B, file No 7559
- Webnode CZ s.r.o., Hlinky 995/70, Staré Brno, 603 00 Brno, registered in the Commercial Register maintained by the Regional Court in Brno, section C, file No 31249

Under the law, we are also required to give personal data to state administration authorities, such as tax authorities, courts, law enforcement authorities and capital market regulatory authorities.

8. WILL WE TRANSFER YOUR PERSONAL DATA TO A THIRD COUNTRY OR INTERNATIONAL ORGANIZATION?

We will not transfer personal data to countries outside the EU or the European Economic Area, or to any international organization. If such a situation should arise, we will always ask for your consent.

9. HOW LONG WILL WE RETAIN YOUR PERSONAL DATA FOR?

Your personal data will be processed and retained for at least the duration of the contract, or based on our legitimate interests. We will not retain this data for longer than 5 years starting from the year following the creation of the retained fact. Some personal data needed for tax or billing obligations will be retained longer, but not longer than the statutory minimum:

- Your email address, first name, last name, function, company, phone number, IP address, place of page opening, time spent on the page, date and time of web page opening, time of most frequent page opening, date of birth, knowledge and experience, field of education, vehicle registration plate, the result of the the company's gatekeeper inspection, the visitor's signature, which are important for the controller to exercise his legitimate interests, will be kept **for a maximum of 3 years from the end of the contractual relationship with the controller.**
- Personal data obtained for the purpose of **protecting property and persons on the company's premises** will be retained for a maximum of **7 days** from the date on which they were taken.
- Personal data processed for **marketing purposes** will be retained for a maximum of **3 years** from their acquisition.

After the retention period has expired, the personal data will be securely and irretrievably destroyed to prevent their misuse.

10. WHAT ARE YOUR RIGHTS RELATED TO THE PROCESSING OF PERSONAL DATA AND HOW CAN YOU EXERCISE THEM?

The right to information about processing of your personal data

You have the right to ask the controller whether or not your personal data are being processed. If your personal data are being processed, you have the right to request information from the controller, especially concerning the controller's identity and contact details, his personal data protection officer, the purposes of processing, the categories of personal data concerned, recipients or categories of recipients of personal data, authorised controllers, a list of your rights, the possibility to contact the Office for Personal Data Protection, the source of the processed personal data, and automated decision-making and profiling.

If the controller intends to process your personal data further for a purpose other than that for which they were obtained, he must inform you of this other purpose and other relevant information before this processing. The information provided to you in your exercise of this right is already contained in this memorandum, but this does not prevent you from requesting it again.

The right to access your personal data

You have the right to ask the controller whether he is processing your personal data or not, and if he is, you have the right to access information about the purposes of processing, the categories of personal data concerned, the retention period, recipients or categories of recipients of personal data, information about your rights (the right to request rectification or erasure, to restrict processing, to object to this processing), your

right to file a complaint with the Office for Personal Data Protection, the source of the processed personal data, whether automated decision-making and profiling is used, information concerning the procedure used, as well as the importance and anticipated consequences of this processing for you, and information and guarantees if your personal data is transferred to a third country or an international organization. You have the right to copies of your processed personal data. However, the rights and freedoms of other persons must not be adversely affected by your right to obtain this copy.

Right to rectification

If there has been a change in your residence, telephone number or another fact that can be considered personal data, you have the right to ask the controller to rectify the processed personal data. You also have the right to add data to incomplete personal data, including an additional statement.

The right to erasure (right to be forgotten)

In certain specified cases, you have the right to request the erasure of your personal data. This includes situations when the processed data are no longer needed for the aforementioned purposes. The controller erases the personal data automatically after the expiry of the necessary period, but you can contact him at any time with your request. Your request is subject to an individual assessment (despite your right to erasure, the controller may have an obligation or legitimate interest to retain your personal data), and you will be informed of its handling.

The right to restrict processing

The controller only processes your personal data to the extent that is strictly necessary. However, if you feel that the controller is exceeding the above stated purposes for processing your personal data, for example, you can submit a request that your personal data be processed exclusively for the most necessary legal reasons, or that your personal data be blocked. Your request is subject to an individual assessment, and you will be informed of its handling.

The right to data portability

If you want the controller to transfer your personal data to another controller, or to another company, the controller will transfer your personal data in the appropriate format to the entity designated by you, if there are no legal or other significant obstacles preventing him from doing so.

The right to object to automated individual decision-making

If you discover or believe that the controller is processing your personal data in violation of the protection of your private and personal life, or in violation of the law (provided that the personal data is processed by the controller on the basis of public or legitimate interest, for the purposes of direct marketing, including profiling, for statistical purposes, or for purposes of scientific or historical significance), you can contact the controller and request an explanation or remedy of this situation. You can also object directly to automated decision-making, including profiling.

The right to file a complaint with the Office for Personal Data Protection

You can contact the supervisory authority, namely the Office for Personal Data Protection, registered office: Pplk. Sochora 27, 170 00 Prague 7, website: <https://www.uoou.cz/>, at any time.

The right to revoke your consent

You have the right to revoke your consent to the processing of your personal data at any time, either by filling out a form/checking a box/sending the revocation to the controller's address, or via a link in an email, depending on how this consent was obtained.

How can you exercise your rights?

You can exercise your rights in the form of a written request sent to our correspondence address: Velvary 420, 273 24, with an officially verified signature, via data box, or in person if you visit one of our branches, where we will verify your identity. We must verify your identity to prevent the violation of the privacy of another natural person in the steps leading to the exercise of your rights.

All communications and statements regarding your rights are provided by the controller free of charge. However, if your request is clearly unfounded or unreasonable, especially if it is repeated, the controller is entitled to charge a reasonable fee taking into account the administrative costs associated with providing the requested information. In the event of repeated requests for copies of the processed personal data, the controller reserves the right to charge a reasonable fee for administrative costs for this reason.

The controller will provide a statement and information about the measures taken as soon as possible, no later than within one month. The controller is entitled to extend this period by two months, if necessary, taking into account the complexity and number of requests. The controller will inform you of this extension, including the reasons for it, no later than 30 days after receiving your request.

11. ARE YOUR PERSONAL DATA AUTOMATICALLY EVALUATED?

Personal data are not evaluated or otherwise processed and cannot be used for profiling or automatic decision-making in the field of marketing or other activities of the controller.

12. FINAL PROVISIONS

All legal relationships arising on the basis of or in connection with the processing of personal data are governed by the law of the Czech Republic, regardless of where they were accessed. Any disputes arising in connection with the protection of privacy between you and METAL TRADE COMAX, a.s., registered office: Velvary 420, 273 24 Velvary, identification number 49684442, registered in the Commercial Register maintained by the Municipal Court in Prague, file number B 11701, are to be resolved by Czech courts that will apply Czech law.

We can and will regularly amend this Information Memorandum. You will be informed of any changes at least 30 days before they come into effect.

This public notice on personal data protection came into effect on 25 May 2018, and was last updated on 30 April 2023.

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CRN: 49684442 | VAT No: CZ49684442

Registration in the Commercial Register maintained by the Municipal Court in Prague, section B, file No 11701

