

GENERAL DATA PROTECTION REGULATION – GDPR

1. INTRODUCTION

This policy focuses on the topic of personal data protection in connection with the validity of the general regulation on the protection of personal data of natural persons (General Data Protection Regulation - GDPR).

The general business principles of Neeco, s.r.o. (hereinafter referred to as the “Company”) express our obligation to endeavour to protect the personal data of our customers, suppliers and business partners. These rules define how this obligation will be implemented and explain the position of the Company as the controller of personal data.

The Company is bound by the local legislation. The main Czech regulatory authority in the area of personal data protection is the Office for Personal Data Protection (OPDP).

GDPR applies to processing of personal data in electronic, hard copy or voice form.

The Company may supplement these rules by means of individual policies and notices which comply with the General Data Protection Regulation.

2. PRINCIPLES AND RULES OF PERSONAL DATA PROTECTION

We treat the protection of your privacy when processing of personal data as an important matter and pay special attention to it. Our policy of personal data protection complies with the statutory provisions and our rules of conduct which apply to the entire Company.

We put emphasis on the cooperation with companies which observe the rules and statutory provisions and carry out their activities in accordance with the Regulation of the European Parliament and the Council (EU) on the protection of personal data. More details about the processors and recipients are given below.

Employees are bound by the duty of confidentiality and internal rules of the Company. Neeco, s.r.o. organizes and provides training to employees, focused on the rules and other obligations regarding the security and protection of data, and internal audits are carried out to check the observance of these rules and principles when working with personal data. The access to personal data is controlled and allowed based on the rights of individual employees as required for work in individual departments.

Personal data collected during visits to our website are processed by the Company in accordance with statutory provisions that are valid in the Czech Republic. To optimize the website in terms of the system performance, usability and provision of usable information about products and services, we collect and store automatically. This information typically includes the information on your IP address, browser type and language, operating system, internet service provider (ISP) and date and length of your visit.

We use these details for effective administration of the website, collection of the information regarding user behaviour on the website, analysis of trends, and collection of demographic data on our users as a whole. The information collected in this manner may be used for marketing and promotional purposes, as well as for communication (for example to facilitate the website use to the users, to make attractive special offers and services).

The Company’s website may also include links to other websites which these rules for using personal data and cookies do not apply to.

2.1 COOKIE SERVICES AND THEIR USE

The organization's website, email messages, online services, advertisements and interactive applications may use the so-called "cookies" to optimize the services.

Cookie is a small file, usually consisting of letters and numbers, which we send through our internet server to the cookie file of the browser on the hard disk of your computer. This enables us, for example, to detect a device of a particular user if the internet server connects with the internet browser. The main purpose of cookies is to enable our internet server to provide the user with the websites which the user is used to so that the visit to the website of Neeco, s.r.o. would be more personal and could respond better to the user's individual needs.

The Company uses two types of cookies on the website:

- Session cookies – temporary cookies which are saved into the cookie file of your browser till you finish working with the browser. These cookies are obligatory for proper function of some applications or functionality of the website.
- Permanent cookies – we may use permanent cookies for easy and comfortable use of the website by the users (for example fast and simple navigation). These cookies will remain in the cookie file of your browser for a longer period, depending on your internet browser settings. Permanent cookies enable transfers of information to the internet server at every visit of the website. Permanent cookies are also known as the tracking cookies.

Other personal data are only collected from the website if you give explicit consent to such processing.

3. CATEGORIES AND SCOPE OF PROCESSED DATA

With respect to the protection of personal data, we only process personal data that are adequate and relevant for a particular business purpose. These are personal data for the identification and communication with you and special categories of personal data which are required for our business activities in accordance with the applicable statutory provisions.

3.1. CATEGORIES OF PERSONAL DATA

As part of our activities, we collect personal data of employees, customers, business partners or suppliers for the purpose of person unique identification.

