

Personal Data Protection Principles

In its activities our company uses your personal information¹, that of our customers and business partners, real or potential, collaborators or visitors to the OSEVA premises. We do not take the protection of your personal data and privacy lightly, and we do our best to ensure that it is adequately secured. We treat personal information in full compliance with applicable laws and regulations.

In this document we will clarify what personal data we collect, for which purpose, how we use it, what we do to keep it safe, and what rights you can raise towards us. The legal framework is provided by Regulation (EU) No 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation).

Who are we? (i.e., personal data controller)

Our company OSEVA, a.s., registered office at Potoční 1436, 696 81 Bzenec, company ID no.: 47912430, registered in the Commercial Register maintained by the Regional Court in Brno, Section B, Insert 1009 is a personal data controller.²

The company OSEVA, a.s. also operates in the territory of the Slovak Republic through its organizational unit OSEVA, a.s., Slovak organizational unit, with its registered office at Štrková 1, 946 32 Marcelová, Slovak Republic, company ID No.: 50 981 137, registered in the Commercial Register of the District Court of Nitra, section Po, insert 10351/N. At the end of this document contacts to our company are included.

Which data we collect?

Without consent

1. Identification information - personal data used to identify you clearly and unambiguously, such as name, surname, title, date of birth, identity card, residence address, registered office/place of business, signature.
2. Contact details - details to contact you, such as phone number, e-mail address, contact address.
3. Purchasing data and our business cooperation, in particular the history of purchases, payment details, bank details, payment card, invoiced and paid (due) amounts, details of ongoing fulfilment and communication with you or your employees. In the context of communications, our company may also store some technical data, i.e., the time of the communication and the IP address, from which it will be sent.
4. Entrance data to our premises - guestbook and gateway records.
5. Photos.
6. Camera records.

¹ Personal information includes all information about an identified or identifiable natural person (also referred to as the “data subject”); an identifiable natural person is a natural person that can be identified directly or indirectly, in particular by reference to a particular identifier, such as name, identification number, location data, network identifier, or one or more specific elements of the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.

² Personal data controller means a subject that determines which personal data and why it will collect and how it will protect it.

7. Data collected about devices in connection with the use of web services and applications - when using our company's website www.osevabzenec.cz and www.oseva.eu we use various technologies to collect and store information to identify your browser and device (cookies and related technologies); we collect information about device (such as IP address or other unique identifiers for your device, hardware model, operating system version, mobile network information, server logs, internet protocol address, date and time of your request), location data (IP address).
8. Information on the use of your legal rights and the evidence of their use against our company.
9. Other data processed by our company is imposed by the laws and regulations of the Czech Republic, the Slovak Republic (in case of the Slovak organizational unit) or the European Union – e.g. closer identification of propagation materials (slot number, etc.).

With consent

In some cases, our company processes the above data or other data based on your consent. In such cases, the exact scope of the processed personal data is indicated in the consent you have signed. In such cases, you can always revoke this consent. With your consent, for example, we keep in our database the data about the job seekers mentioned in the submitted CVs or filled out questionnaires (including the attached photographs).

Birth ID No.

We will process your birth ID number only if you voluntarily state it on the contract or it will be required by legal regulation (unless expressly stipulated by law, our company does not require you to provide your birth ID number; it is better if you do not include it).

If you indicate the birth ID number on the basis of or in connection with the concluded contract, you are expressing - as the holder of this birth number - consent within the meaning of Section 13c (1) of the Act No. 133/2000 Coll. so that our company uses this birth ID number to record contracts, provided performance, and to protect our rights to archive, process, and use it for this purpose. The consent can be revoked, but this does not affect our right to process information and data, in cases imposed by laws and regulations or for other purposes, unless it expressly provides otherwise.

For which purpose and on the basis of which legal grounds?

