

SM 23/1_V1 S10 Page 1(20)

PRIVACY POLICY

	Name	Signature	Date
Document owner	Lukas Hrabeta		14/07/2023
He approved	Milan Prucha		20/07/2023
Efficiency			01/08/2023
Discarded			



SM 23/1_V1 S10 Page 2(20)

Content

1		Gene	eral	. 3
	1.1	1 D	ocument validity	. 3
1.		Introd	duction	. 4
2.		Priva	cy policy and rules	. 5
	2.	1.	Cookie services and their use	. 5
3.		Cate	gory and scope of processed data	. 6
	3.1	1.	Categories of personal data	. 6
	3.2	2.	Special categories of personal data	. 6
	3.3	3.	Processing time	. 6
	3.4	4.	Data source	. 7
4.		Purpo	oses of personal data processing	. 8
	4.1	1.	Legitimate processing purposes	. 8
	4.2	2.	Agreement	. 8
5.		Right	s of data owners	. 9
	5.	1.	Exercising client rights	. 9
	5.	1.1.	Children - exercise of the rights of minors and representation	11
	5.2	2.	Exercising supplier's rights	11
	5.3	3.	Exercising the rights of employees or job applicants	13
	5.4	4.	Administrator contact details	15
6.		Overi	riding/overriding interests	16
7.		Trans	sfer of personal data to third parties	17
8.		List o	f entities that may come into contact with your contact data:	18
9.		Rules	s for the transfer of data outside the European Union	19
10).	Monit	toring and compliance with legal standards	20



	SM 23/1_V1
ĺ	S10
ĺ	Page 3(20)

1 GENERAL

The aim of the procedure is to define the rules for determining the rules for the protection of personal data.

1.1 Document validity

The document is valid for all interested employees of TRIXIT, s.r.o



SM 23/1_V1
S10
Page 4(20)

1. Introduction

This directive is dedicated to the topic of personal data protection following the validity of the general regulation on the protection of personal data of natural persons, or GDPR (General Data Protection Regulation).

The general business principles of TRIXIT, s.r.o. (hereinafter referred to as the company) express our commitment to strive to protect the personal data of our customers, suppliers and business partners. These rules state how this commitment will be implemented and the company's position as a controller of personal data.

The company is bound by local legislation. In the field of personal data protection, the main Czech regulator is the Office for Personal Data Protection ($\acute{U}OO\acute{U}$).

The GDPR regulation on the protection of personal data applies to processing in electronic form, paper form, voice form.

The Company may supplement these rules through sub-policies and notices that are in accordance with the regulation and rules on personal data protection.



SM 23/1_V1
S10
Page 5(20)

2. PRIVACY POLICY AND RULES

We consider the protection of your privacy when processing personal data to be an important matter and pay special attention to it. Our privacy policy complies with legal provisions and with our company-wide code of conduct.

We emphasize cooperation with companies that comply with the rules and legal provisions and conduct their activities in accordance with the regulation of the European Parliament and the Council (EU) on the protection of personal data. More about processors and recipients below.

Employees are bound by confidentiality and internal company rules. TRIXIT, s.r.o. organizes and provides training to employees on the rules and other obligations related to data security and protection, as well as internal audits aimed at checking compliance with these rules and principles when working with personal data. Access to personal data is controlled and based on the rights of individual employees as is absolutely necessary for work in individual departments.

We process personal data obtained during visits to our website in accordance with the legal provisions in force in the Czech Republic. We automatically collect and store information about products and services to optimize this website for system performance, usability and to provide useful information about products and services. This information is typically information about your IP address, browser type and language settings, operating system, Internet Service Provider (ISP), and the date and duration of your visit.

We use this information to effectively administer the Website, to obtain information about the behavior of users on the Website, to analyze trends and to gather demographic data about our users as a whole. The information collected in this way can be used for marketing and promotional purposes as well as for communication (e.g. for easier orientation of users on the website, provision of attractive special offers and services.

The Company's website may include links to other websites that are not covered by this privacy and cookie policy.

2.1. Cookie services and their use

The organization's website, e-mail messages, online services, advertisements and interactive applications may use so-called "cookies" in order to optimize services.

"cookie" is a small file, usually consisting of letters and numbers, that we send through our Internet server to the browser's cookie file on your computer's hard drive. This, for example, allows us to recognize the user's device in the event that a connection is made between the Internet server and The main purpose of cookies is to enable our internet server to provide the user with the website he is used to so that the visit to the TRIXIT, s.r.o. website is more personal for the user and can better respond to his individual needs.