We collect and process the following personal data about our employees and their family members in accordance with GDPR:

- family member (if applicable – Birth Certificates of the children)
- name and surname
- telephone
- email
- photo
- address
- birth number
- date of birth
- previous employer

- employment record
- account number
- number of ID card, or passport (for foreigners)
- distraint – court decision
- confirmation of studies
- medical fitness

We collect and process the following personal data about job applicants in accordance with GDPR:

- name,
- address,
- email address,
- phone number,
- date of birth

We collect and process the following personal data about our suppliers in accordance with GDPR:

- name and surname
- company name
- address
- telephone
- email
- Comp. Reg. No./VAT No.
- Date of connection to Neeco mobile app

We collect and process the following personal data about our client in accordance with GDPR:

- name and surname
- address
- telephone
- email

3.2. SPECIAL CATEGORIES OF PERSONAL DATA

Neeco, s.r.o. does not process special categories of personal data (“sensitive data”).

3.3. PERIOD OF PROCESSING

We will work with your personal data:

- for a period required to fulfil the particular purpose (i.e. at least for the period as required by law, or till the relationship terminates in another manner)
- to determine, exercise or defend legal rights

After expiry of the determined period for processing and storage of personal data, your data will be safely deleted or destroyed, anonymized or transferred into archive.

If consent is given for marketing purposes (incl. profiling for the purpose of offering suitable products and services), the data are processed for till the purpose of processing is valid, and/or the processing period is determined by legal regulations.

3.4. DATA SOURCE

We collect the data that we process from the data subject.

We process personal data that are disclosed to us on the basis of an order.

The personal data of natural persons of our business partners and suppliers are updated during our business relationship directly by the data subject or are provided by the employer of the natural person.

If you are our employee or job applicant, the data source may be the references from former employers, or references from z internet sources, for example from the social networks, such as LinkedIn, or other job portals.

We may collect your personal data for the purpose of fulfilling an obligation under a contract (by the client).

We also process data collected lawfully from public registers or in collaboration with government authorities and institutions (in accordance with Act No. 253/2008 Coll., on selected measures against legitimisation of proceeds of crime and financing of terrorism).

Personal data may also be processed if your data were provided by a third party who you gave consent or power of attorney directly for this purpose. We may also supplement the information with data published by you from publicly available sources.

4. PURPOSES OF PERSONAL DATA PROCESSING

Neeco, s.r.o. processes personal and sensitive data only in a scope that is necessary for fulfilling the particular purpose. Sensitive data may be processed under one or several of the following circumstances:

4.1. LEGITIMATE PURPOSES OF PROCESSING

If you negotiate with Neeco, s.r.o. as a customer, business partner or supplier, personal data are processed for the following purposes:

- conclusion, administration and performance of contracts,
- management of relations, provision of contacts,
- product development,
- marketing and analysis of customers/processes,

- scientific and statistical analysis,
- performance of legal and regulatory duties.

If you are a job applicant or former or permanent employee, your personal data will be processed for the following purposes:

- performance of the employment contract, contractual obligations and human resource management,
- internal procedure, including the assessment of the organization or corporate culture,
- health and satisfaction of employees,
- detection of frauds, prevention,
- performance of legal and regulatory duties,
- protection of employees' vital interests,
- analysis of employees' profiles,
- recruitment and filling vacancies, incl. former employees and job applicants.

4.2. CONSENT

If none of the variants as per par. 4.1. applies, or if consent is required under other statutory requirement, consent will be obtained from the owner of personal data before their processing. When consent is given, we will give you the following information:

- purposes of processing which consent is required to,
- our contact details, as the controller of personal data,
- your rights in connection with processing of personal data.

With your consent, we may process the data for the following purposes:

- Marketing
- Processing of sensitive data

If the processing is reasonably necessary for satisfying a requirement, consent of the data subject is assumed (for example a website visit, use of the applications of Neeco, s.r.o., personal visit, or participation in a social event).

The data subject is entitled to refuse or withdraw consent to processing of personal data at any time.

5. RIGHTS OF DATA OWNERS

With the validity of the General Data Protection Regulation, the data owners (subjects) become entitled and have the rights to:

- information and access to personal data,
- data portability,
- restriction of processing,
- rectification and erasure of personal data,
- information regarding the rectification or erasure of personal data or restriction of processing,
- right to object,
- withdrawal from automated decision-making including profiling.