This section provides an overview of the purposes, for which we will process your personal data and, at the same time, the legal grounds (s) on which we base our processing. For the processing to be legal, it must always be based on one of the grounds included in Article 6 of the Regulation. Often the data is used for multiple purposes at the same time and processed on the basis of several legal reasons for processing. If the processing purposes cease or all legal processing grounds are no longer applicable we will cease processing your personal data. We process personal data for a predetermined purpose and only to the extent necessary to fulfil this purpose. Only in exceptional cases subject to other conditions of the Regulation we may process your data for purposes other than those for which it was originally collected.

Without consent

1. For the purposes of concluding a contract and performing a contract. This agreement shows what data we need to process in order to be able to fulfil all that we have negotiated and what the law requires in connection with such a contract. This purpose and the legal reason for processing also apply to the preparation of the contract, the negotiation of the terms of the contract or the conduct of the selection procedure.
2. For the purposes of and due to the fulfilment of statutory obligations (in particular the Act on Accounting, the Tax Code, the Labour Code, the VAT Act, the File and Archiving Service Act, the Law on Consumer Protection, the laws regulating advertising).
3. For customer relationship management purposes, statistical purposes and analytical models – in order to develop our services and improve our products, we also process purchase data, requirements or complaints, compare and analyse data about our products, create statistics and predict sales, in order to protect our rights and legitimate interests. We try to anonymize data in these cases as much as possible. The legal reason for the processing is the fulfilment of the concluded contract and the legitimate interest of our company.
4. For the purposes of internal management of our company - to record and execute the concluded contracts, to control the work of our employees or other administrative procedures within the internal processes set up for our company (e.g. internal administration of our activity, reporting on the activities of our company or individual employees, an effort to optimize internal processes or the need for employee training). The legal grounds of processing constitute the legitimate interest of our company.
5. For security and risk management purposes - in cases where this is required by law or in order to protect our legitimate interests, we process your personal data to the extent necessary to ensure security in our premises, protect our property, prevent and detect fraudulent or damaging behaviour, etc.; some data (especially obtained from communication with a partner such as an IP address and communication time) will also be used for IT security purposes. The legal grounds of processing constitute the legitimate interest of our company.
6. For the purposes of exercising or defending the legal claims of our company or third parties - if we are forced to enforce our rights and claims or defend them in judicial or administrative proceedings, we will use the necessary personal data. The legitimate reason for the processing is the legitimate interest of the company.
7. Sending business messages (direct marketing) - typically sending emails or phone contacts with offers of similar products or services as you have ordered from us. We may submit bids until you have expressed the wish that we no longer send you such offers (see right to object). We will not forward your data to third parties (except for our subcontractors - processors who will conduct processing on our behalf). The legal grounds for processing constitute the legitimate interest of our company.

- ! Please note that your business communication will be sent to you within the meaning of Section 7 of the Act No. 480/2004 Coll. to your address (including e-mail), you will be contacted by unsolicited direct mail containing commercial communications about our products, business, and services. You can reject this dissemination of commercial communication at any time (see [right to object](#)). Unless you explicitly state otherwise, the refusal does not affect the sending of other types of business messages than you respond to.

With consent.

With your consent, we may process personal data for other purposes (such as marketing). In such cases, the purpose of collecting and further processing your personal information is precisely defined in your consent. In such cases, you can always withdraw this consent.

Use for other purpose than for which it was collected?

In some cases, our company may process personal data for a purpose other than the purpose, for which personal information has been collected. That is the case, especially if:

- We will collect your data for the purposes of performance of the contract and the legal regulation then prescribes how long we have to keep the data (for example, according to the Act on Accounting, we have to archive the invoices for the price for the goods or services provided for 10 years, even though we do not need the data for the purposes of performing the agreement).
- We will collect your data for the purposes of performance of the contract and consequently a dispute arises and our company must enforce its legal claims or defend its rights.
- In accordance with the provisions of Section 7 of the Act No. 480/2004 Coll. we send business communications to customers or buyers who have traded with our company in the past, and on that occasion they have given us their address – for more details see [purposes of processing](#) or [right to object](#).

From which sources does the company obtain personal data?