The company uses two types of cookies on its website:

- Session cookies these are temporary cookies that are stored in your browser's cookie file until you close
 your browser. These cookies are mandatory for the proper functioning of some applications or the
 functionality of these pages.
- Permanent cookies we can use permanent cookies for easier and more convenient user orientation on the website (e.g. faster and simpler navigation). These cookies remain in your browser's cookie file for a longer period of time, which depends on the Internet browser settings you choose. Permanent cookies enable the transfer of information to the Internet server each time the website is visited. Permanent cookies are also known as tracking cookies.

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



SM 23/	I_V1	
S10		
Page 6(20)	

3. CATEGORY AND SCOPE OF PROCESSED DATA

With regard to the protection of personal data, we limit the processing of personal data to data that is reasonable and relevant for the relevant business purpose. These are personal data for identification and communication with you and special categories of personal data that are necessary for our business activities in accordance with the relevant legal 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 unique identification of a person.

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

- family member (if applicable children's birth certificates)
- name and surname
- phone
- e-mail
- photo
- address
- personal identification number
- birthdate
- previous employer
- credit sheet
- account number
- OP number for foreigners, passport
- execution court decision
- certificate of study
- medical fitness

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

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

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

- name and surname
- Company name
- address
- phone
- e-mail
- IČO/TIN

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

- name and surname
- address
- phone
- e-mail
- IČO/TIN

3.2. Special categories of personal data

TRIXIT, s.r.o. does not process special categories of personal data ("sensitive personal data").

3.3. Processing time

We work with your personal data:



SM 23/1_V1
S10
Page 7(20)

- for the time required to fulfill the relevant purpose (i.e. at least for the duration of the requirements of the law, or termination of the relationship in another form)
- · for the determination, exercise or defense of legal claims

After the end of the specified period for the processing and storage of personal data, your data will be securely deleted or destroyed, anonymized or transferred to an archive.

In the case of granting consent for marketing purposes (including profiling for the purpose of offering suitable products and services), the data is processed for the period of validity of the processing purpose or the processing period is determined by legal regulations.

3.4. Data source

We obtain the data we process from the subject of personal data.

We process personal data that is communicated to us on the basis of an order.

The personal data of natural persons of our business partners and suppliers is updated directly by the subject of personal data during our business relationship or is communicated by the natural person's employer.

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

We may obtain your personal data for the purpose of fulfilling an obligation from the contract (by the client).

We also process personal data legally obtained from public registers or in cooperation with government bodies and institutions (in the sense of Act No. 253/2008 Coll. on certain measures against the legalization of proceeds from criminal activities and the financing of terrorism).

Personal data may be processed even if your data is provided by a third party to whom you have given consent or direct power of attorney for this purpose. We can supplement the information with data published by you from publicly available sources.



SM 23/1_V1
S10
Page 8(20)

4. Purposes of Personal Data Processing

TRIXIT, s.r.o. processes personal and sensitive data only to the extent necessary to fulfill the relevant purpose. Sensitive data may be processed in one or more of the following circumstances:

4.1. Legitimate processing purposes

If you deal with TRIXIT, s.r.o. as a customer, business partner or supplier, personal data is processed for the following purposes:

- concluding, managing and fulfilling contracts,
- · managing relationships, providing contacts,
- · product development,
- · marketing and customer/process analysis,
- · scientific and statistical analysis,
- fulfillment of legal and regulatory obligations.

If you are a job seeker or a former or permanent employee, your personal data is processed for the following purposes:

- fulfillment of the employment contract, contractual obligations and human resources management,
- internal management including evaluation of the organization or corporate culture,
- · employee health and satisfaction,
- fraud detection, prevention,
- · fulfillment of legal and regulatory obligations,
- protection of the vital interests of employees,
- · analysis of employee profiles,
- · admission and filling of vacancies, incl. former employees and job seekers.

4.2. Agreement

If it is not one of the variants according to paragraph 4.1. or consent is required by another legal requirement, consent will be obtained from the owner of the personal data prior to its processing. When granting consent, we will provide you with the following information:

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

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

- Marketing
- · Processing of sensitive data

If the processing is reasonably necessary to fulfill the request, the consent of the data subject is assumed (for example, visiting a website, using applications of TRIXIT, s.r.o., personal visit or participation in a social event).

The data subject has the right to refuse or withdraw consent to the processing of personal data at any time.



SM 23/1_V1
S10
Page 9(20)

5. RIGHTS OF DATA OWNERS

With the entry into force of the General Regulation on the Protection of Personal Data, the owners (entities) of personal data have the right to:

- · information and access to personal data,
- data portability,
- · restriction of processing,
- · correction and deletion of personal data,
- · information regarding correction or deletion of personal data or restriction of processing,
- raise an objection
- exemption from automated decision-making, including profiling.

The roles in which we can record your personal data and determine your unique identification are:

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

If you are another natural person whose data was obtained during our activity, this data is not further processed and we are not able to determine a clear identification of your person based on this personal data. These data are used only for the informational purposes of our company and are not forwarded to other processors or third parties.