The roles in which we may record your personal data and determine the unique identification of your person are as follows:

- you are our client,
- you are our supplier – a provider of a service and technical support, processor of partial processes,
- you are our employee – a permanent or former employee, or job applicant.

If you are a different natural person whose data were collected during our activities, these data are not further processed, and we are not able to determine the unique identification of your person based on these personal data. These data are only used for the informative purposes of our Company, and are not transferred to other processors or third parties.

Furthermore, please note that if your rights in connection with the protection of personal data are exercised, our activity may be reduced with respect to you and our relationship to a certain extent.

5.1. EXERCISE OF CLIENT'S RIGHTS

With respect to the exercise of the rights of data subjects, we accept the requests at our address: Šaldova 12, Karlín, Prague 8, 186 00, or please do not hesitate to contact us at the phone number: +420 277 008 400, or at the e-mail address: GDPR@neeco.com.

A request may only be accepted if the person is uniquely identified, in written form, including email. Otherwise, we will ask you to provide sufficient data for proper identification of you.

Information and access to personal data

If we collect your personal data for processing directly from you, we have to give you the following information:

- identification and contact details of the Company,
- purpose of processing which personal data are collected for, and legal basis for processing,
- justified interests of the controller or third party if these interests come before the interests and rights of the data subject

- possible recipients of personal data and the intention to transfer your personal data to a third country or international organization,
- period for which the data will be used, or stored,
- list of your rights, including the right to make a complaint,
- whether the provision of personal data is based on a statutory or contractual requirement, i.e. which data will be processed under the law and which data will be processed based on your consent
- the fact that automated decision-making is used, including profiling

If your personal data were not collected directly from you, we also have to inform you about the category of personal data in question and the source which the data were collected from.

Portability

The owner of personal data has a right to obtain his/her personal data which were provided by him/her to us, in a structured form in a generally used and machine-readable format. As the owner of personal data, you have also a right to transfer these data to a different controller. The transfer of personal data is only possible if the personal data were collected based on consent or a contract and are processed in an automated manner.

This right may not be exercised with respect to data processed for the purpose of fulfilling a task performed in the public interest or exercise of public power which the controller is authorized to perform.

Any data transfer must not negatively affect the rights and freedoms of other persons.

Restriction of processing

As the data owner, you have a right to request that we would restrict processing of personal data if:

- you contest the accuracy of personal data processing,
- you have suspicion of unlawful processing of personal data, but refuse erasure of these personal data and ask for restriction of their use instead,
- we do not need the personal data for the processing purposes anymore, but as the data subject, you request them in order to determine, exercise or defend legal rights,
- you object to processing – the processing will be limited to a period required to check whether justified reasons of the controller prevail over justified reasons of the data subject.

Please note that if your rights in connection with the protection of personal data are exercised, our activity may be reduced with respect to you and our relationship to a certain extent.

Rectification and erasure of personal data

As the data owner, you have a right to rectification of inaccurate or outdated data relating to you.

You may rectify your personal data by sending a request to our contact details.

You may exercise the right to erasure, or the right to be forgotten, if:

- the personal data are not needed for the purpose which they were collected and processed for,
- you withdraw consent on the basis of which we process the data, and there is not any other legal reason for processing,

- personal data are processed unlawfully,
- personal data were collected under conditions of giving consent of a child in connection with services of an information company

If the right to erasure is exercised with respect to personal data which we published or transferred to third parties, we take necessary steps to contact all recipients of your personal data and to advise them to delete all references.

Your right to erasure may be exercised only after expiry of the period set to determine, exercise or defend legal rights.

Information regarding the rectification or erasure of personal data or restriction of processing

Whenever you as the data owner make a request, we will inform you about the recipients of your personal data when your personal data are disclosed to them. We will also inform you about rectifications, erasures, or when the processing of personal data relating to you is restricted.