- Directly from you when concluding a contract or providing a service and then implementing it (in most cases).
- From publicly available registers and records, in justified cases where we apply our legitimate interests, in particular when recovering amounts due, selecting a suitable supplier, checking the existence of an entity or verifying the topical nature of the data.
- From open or publicly available sources - such as partner websites or advertisements - in the case of potential business partners in order to establish communication about possible business cooperation. Our company can store such basic data in our CRM system for further contact.
- For internal administrative purposes³ we occasionally exchange data with other subjects included in the concern.
- From other subjects, if expressly permitted by law (for example, within litigation), or if you have given your explicit consent with transferring of this information.

³ Within the AGROFERT concern, we transfer some personal data of our business partners, customers or employees, primarily for internal management and reporting purposes. However, the purpose may also be to facilitate the conclusion of contracts, the provision of performance or the resolution of certain matters.

Are you obliged to transfer personal data?

If we process the data on the basis of your consent, the transfer of your personal data is entirely voluntary.

If we process the data in connection with the contract you have entered into with us or with the service we provide to you, you can voluntarily decide whether or not to terminate the contract or to receive the service or not. If you entered into a contract or used service, you are required to provide us with the information necessary to perform the contract or use service. Without this information we cannot provide you with a service or other performance.

If the reason for collecting and further processing your personal data is to fulfil legal obligations or to protect our legitimate interests, then you are obliged to provide us with your personal information. We always ask only for the data needed to meet the defined [purpose](#).

How will the processing be conducted?

Our company will process personal data in particular in its computer systems and computerized systems of processors (such as our CRM system, within Outlook application, as far as emails are concerned, in our accounting system as far as billing data is concerned, etc.). We will process the documents in our filing cabinet.

How do we ensure the protection of your data?

Our company, in accordance with the applicable law, ensures the personal data it handles with all appropriate technical and organizational measures to ensure the highest possible level of protection, taking into account the nature, scope and purposes of processing and the probable risks. We have security and control mechanisms in place to prevent unauthorized access to or transfer of data, loss, destruction or other possible abuse.

Our employees are bound by the confidentiality duty. If we pass the data on to third parties, then these persons are also bound by a statutory or contractual confidentiality duty.

How can you decrease the risks?

Every processing of personal data carries certain risks. These may vary depending on the extent of the data processed and the way they are processed. Below we state some best practices that can help protect your data:

- If you provide us with your data, always consider whether it is necessary to provide the given data. You should be particularly careful in providing data relating to your personal life and its aspects unrelated to the purposes for which you are providing it or to the data to be published (e.g. your comments under articles, etc.). If you feel that we require too much data for you, [contact](#) us, we will check the adequacy of our request.
- If you are providing or in our services disclosing personal information of third parties (your family members or other employees of your company, etc.), consider whether this transmission is necessary and needed. If it is necessary, request the consent of such third parties.
- If one of our colleagues requests that you provide us with information, do not be afraid to ask if it is necessary and if you cannot achieve the goals of processing even without this data.
- Persons under the age of 18 are particularly vulnerable. If data transmission concerns these persons, it is necessary to consider all the circumstances very carefully. At the same time, it is necessary to consider whether consent of such persons or their legal

representatives (e.g. parents) need for the provision of such data. If you are a person under the age of 18, or possibly, if you have doubts as to whether you are able to make the right decision, discuss the matter with your parent or contact us separately.

- If you log in to our systems through a password, always use a unique strong password that you will not use for other devices and accesses. Do not tell or pass on your password even to our employees. We will never request your password, so beware of the various e-mail calls for passwords, even if signed on behalf of our company. These are likely to be fakes for the purposes of obtaining and then misusing the password.
- If you send us confidential data, try to use a secure way of communication, such as password coding the file associated with encryption and passing the password through another communication channel.
- If you feel that our company does not fulfil all obligations, there is unauthorized data leakage, or someone is pretending to be our co-worker, please, let us know as soon as possible, either electronically to our e-mail address [gdpr @ oseva.eu](mailto:gdpr@oseva.eu) or other [contact addresses](#).
- We always try to keep these instructions up to date. That is why we will make adjustments to these principles from time to time. We will inform you separately about more important modifications, but it is a good idea to read these rules again from time to time.
- Keep your data up-to-date in our services interface.

