

## **PERSONAL DATA PROTECTION**

These principles of the personal data protection of the clients and partners of TopNest s.r.o. openly declare our will to maintain, control and enforce the requirements of standards governing personal data protection - especially the GDPR regulation, while developing values based on honesty, trust, transparency, openness, integrity and responsibility. We present the procedures below in connection with all the offered products and services. The administrator of your personal data pursuant to GDPR regulation is the company TopNest s.r.o., ID: 08196168 with its registered office at Jižní svahy 1, 621 00 Brno. If you have any questions, we will be happy to answer them. Use the e-mail [info@topnest.cz](mailto:info@topnest.cz) for your queries.

### **Customer privacy will always come first**

We realize how important it is for you how your personal data and information are used and shared. We process personal data and information to the necessary extent in accordance with the principle of data minimization.

This document defines basic information about what type of data, information and personal data we work with and what security measures we apply to safely protect them.

### **Basic information in relation to the processing of your personal data**

- a) We do not transfer your personal data to third parties. The transfer of personal data abroad is only possible with special consent.
- b) We process your personal data separately. We do not use the services of another processor for processing.
- c) We process all personal data in one place with a high degree of protection and security.
- d) In no case do we process special categories of personal data and we do not carry out extensive regular and systematic monitoring.

### **Processing of your personal data**

The information and personal data we process depends mainly on the type of service you use. Below are listed the legal reasons for processing, a description of the processing activities, a basic description of data protection and your privacy, and information about your rights.

### **Legal reasons for processing**

The processing of your personal data is a prerequisite for the following:

- a) performance of the contract - identification of the recipient of the performance, agreement on the time/place/method of performance, information necessary to change the content of the contract (Article 7 (b) of the GDPR Regulation);
- b) fulfillment of our legal obligations to the Company - we are an entity and a tax subject and for this reason we keep orders/contracts/documents/invoices that may contain your personal data (Article 7 (c) of the GDPR Regulation);
- c) fulfillment of our legitimate interests - particularly direct marketing, efforts to improve the provided services and the development of business activities (Article 7 (f) of the GDPR Regulation).

### **Activity description**

As part of our activities with you as clients and partners, we intend to cooperate commercially or we are already cooperating commercially. The following data or data of your representatives - contact persons are processed in relation to business cooperation:

- Name and surname;
- Address;
- ID, TAX ID;
- Tel. number;
- Email address:

You can also provide personal data before concluding a specific contract in the so-called pre-contractual phase, when the offer is created and accepted. You can contact us by phone by using the contact form on our website [www.topnest.cz](http://www.topnest.cz) or by email. The receipt and processing of this personal data is intended solely to facilitate communication and the conclusion of a contractual relationship.

### **Handling of personal data**

Documents containing your personal data are stored in our sales and accounting department. These documents are primarily used for accounting purposes and to fulfill our tax obligations. We also primarily use your personal data for the proper and timely fulfillment of concluded contracts (facilitation of communication, quick contact, invoicing, liability for damage, etc.) and also to fulfill our legitimate interests - continuing the business cooperation or increasing the quality and level of existing services.

The personal data filled in the contact form are automatically transferred to our internal system. The list of all customers comprises a single database, which contains only the above-mentioned contact details. Access to these databases is limited and secure.

We do not purchase any external databases and do not pass on our business databases to third parties. The processed personal data is regularly updated.

### **Information for you**

You can be informed about the scope and purpose of the processing by a clause in the contract, in an email message, orally during a telephone communication or by reference to this document.

In the event that you notify us about a change in relevant personal data, this data is immediately changed in our database and the replaced personal data is deleted.

Personal data is stored for the following periods:

- a) duration of business cooperation or expiry of the limitation period (at least 3 years)
- b) fulfillment of tax obligations - safekeeping of documents according to the VAT Act (10 years)
- c) depending on your will to further cooperate and develop with us (direct marketing, etc.)

As data subjects pursuant to GDPR Regulation, you are in particular entitled to the following: Gaining access - data subjects can at any time ask the controller to inform whether and what kind of their personal data is processed by the controller. If this is the case, data subjects have the right to access this data.

Right of rectification - if data subjects find that their personal data being processed are inaccurate or incorrect, they may request that they be supplemented or corrected.

Right of deletion - in the event that the controller has no reason given by law for processing the personal data of data subjects or another situation arises according to Article 17 of the

GDPR Regulation, they may request the controller to delete them and the latter is obliged to do so immediately.

Right to restrict processing - data subjects may request the controller to process their personal data to a limited extent if a situation arises under Article 18 of the GDPR Regulation.

The right to data portability - data subjects have the right to a structured, commonly used and machine-readable format in which all personal data will be taken. This data can then be transferred by the data subjects to another controller.

The right to object to the processing of personal data - in the event the controller is processing personal data due to its legitimate interest pursuant to Article 6, paragraph 1, (f) of the GDPR Regulations (e.g. direct marketing), data subjects have the right to object to such processing. The controller may continue processing in a given case only if it demonstrates a serious interest.

The right to complain - data subjects may file a complaint of violation by the controller to the Office for Personal Data Protection, Pplk. Sochora 27, 170 00 Prague 7, tel. 234665111, web [www.uoou.cz](http://www.uoou.cz) in case personal data is processed in violation of legal regulations.

### **Protection and security**

Our intention is to protect your personal data and the data stored by us in accordance with best practices for information protection. We are constantly improving and adopting state-of-the-art technical, physical and an administrative safeguards to help protect your collected personal information, data and information from unauthorized misuse.

Our center is protected against the entry of unauthorized entities. Continuous monitoring of physical access is provided by technical support personnel who proactively address any unauthorized intervention. Access is therefore only possible after thorough authorization.