Right to object

The right to object may only be exercised by you in certain specific cases, namely with respect to:

- processing of personal data which is required for fulfilling a task performed in the public interest or exercise of public power, and for the purposes of our justified interests or third party's interests (incl. profiling),
 - If you object and give relevant reasons, we will notify you of the reasons for processing. If our reasons do not prevail over your interests and rights, or if the reason is not to determine, exercise or defend legal rights, the processing of personal data will be finished.
- processing for the purposes of direct marketing (incl. profiling),
 - If you object and do not wish that your data would be further processed for this purpose, it is not necessary to specify the reasons for finishing processing. After receipt of your objection, we will finish using your data for this purpose. But if we also process the relevant data for other purpose on the basis of a different legal basis, the objection will not apply to such processing.
- processing for the purposes of scientific or historical research, or for statistical purposes.
 - If you object and give relevant reasons, we will notify you of the reasons for processing. The right may only be exercised if processing is not carried out to fulfil a task performed in the public interest.

Withdrawal from automated decision-making including profiling

As the owner of personal data, you have a right not to be the subject of any decision taken solely on the basis of automated processing. This right should protect you against a potentially unfavourable decision which could be taken without any human action.

We hereby confirm to you that, according to statutory definitions, automated decision-making including profiling is not carried out at our Company.

Children – exercise of the rights of minors and representation

If information services are provided to a minor child, the consent of the child to processing of his/her personal data is treated as lawful if the child reached at least the age of 13 years. Consent of a child under the age of 13 years needs to be given or approved by a legal guardian (a person with parental responsibility in relation to the child).

5.2. EXERCISE OF SUPPLIER'S RIGHTS

With respect to the exercise of the rights of supplier's data subjects, we accept the requests at our address: Šaldova 12, Karlín, Prague 8, 186 00, or please do not hesitate to contact us at the phone number: +420 277 008 400, or at the e-mail address: GDPR@neeco.com.

If our contractual relationship is based on an agreement with your employer, we perform the role of processor of your personal data in this relationship. To exercise your rights, it is necessary to contact your employer as the controller of personal data who will give you more details regarding the processing of personal data.

If you are a self-employed person who works for us on the basis of a contractual relationship, we are the controller of your personal data in this case, and you may exercise your rights with us.

Information and access to personal data

If we collect your personal data for processing directly from you, we have to give you the following information:

- identification and contact details of the Company,
- purpose of processing which personal data are collected for, and legal basis for processing,
- justified interests of the controller or third party if these interests come before the interests and rights of the data subject
- possible recipients of personal data and the intention to transfer your personal data to a third country or international organization,
- period for which the data will be used, or stored,
- list of your rights, including the right to make a complaint,
- whether the provision of personal data is based on a statutory or contractual requirement, i.e. which data will be processed under the law and which data will be processed based on your consent
- the fact that automated decision-making is used, including profiling

If your personal data were not collected directly from you, we also have to inform you about the category of personal data in question and the source which the data were collected from.

As our service provider, you have a right to information and access to the data, which will be provided to you at the time that a contract is entered into when personal data are collected. Likewise, you will be provided information after any repair, deletion or restriction of personal data processing. In any other cases, we will provide the information within one month from the relevant circumstance.

Portability

The owner of personal data has a right to obtain his/her personal data which were provided to us, in a structured form in a generally used and machine-readable format. As the owner of personal data, you have also a right to transfer these data to a different controller. The transfer of personal data is only possible if the personal data were collected based on consent or a contract and are processed in an automated manner.

This right may not be exercised with respect to data processed for the purpose of fulfilling a task performed in the public interest or exercise of public power which the controller is authorized to perform.

Any data transfer must not negatively affect the rights and freedoms of other persons.

Restriction of processing

As the data owner, you have a right to request that we would restrict processing of personal data if:

- you contest the accuracy of personal data processing,
- you have suspicion of unlawful processing of personal data, but refuse erasure of these personal data and ask for restriction of their use instead,
- we do not need the personal data for the processing purposes anymore, but as the data subject, you request them in order to determine, exercise or defend legal rights,
- you object to processing – the processing will be limited to a period required to check whether justified reasons of the controller prevail over justified reasons of the data subject.