To whom do we transfer your personal data?

1. Processors - Most of the processing activities are carried out by our company (its own personnel); in some cases we use the services of third parties (hereinafter referred to as “processors”). We try to select only those specialists who are sufficiently trustworthy and secure the transferred personal data. Processors are committed by agreement to provide at least the same level of protection of the transferred personal data as our company provides. The processor is entitled to dispose of the data transmitted solely for the purpose of performing the activity, which was entrusted to us by our company. If cloud storage is used, it is located within the EU, thus, ensuring the level of protection required by applicable legislation.

The processors comprise in particular:

- Providers of IT systems, applications and cloud storage
 - Marketing agencies
 - Security service
 - Service providers in the field of occupational safety and fire protection
 - Eternal sales representatives
 - Possibly entities recovering our claims
2. Our external consultants or partners who process personal data themselves - if necessary for the provision of counselling services or if we undertake to arrange a service instead of you in order to provide you with the maximum comfort or if it is necessary to protect the rights and interests of our company (such as legal counsel, tax or economic consultant, auditors, insurance companies or insurance brokers, pension funds, banks, courts, executors, auctioneers, transport carriers, Czech postal service or Slovak postal service).

3. Our outsourced service providers who are able to access personal data processed by our company while securing the functionality of the respective services but are not entitled to dispose of personal data themselves (typically programmers or other support technical services, computer system suppliers, server services, sending mails and archival service providers, servers (backup) operators, or technology operators).
 4. We occasionally transfer some personal data of our business partners or customers to companies within the AGROFERT concern, primarily for internal management and reporting purposes. However, the purpose may also be to facilitate the conclusion of contracts, the provision of performance or the resolution of certain matters.
 5. State authorities or other entities where this is imposed upon our company by laws and regulations (for example, government authorities, supervisory authorities, seed certification bodies and certification agencies, law enforcement agencies, courts, executors, notaries, insolvency administrators).
 6. With your consent or upon your order, your personal information may also be provided to other subjects.
- ! *According to the Regulation, the principle of the free movement of persons in the EU applies; on the other hand, the Regulation restricts the transfer of personal data abroad outside of the EU. Our company does not usually transfer personal data abroad outside of the EU. However, it may happen that your personal data will be processed in a computer system whose servers will be located outside of the EU, even if we try to avoid such situations. Considering the usually business-to-business systems used, they would most likely be server-based systems located in the United States of America. In that case, we would select a company as a contracting partner that will meet the conditions agreed by the European Commission for the safe transfer of data between the EU and the US; the so-called Privacy Shield. If we transferred your personal information outside of the EU, we would inform you thereof if necessary in a suitable way.*

Membership in the concern

The company belongs to the concern AGROGERT.

Time of storing your personal data

Our company cannot process your data for any length of time, but the processing time is limited to the time we really need your data. We try to limit the length of this period so that it takes due account of both your interests and our interests. In certain cases, it is not possible to determine the exact processing time by a specific figure, or for safety reasons, it is not suitable to communicate the exact length of this time, thus below, there are, at least, some of the criteria, according to which we decide in determining the length of processing of your data.

We process your personal data for the time it takes to meet the purpose for which it was collected or for other following purpose. If the law does not impose a specific period of time during which we have to store the personal data, we consider that the purpose of the processing lasts for at least the time when raising legal claims ensuing from this processing activity is imminent and another calendar year after the all imminent legal claims cease to

exist, i.e., in case of a contract it is as a rule 11 after the termination of the contractual relationship.⁴

In determining the adequacy of the processing time of personal data, we will further ensure in particular from the following aspects (i) the length of the limitation period, (ii) the likelihood of raising legal claims, (iii) the usual procedures on the market, (iv) the likelihood and significance of the threatening risks, and (v) recommendations of the supervisory authorities.

