

Personal data  
processing policy



## PERSONAL DATA PROCESSING POLICY

### INFORMATION FOR BUSINESS PARTNERS, CONTACT PERSONS

## INTRODUCTORY INFORMATION

Dear business partners and visitors,

The purpose of this Policy is to inform you of how **KABELOVNA Děčín Podmokly, s.r.o.** (hereinafter the „**Company**“) collects, processes, uses and transfers your personal information (hereinafter jointly the „**processing of personal data**“).

Personal information shall be understood as information related to specific natural entities which can be identified upon this information, or where applicable, in connection with other information.

The most common examples of personal data processed by the Company within its everyday business are the identification data (e.g., name and surname, job title) and contact details (particularly e-mail address and telephone number) of business partners (natural entities), their employees, representatives or other contact persons of business partners (hereinafter jointly „**business partners**“) as well as records on visitors to the Company premises.

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## Who is the controller of your personal data?

The controller of personal data is **KABELOVNA Děčín Podmokly, s.r.o.**, with its registered office in Děčín, Ústecká 840/33, Postcode 40533, Business Id. No: 26759993, registered in the Commercial Register at the Regional Court in Ústí nad Labem, file number C 23349.

The Company determines how and for what purpose your personal information shall be processed. You can find the contact details in the „**Questions and contacts**“ section below.

The Company and other related companies from the WILMS Group are jointly designated as the „**WILMS Group**“ in this Policy.

## What personal information is processed by the Company and for what purpose?

The table below shows what personal information is processed by the Company, for what reason and purpose.

### a) Business partners

Personal data	Purpose of processing	Legal basis for processing
<b>Identification data and contact details</b> (e.g., your name, surname, job title, company, telephone, email address).	<ul style="list-style-type: none"> <li>• conclusion and performance of the respective agreement and related business communications,</li> <li>• sending business communications to business partners,</li> <li>• addressing customers using direct marketing.</li> </ul>	<ul style="list-style-type: none"> <li>• concluding and executing an agreement,</li> <li>• legitimate interest of the Company to communicate with business partners,</li> <li>• consent of the respective person (also by handing over a business card) or granted consent to the possibility to send business communications to the person,</li> <li>• legitimate interest to address customers using direct marketing.</li> </ul>
<b>Payment and delivery data</b> (e.g., account number and delivery address).	<ul style="list-style-type: none"> <li>• Conclusion and execution of the respective agreement with business partners.</li> </ul>	<ul style="list-style-type: none"> <li>• Conclusion and execution of an agreement.</li> </ul>

## b) Visits to the Company

Personal data	Purpose of processing	Legal basis for processing
<b>identification data and contact details</b> (e.g., your name, surname, job title, company, telephone, email address).	<ul style="list-style-type: none"> <li>Record-keeping of visits to the Company premises.</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interest of the Company at the entrance check-point and protection of property.</li> </ul>
<b>Security data:</b> <ul style="list-style-type: none"> <li>records made by the CCTV system.</li> </ul>	<ul style="list-style-type: none"> <li>protection of the Company's property, employees and other persons,</li> <li>protection from theft or other criminal activities,</li> <li>checking the movement of persons on the Company premises.</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interest of the Company to check the entry of employees and other persons and to check the protection of the Company's property.</li> </ul>

## What sources does the Company obtain your personal information from?

The Company obtains personal data which are subsequently processed directly from you or resources available to the public (e.g., the Commercial Register or ARES), from your visits directly to the Company or to the WILMS Group.

## Do we share your personal information with other persons?

### a) WILMS Group companies

We share personal data within the WILMS Group only in certain circumstances, where such a procedure is in accordance with legal regulations, particularly in providing shared services between KABELOVNA Děčín Podmokly, s.r.o. and KDP Assembly, s.r.o.

Your personal information can be shared in exceptional cases with the headquarters of the WILMS Group, with its registered office in Menden, Germany, or with other WILMS Group companies within the EU, if it is necessary for the business of the WILMS Group.

### b) Service providers

The Company uses external service providers who carry out claim administration, marketing or company security. They, as processors of specific data, must be provided with the personal data of the Company's business partners and visitors (security) in order to perform their obligations.

External service providers have been checked by the Company and they provide sufficient guarantees as to confidentiality and personal data protection of business partners and visitors. All such providers have entered into written agreements on the processing of personal data with the Company, in which the providers commit to protecting personal data and complying with the Company standards to secure personal data.

### **c) Disclosure of personal data to third parties**

The Company is obliged to share the personal data of business partners or visitors with third parties beyond the above-stated service providers or by the WILMS Group companies in certain circumstances, in compliance with the personal data protection legislation.

Such third parties may include particularly the following:

- administrative and similar authorities (revenue authorities),
- financial institutions (banks, insurance companies),
- the police, prosecuting attorney offices,
- external advisers.

## **Do we transfer personal data to non-EEA countries?**

The Company does not transfer your personal information outside the European Economic Area.

## **How is your personal information secured?**

To ensure the confidentiality, integrity and availability of your personal data, the Company uses modern IT security systems. The Company maintains appropriate security technical and organizational measures against unlawful or unauthorized processing of personal data and against incidental loss or damage to the personal data. Access to personal data is only permitted to persons who need them to perform their work obligations and who are bound by a statutory or contractual obligation of confidentiality.

## **How long will we store your personal information?**

The Company will store your personal information only for the period necessary for the purpose for which they were collected, or for the protection of the legitimate interests of the Company or for the period as specified by legal regulations.

## What are your rights regarding the processing of personal data?

You can exercise all the rights stated below and specified in the legislation on personal data protection under the specified conditions, particularly the general regulation on personal data protection (GDPR):

- the right to access your personal data and to be provided with other information related to the processing of your personal data;
- the right to have incorrect or incomplete personal data corrected;
- the right to obtain your personal data and transfer them to another controller;
- the right to object to the processing of your personal data;
- the right to restrict the processing of your personal data;
- the right to delete your personal data;
- the right to withdraw the provided consent to the processing at any time;
- the right to lodge a complaint with the supervisory authority (the Office for Personal Data Protection, [www.uouu.cz](http://www.uouu.cz)).

We will reply to your request to exercise your rights within the statutory time limit, typically within 1 month of receipt of such request at the latest. Should in exceptional cases we need a longer period of time to respond to your query, we will inform you about it.

## Questions and contacts

If you are interested in detailed information on your rights related to the protection of personal data, including the right to access and correction of inaccurate data, or another query or complaint related to their processing, contact us by mail, telephone, e-mail or in person.

### **KABELOVNA Děčín Podmokly, s.r.o.**

Personnel department | Děčín, Ústecká 840/33, Postcode 40533

e-mail: [GDPR@kabelovna.cz](mailto:GDPR@kabelovna.cz) | tel.: +420 412 706 485

## Amendments to this Policy

The Company can decide to amend or update this Policy. The up-to-date Policy will always be available on the Company website [www.kabelovna.cz](http://www.kabelovna.cz), in the section entitled About us / Personal data processing policy.





**KABELOVNA Děčín Podmokly, s.r.o.**

Ústecká 840/33 | 405 33 Děčín | Czech Republic

**Phone** +420 412 706 111 | **E-mail** [gdpr@kabelovna.cz](mailto:gdpr@kabelovna.cz)

[www.kabelovna.cz](http://www.kabelovna.cz)