Please note that if your rights in connection with the protection of personal data are exercised, our activity may be reduced with respect to you and our relationship to a certain extent.

Rectification and erasure of personal data

As the data owner, you have a right to rectification of inaccurate or outdated data relating to you.

You may rectify your personal data by sending a request to our contact details.

You may exercise the right to erasure, or the right to be forgotten, if:

- the personal data are not needed for the purpose which they were collected and processed for,
- you withdraw consent on the basis of which we process the data, and there is not any other legal reason for processing,
- personal data are processed unlawfully,
- personal data were collected under conditions of giving consent of a child in connection with services of an information company

If the right to erasure is exercised with respect to personal data which we published or transferred to third parties, we take necessary steps to contact all recipients of your personal data and to advise them to delete all references.

Your right to erasure may be exercised only after expiry of the period set to determine, exercise or defend legal rights.

Information regarding the rectification or erasure of personal data or restriction of processing

Whenever you as the data owner make a request, we will inform you about the recipients of your personal data when your personal data are disclosed to them. We will also inform you about rectifications, erasures, or when the processing of personal data relating to you is restricted.

Right to object

The right to object may only be exercised by you in certain specific cases, namely with respect to:

- processing of personal data which is required for fulfilling a task performed in the public interest or exercise of public power, and for the purposes of our justified interests or third party's interests (incl. profiling),
 - If you object and give relevant reasons, we will notify you of the reasons for processing. If our reasons do not prevail over your interests and rights, or if the reason is not to determine, exercise or defend legal rights, the processing of personal data will be finished.

- processing for the purposes of direct marketing (incl. profiling),
 - If you object and do not wish that your data would be further processed for this purpose, it is not necessary to specify the reasons for finishing processing. After receipt of your objection, we will finish using your data for this purpose. But if we also process the relevant data for other purpose on the basis of a different legal basis, the objection will not apply to such processing.
- processing for the purposes of scientific or historical research, or for statistical purposes.
 - If you object and give relevant reasons, we will notify you of the reasons for processing. The right may only be exercised if processing is not carried out to fulfil a task performed in the public interest.

We will expressly notify you of the right to object (except the last purpose of processing) no later than at the time of the first communication, clearly and separately from other information.

Withdrawal from automated decision-making including profiling

As the owner of personal data, you have a right not to be the subject of any decision taken solely on the basis of automated processing. This right should protect you against a potentially unfavourable decision which could be taken without any human action.

We hereby confirm to you that, according to statutory definitions, automated decision-making including profiling is not carried out at our Company.

5.3. EXERCISE OF THE RIGHTS OF EMPLOYEES OR JOB APPLICANTS

With respect to the exercise of the rights of data subjects, we accept the requests at our address: Šaldova 12, Karlín, Prague 8, 186 00, or please do not hesitate to contact us at the phone number: +420 277 008 400, or at the e-mail address: GDPR@neeco.com.

If you become our employee, we will collect data of third parties. The third parties mean family members, for example we will collect data of your children so that you could use tax allowances, or data of the contact person, etc.

Information and access to personal data

- If we collect your personal data for processing directly from you, we have to give you the following information:
- identification and contact details of the Company,
- purpose of processing which personal data are collected for, and legal basis for processing,
- justified interests of the controller or third party if these interests come before the interests and rights of the data subject
- possible recipients of personal data and the intention to transfer your personal data to a third country or international organization,
- period for which the data will be used, or stored,
- list of your rights, including the right to make a complaint,
- whether the provision of personal data is a statutory or contractual requirement,
- the fact that automated decision-making is used, including profiling.

If your personal data were not collected directly from you, we also have to inform you about the category of personal data in question and the source which the data were collected from.

As our permanent employee, you have a right to information and access to these data, which will be provided to you at the time that the Employment Contract becomes valid.