For the purposes of sending business communications, our company will process your contact information for as long as the partner expresses disapproval with such communication. However, we will be even then entitled to process basic information about why we have sent the business communication for a reasonable period of time to establish the legitimacy of such communication.

Update of data

Since it is one of our duties as a personal data controller to process accurate data, we would like to ask you to send information about any change to your personal information, either to a person you normally communicate with on behalf of our company or to the below [contacts](#).

Right to object

If we process personal data for the legitimate interests of our company or a third party, you have the right to object to such processing in cases where this is justified by your specific situation - that is, where the processing itself is permissible but there are specific reasons why you do not want the processing to take place.

Our company will have to review the conducted processing. It will further process such personal data unless there are serious legitimate processing grounds that override your privacy protection or other interests, rights and freedoms, or if processing is not performed to establish, enforce or defend the legal claims of our company.

If we process personal data for direct marketing purposes, you may at any time object to such processing of your personal data. You can also apply this right through technical tools (opt-out of sales notes). Our company will not then process your personal data for the purposes of direct marketing, but may still be processed for other purposes.

You can object, as well as exercise your other rights, to the contacts included below. Please always state the specific situation that leads you to the conclusion that our company should not process your data.

However, the possibility of objection does not apply to all cases of processing, it is not possible to use it in the case when we process your data under a legal title other than a necessity for a legitimate purpose – e.g. due to necessity for performance of contract or fulfilment of legal obligations.

⁴ For example, when the goods are purchased after the warranty period, the limitation period commences during which the customer may raise legal claims against the company. Then we will retain our personal information for one year to ensure that no legal action has been filed against the company or other authority on the last day of the period.

What are your other rights and options?

1. *Right to information and clarification*

Our company is obliged to provide you with the information contained in this document in a concise, transparent and comprehensible manner. If any of the provisions of these policies are unclear to you or are not completely understandable to you, do not hesitate to contact us.

2. *Right to revoke consent*

In cases where we collect and process data on the basis of your consent, you have the right to revoke this consent at any time. Providing consent is entirely voluntary. If you revoke consent, it does not affect those processing activities that have already taken place at the time when the data was validly granted or the processing activities that our company is obliged to do for the previously granted consent and the processing activities already performed (due to compliance with legal obligations or the protection of our legitimate interests).

Revocation of consent is free of charge, and you can do so in any form, preferably in the same form as your consent. For example if you have granted your consent within our application, this application also offers the possibility of revoking consent. In other cases, you have the option of revoking your consent in writing or by e-mail at the below mentioned contacts. It is necessary to provide your identification data and for what purpose you refer to the original consent.

3. *Right to access personal data*

You have the right to have an overview of which data we process about you. You can request from us whether or not our company processes your personal information. In the event that we process your personal data, we will provide you with all relevant information to the extent required by Article 15 of the GDPR, including a copy of your personal data being processed.⁵

The rights of others shall not be affected by exercising the right of access to personal data.

In order to ensure that this right will not be misused by another person and to prevent the transfer of all your personal data to a stranger, we are required to verify the identity of the person who exercises the right to access.

4. *Right to rectification, or more precisely addition*

If you believe that we are processing inaccurate data about you, you have the right to notify us and request a rectification or addition.

5. *Right to erasure (i.e., the right to “be forgotten”)*

You have the right to request erasure of your personal information if at least one of the following conditions is met:

- Personal data is no longer required for the purposes for which it is collected or otherwise processed,
- Data subject revokes consent, and there is no other legal ground for processing,
- The data subject objects processing and there are no overriding legitimate grounds for processing,
- Personal data is processed unlawfully,

⁵ We will share with you the categories of personal data we process, the purposes of the processing, the categories of recipients to whom personal data may be made available, the scheduled time of processing, the source information, information about your rights, and information on whether automated decision-making is conducted.

- Personal data must be erased to comply with a legal obligation,
- Personal data was gathered in connection with the provision of information society services.

