

## Information on processing of personal data

The personal data controller LPP s.r.o., with its registered office at Pod Hájkem 406/1a, Prague 8 - Libeň, ID No. 08629056 (hereinafter referred to as the "Controller") provides, in accordance with Article 12 et seq. 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), the following information on the processing of personal data is provided to data subjects.

If necessary, data subjects may contact the Controller using the contact details provided below:

Delivery address: Pod Hájkem 406/1a, Praha 8 – Libeň, 180 00  
e-mail address: info@lp-praha.cz  
phone: +420 605 295 772

The processing of personal data is carried out for the purpose of proper management of prescribed agendas based on legal regulations that directly impose the processing of personal data (e.g. personnel and payroll, OSH and Fire protection, bookkeeping, tax documents...) and processing necessary for the conclusion and performance of contracts to which the data subject is a party.

Personal data are also processed for the purpose of protecting the rights and legitimate interests of the Controller or third parties who assist LPP s.r.o. in the performance of its obligations under contracts and by law. These parties (e.g. persons who perform audits for us, external legal representatives and consultants, security, IT administrator, ... ) may have access to personal data when providing these professional services, but only to the extent strictly necessary to fulfil the purpose of the services provided. Legitimate interests are the defence of claims in the performance of tasks related to the business of the administrator (defence of contractual claims, performance of obligations under the contract, contract negotiations, ... ), protection of life and health of persons, protection of property and information (operation of the camera system and security systems of the administrator), debt recovery and dispute resolution, archiving, keeping a visitors' book, records of vehicle entries and exits to the premises of LPP s.r.o.

The legal basis for processing is:

- Consent of the data subject to the processing of their personal data (Article 6(1)(a) of the General Data Protection Regulation). The processing of personal data on the basis of the data subject's consent shall be carried out solely for the purpose stated in the consent, which shall always be communicated to the data subject before the consent is given.
- Necessary processing for the performance of a contract to which the data subject is a party or for the implementation of pre-contractual measures taken at the request of the data subject (Article 6(1)(b) of the GDPR).
- Necessary processing for compliance with a legal obligation to which the Controller is subject (Article 6(1)(c) of the GDPR).
- Necessary processing for the purpose of the legitimate interests of the Controller or third party concerned, except where those interests are overridden by the interests or fundamental rights and freedoms of the data subject requiring the protection of personal data, in particular where the data subject is a child (Article 6(1)(f) of the General Data Protection Regulation). In those cases, the Controller always carries out a 'balancing analysis' before processing, which results in a conclusion as to whether the personal data can be processed.

The Controller processes the following categories of personal data:

- identification, address and contact details of employees and their family members, customers and employees of contractual partners
- identification, address and contact details of contractual partners who are self-employed
- details of the employer, job title or function of the employees
- details of the job title or function, work experience or qualifications, education, schooling and studies of job applicants and employees
- tax, bank, and payroll data of employees
- accounting and tax data, payment and pricing data of contractual partners and customers
- descriptive data from CCTV systems of persons entering the premises monitored by the CCTV system
- technical identification and access data of employees and other authorised persons

If the personal data are not obtained from the data subject, they are obtained from public sources (e.g. commercial register, ARES, trade register, VAT register, LinkedIn, Facebook and other social networks, ...) and from other sources (employees, contractors and public authorities).

The recipients of personal data are entities to which the Controller is obliged to provide personal data on the basis of the relevant generally binding legal regulations (tax administration, CSSA, health insurance companies, employment offices, ... ), contractors (suppliers and customers), agents, law enforcement authorities, administrative authorities, commercial insurance companies, or other authorised entities with regard to specific processing. The recipient of personal data is not entities whose activities are not related to the activities and services provided by the Controller, unless the data subject has given their consent.

The Controller transfers personal data of its employees to third countries and international organisations for the purpose of fulfilling contracts in the performance of the employees' duties. Information on data protection, the existence of appropriate safeguards and the locations of disclosure of personal data is provided by the Controller to the data subject prior to the transfer of personal data or at the request of the data subject at the above-mentioned contacts.

Personal data are stored for the period of time specified by the relevant generally binding legal regulations, insofar as they impose or allow such processing. In other cases, the period of storage of personal data is determined as the period necessary to exercise the rights or legitimate interests of the Controller or third parties or as the period necessary to defend legal claims of the Controller or third parties. The storage period for personal data is also determined by the relevant requirements of European Union regulations, in particular in the area of subsidies. When determining the storage period of personal data, all aspects of the processing in question and the interests of the data subject shall be taken into account. We always process your personal data for the duration of our cooperation. Even after that, we may process it if the legal regulations of the Czech Republic so provide or if we need to do so to protect our rights or legitimate interests (in particular for the purposes of debt recovery or the settlement of mutual disputes).

In cases where the processing of personal data is based on the performance of legal obligations and the provision of personal data is a legal requirement, the data subject is obliged to provide personal data. Failure to provide personal data may result in the failure to comply with the legal requirements, which may lead to the frustration of the actions carried out. Where the provision of personal data is a contractual requirement or a requirement that must be included in a contract (and is not in fulfilment of a legal obligation), a refusal by the data subject to provide personal data may result in a situation where the contract cannot be concluded. However, the Controller does not make the conclusion of a contract conditional on the provision of personal data by the data subject which are not necessary for the proper conclusion of the contract.

The processing of personal data does not involve automated decision-making. Profiling is not used by the Controller.

The Controller shall not process personal data directly communicated by the data subject for purposes other than those communicated to the data subject at the time of transmission. If the Controller intends to process those personal data for other purposes, it shall provide the data subject with information about that other purpose, as well as other information necessary for the exercise of their rights, before the actual processing begins.

The data subject also has the following rights:

- Where the processing is based on Article 6(1)(a) of the GDPR or Article 9(2)(a) of the GDPR, i.e. the processing of personal data is carried out with the consent of the data subject, the data subject shall have the right to withdraw the consent at any time, without prejudice to the lawfulness of the processing based on the consent given prior to its withdrawal.
- File a complaint with the supervisory authority, which is the Office for Personal Data Protection ([www.uoou.cz](http://www.uoou.cz)).
- Pursuant to Article 15 of the GDPR, the right of access to personal data and the right to obtain confirmation from the Controller as to whether or not personal data concerning him or her are being processed and, if so, the right to obtain access to and information about the processing of those personal data.
- Under Article 16 of the GDPR, the right to have inaccurate personal data concerning their rectified or incomplete personal data completed by the Controller without undue delay.
- The right to have personal data relating to the data subject erased by the Controller without undue delay under the conditions set out in Article 17 of the GDPR.
- The right to have the Controller restrict the processing of your personal data under the conditions set out in Article 18 of the GDPR.
- If the data subject requests so, the Controller is obliged to inform the data subject of the recipients of the personal data pursuant to Article 19 of the General Data Protection Regulation.
- Under the conditions set out in Article 20 of the GDPR, to obtain the personal data concerning them which they have provided to the Controller in a structured, commonly used and machine-readable format and the right to transmit those data to another Controller.
- To object at any time to the processing of personal data concerning them, under the conditions set out in Article 21 of the GDPR.
- Under the conditions set out in Article 22 of the GDPR, 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.
- According to Article 34(1) of the GDPR, the Controller must notify the data subject of a breach of security of their personal data which will result in a high risk to their rights and freedoms. The Controller does not have this obligation if one of the conditions set out in Article 34(3) of the GDPR applies.