If we only keep records of you as a job applicant, your data will not be processed as structured data (you are an untraceable person by systems) after your interest in the job is not relevant anymore. Your personal data and information about you are stored on the job portals which you used to respond to our job offer only for a certain period.

Portability

The owner of personal data has a right to obtain his/her personal data which were provided by him/her to us, in a structured form in a generally used and machine-readable format. As the owner of personal data, you have also a right to transfer these data to a different controller. The transfer of personal data is only possible if the personal data were collected based on consent or a contract and are processed in an automated manner.

This right may not be exercised with respect to data processed for the purpose of fulfilling a task performed in the public interest or exercise of public power which the controller is authorized to perform.

Any data transfer must not negatively affect the rights and freedoms of other persons.

Restriction of processing

As the data owner, you have a right to request that we would restrict processing of personal data if:

- you contest the accuracy of personal data processing,
- you have suspicion of unlawful processing of personal data, but refuse erasure of these personal data and ask for restriction of their use instead,
- we do not need the personal data for the processing purposes anymore, but as the data subject, you request them in order to determine, exercise or defend legal rights,
- you object to processing – the processing will be limited to a period required to check whether justified reasons of the controller prevail over justified reasons of the data subject.

Please note that if your rights in connection with the protection of personal data are exercised, our activity may be reduced with respect to you and our relationship to a certain extent.

Rectification and erasure of personal data

As the data owner, you have a right to rectification of inaccurate or outdated data relating to you.

Job applicants and former employees may ask for the rectification of personal data by contacting DPO, using his/her contact details. As our employee, you may rectify your personal data directly in the employee system by posting additional details; the data will be updated after the human resource assistant approves them. The data may also be updated individually on the basis of an agreement with the human resource assistant.

You may exercise the right to erasure, or the right to be forgotten, if:

- the personal data are not needed for the purpose which they were collected and processed for,
- you withdraw consent on the basis of which we process the data, and there is not any other legal reason for processing,
- personal data are processed unlawfully,

- personal data were collected under conditions of giving consent of a child in connection with services of an information company

If the right to erasure is exercised with respect to personal data which we published or transferred to third parties, we take necessary steps to contact all recipients of your personal data and to advise them to delete all references.

Your right to erasure may be exercised only after expiry of the period set to determine, exercise or defend legal rights.

Information regarding the rectification or erasure of personal data or restriction of processing

Whenever you as the data owner make a request, we will inform you about the recipients of your personal data when your personal data are disclosed to them. We will also inform you about rectifications, erasures, or when the processing of personal data relating to you is restricted.

Right to object

The right to object may only be exercised by you in certain specific cases, namely with respect to:

- processing of personal data which is required for fulfilling a task performed in the public interest or exercise of public power, and for the purposes of our justified interests or third party's interests (incl. profiling),
 - If you object and give relevant reasons, we will notify you of the reasons for processing. If our reasons do not prevail over your interests and rights, or if the reason is not to determine, exercise or defend legal rights, the processing of personal data will be finished.
- processing for the purposes of direct marketing (incl. profiling),
 - If you object and do not wish that your data would be further processed for this purpose, it is not necessary to specify the reasons for finishing processing. After receipt of your objection, we will finish using your data for this purpose. But if we also process the relevant data for other purpose on the basis of a different legal basis, the objection will not apply to such processing.
- processing for the purposes of scientific or historical research, or for statistical purposes.
 - If you object and give relevant reasons, we will notify you of the reasons for processing. The right may only be exercised if processing is not carried out to fulfil a task performed in the public interest.

We will expressly notify you of the right to object (except the last item of processing) no later than at the time of the first communication, clearly and separately from other information.

Withdrawal from automated decision-making including profiling

As the owner of personal data, you have a right not to be the subject of any decision taken solely on the basis of automated processing. This right should protect you against a potentially unfavourable decision which could be taken without any human action.

We hereby confirm to you that, according to statutory definitions, automated decision-making including profiling is not carried out at our Company.