Our company, pursuant to Article 17 (3) of the GDPR, may not erase the required data if the processing is necessary:

- For establishing, enforcing or defending the legal claims of our company,
- For the exercise of the right to freedom of expression and information,
- For the fulfilment of the legal obligation imposed on our company by the Czech, Slovak or EU regulations,
- For the fulfilment of a task carried out in the public interest, if the company is entrusted with it,
- Due to public interest in the field of public health in processing for preventive or occupational medicine, etc. ⁶
- For the purposes of archiving in the public interest, for statistical purposes or for the purposes of scientific and historical research, or if the erasure would seriously jeopardize the achievement of those objectives.⁷

6. Right to data portability

The applicable legal regulation guarantees you the right to obtain from our company your personal data you have provided us in a structured, commonly used and machine-readable format. We may transfer this data to you or another controller if you so request and if technically feasible. This right can be exercised if:

- The reason for the processing comprises your consent or performance of the contract or the use of the service from our company and at the same time
- Our company conducts automated processing.

The implementation of this right must not adversely affect the rights and freedoms of others. This right cannot be exercised if we process your personal data to fulfil a public interest task if our company has been entrusted with.

7. How do we process your objections and requests?

If you contact our company with an objection or request to exercise any of your statutory rights, we will inform you of the measures taken. If we do not take any action, we will also inform you about this and explain the reasons for our action. We will provide this information within one month of receiving the request. If, due to the complexity and number of requests, this period will need to be extended, we will also let you know about it within one month of receiving the request together with the reasons for the prolongation. We will extend the deadline by two months at most. We will do our best to provide you with information on the measures taken as soon as possible.

All objections and requests and our responses are made and provided free of charge. However, our company is not obliged in certain cases set out in the Regulation to comply with the request, especially if the requests are repeated or they are manifestly unreasonable or unjustified. In such cases, we may request a reasonable fee to cover the administrative costs associated with the provision of information, or we may even reject the request.

⁶ Article 9 (2) (h) and (i) and Article 9 (3) GDPR

⁷ In accordance with Article 89 (1) of GDPR

Our company can only accept your requests or objections if it has no reasonable doubts as to the identity a person lodging the request or objection. We need to ensure that the rights are not misused by others and your personal data has not been unlawfully transferred to a stranger. For this reason, our company verifies the identity of an applicant either by requesting additional information to confirm the identity of an applicant or by submitting a request or an objection with an officially verified signature. In case of an oral application or objection at our branch, we will require proof of your identity by submitting an identity card.

8. *Right to file complaint with the supervisory authority*

If you disagree with the way we process your personal information or disagree with our company's approach, you may contact the supervisory authority at any time:

Office for the Protection of Personal Data

Pplk. Sochora 27, 170 00 Prague 7

tel.: 234 665 111

e-mail: posta@uouu.cz

web.: www.uouu.cz

and in matters concerning the Slovak organizational unit (OSEVA, a.s., Slovak organizational unit) on:

Office for the Personal Data Protection of the Slovak Republic (“Úrad na ochranu osobných údajov Slovenskej republiky”)

Hraničná 12, 820 07 Bratislava 27

Entity ID No. (IČO): 36 064 220

tel. č.: +421/2/3231 3220,

web: <https://dataprotection.gov.sk/uouu/>

Difference in Slovak legal terminology

Slovak Act No. 18/2018 Z.z. on the protection of personal data and on the amendment of certain laws uses instead of the term “controller”, the term “operator” and instead of the term “processor” the term “intermediary”.

How can you contact us?

With your inquiries, requests or objections, you can contact our company in the following ways:

Via post:

OSEVA, a.s., Potoční 1436, 696 81 Bzenec, Czech Republic

In the matter concerning the organizational unit in Slovakia: OSEVA, a.s., Slovak organizational unit, Štrková 1, 946 32 Marcelová, Slovak Republic

Via e-mail: gdpr@oseva.eu

Conclusion

This document will be continuously updated and supplemented.