5.4. CONTACT DETAILS OF THE CONTROLLER

With respect to the exercise of the rights of data subjects, we accept the requests at our address: Šaldova 12, Karlín, Prague 8, 186 00, or please do not hesitate to contact us at the phone number: +420 277 008 400, or at the e-mail address: GDPR@neeco.com.

If you wish to make a complaint about your rights, the person competent to accept the complaint is the person responsible for protection of personal data at the Company.

We will handle your requests/complaints without undue delay, and will inform you about the result within 30 days from receipt of your request/complaint.

6. PREVAILING/SUPERORDINATE INTERESTS

Some rights and obligations of Neeco may come before the rights of individuals if justified interest exists under the given circumstances which prevails over the interest of an individual (priority interest). The prevailing interest exists if it is necessary to:

- protect justified business interests of Neeco, including:
 - health, safety, or safety of individuals,
 - intellectual property rights, business secret or the Company's reputation,
 - continuity of business operations,
- prevent or investigate violations of the law, actual or expected on the basis of justified suspicions (including cooperation with enforcement authorities), contracts, or policies of our Company,
- otherwise protect or defend the rights of Neeco, its employees or other persons.

7. TRANSFER OF PERSONAL DATA TO THIRD PARTIES

As part of our activities, your personal data may be provided to:

- entities determined by law, such as the courts, Czech National Bank, distrainers or insolvency administrators,
- other entities in order to protect rights (such as the courts, investigators, court commissioners, etc.),
- processors who ensure technical and organizational security of personal data protection,
- other contractual laboratories

Personal data are only provided to third parties in a scope required for fulfilling the business purpose.

Neeco cooperates only with processors who give sufficient guarantees for the implementation of adequate technical and organizational measures so that the processing would comply with statutory requirements and the protection of not only our clients but also our employees would be ensured.

- Ing. Lubomír Moučka – Tax Advisor
- Mgr. Josef Spolek – Lawyer
- AUDIT 99, s.r.o.
- Customs Brokers
- suppliers (partner in various countries)

8. LIST OF ENTITIES THAT MAY USE YOUR CONTACT DETAILS:

Controller:

Neeco, s.r.o. Šaldova 12, Karlín, Prague 8, 186 00, Czech Republic.

Processors:

- Business brokers entitled to broker Neeco products
- Public authorities and courts (primarily when performing our statutory obligations)
- Auditors or other independent persons ensuring the performance of statutory obligations
- Information technology providers or operators
- Providers of services required for the performance of our activities (administrative activities, archiving, legal consultancy, receivables administration, etc.)
- Providers of medical services (when insurance claims are investigated)

9. RULES FOR DATA TRANSFER OUTSIDE THE EUROPEAN UNION

This article stipulates further rules for transfers of personal data to third parties located in a country which is not expected to ensure an adequate level of protection of personal data (a restricted country).

Personal data may be transferred to a third party which is located in a restricted country if:

- Neeco has concluded a contract with the third party which guarantees that the third party will ensure a similar level of protection as implemented at our Company,
- the third party has been certified according to a Code of Conduct or certification program which is recognized according to effective legal regulations as providing “adequate” level of data protection,
- the third party has put in place binding corporate rules or similar control mechanism of personal data transfers which provides adequate guarantees according to effective legal regulations,
- the transfer is necessary for entering into or performance of a contract between Neeco and the third party, concluded in the interest of an individual,
- the transfer is necessary for performance of a contract with a customer, supplier or business partner, or upon request of a customer, supplier or business partner, before acceptance of the contract,
- the transfer is necessary to protect vital interest of an individual,
- the transfer is necessary to determine, exercise or defend legal rights,
- the transfer is necessary to satisfy a serious reason of the public interest,
- the transfer is required by any law which applies to Neeco

In the scope permitted by law, the last three items as stated above need to be approved by the company executive of Neeco in advance.

10. MONITORING AND OBSERVANCE OF LEGAL STANDARDS

To ensure the observance of the determined policies and rules, we carry out internal audits of processes and procedures including processing of personal data at our Company.

On behalf of Neeco s.r.o.

In Prague, 25th May 2018

David Pátek

Company Executive