Furthermore, we would like to inform you that when exercising your rights in connection with the protection of personal data, there may be a certain limitation of our activities towards you and our contractual relationship.

5.1. Exercising client rights

We accept requests for exercising the rights of personal data subjects at our address Rybná 716/24 Staré Město Prague .

The request can be accepted in case of clear identification of the person, in written form.

Information and access to personal data

In the event that we receive your personal data for processing directly from you, we are obliged to inform you of the following:

- the identity and contact details of the company,
- the processing purposes for which the personal data is obtained and the legal basis for the processing,
- the legitimate interests of the administrator or a third party in the event that these interests are superior to the interests and rights of the data subject
- potential recipients of personal data and intentions to transfer your personal data to a third country or international organization,
- the period for which the data will be used, or saved
- a list of your rights, including the right to file a complaint,
- whether the provision of personal data is a legal or contractual requirement, i.e. when data is processed
 on the basis of the law and when on the basis of your consent
- the fact that automated decision-making takes place, including profiling

In the event that your personal data were not obtained directly from you, we are also obliged to provide you with information about the category of personal data in question and the source from which the data was received.

Portability

The owner of personal data has the right to receive his personal data that he has provided to us in a structured form in a commonly used and machine-readable format. At the same time, you, as the owner of personal data, have the right to transfer this data to another administrator. The transfer of personal data is only possible for personal data that is obtained on the basis of consent or contract and is processed automatically.



SM 23/1_V1
S10
Page 10(20)

This right cannot be applied to processed data for the fulfillment of a task carried out in the public interest or in the exercise of public authority with which the administrator is entrusted.

The rights and freedoms of other persons must not be adversely affected during the transfer of data.

Restriction of processing

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

- deny the accuracy of personal data,
- you suspect the unlawful processing of personal data, but you refuse to delete this personal data and instead request the restriction of its use,
- we no longer need the personal data for processing purposes, but you, as the data subject, require them for the determination, exercise or defense of legal claims,
- you object to the processing the processing will be limited to the time needed to verify whether the legitimate reasons of the administrator prevail over the legitimate reasons of the data subject.

We would like to inform you that in the event of a request to restrict the processing of your personal data, our activity towards you and our contractual relationship may be restricted.

Correction and deletion of personal data

As a data subject, you have the right to correct inaccurate or out-of-date personal data concerning you. You can correct your personal data by sending a request to our contact details.

You can exercise the right to erasure or the right to be forgotten if:

- personal data are no longer needed for the purpose for which they were collected and processed,
- you revoke the consent on the basis of which we process the data and there is no other legal reason for the processing,
- personal data is processed unlawfully,
- personal data were collected under the terms of the child's consent in connection with information society services

In the event that the right to erasure of personal data that has been published by us or passed on to third parties is exercised, we take the necessary steps to contact all recipients of your personal data and communications to delete all references.

Your right to erasure can only be exercised after the expiry of the set period for the determination, exercise or defense of legal claims.

Information regarding correction or deletion of personal data or restriction of processing

Whenever you as the owner of the data require it, we will inform you about the recipients of your personal data at the moment when your data was made available to them. We will also inform you about corrections, deletions, or if the processing of personal data concerning you is restricted.

The right to object

You only have the right to object in certain specific cases, namely:

- processing of personal data that is necessary to fulfill a task carried out in the public interest or in the
 exercise of public authority or for the purposes of our legitimate interests or the interests of a third party
 (including profiling),
 - o In the event that you raise an objection with relevant reasons, we will inform you of the reasons for the processing. If our reasons do not prevail over your interests and rights, or if it is not a reason for the determination, exercise or defense of legal claims, the processing of personal data will be interrupted.
- processing for direct marketing purposes (including profiling),
 - o In the event that you raise an objection and do not wish your data to be further processed for this purpose, there is no need to provide reasons for termination. After receiving the objection, we stop using your data for this purpose. However, if we also process the relevant data for another purpose on the basis of another legal basis, such processing is not affected by the objection.
- processing for the purposes of scientific or historical research or for statistical purposes.



SM 23/1_V1	_
S10	
Page 11(20)	

In the event that you raise an objection with relevant reasons, we will inform you of the reasons for the
processing. The right can only be exercised if it is not processing for the fulfillment of a task carried
out in the public interest.

Exemption from automated decision-making, including profiling

As the owner of personal data, you have the right not to be subject to any decision based solely on automated processing. This is to protect against a potentially adverse decision that could be made without human intervention.

We hereby confirm that, according to legal definitions, automated decision-making, including profiling, does not occur in our company.

5.1.1. Children - exercise of the rights of minors and representation

In the case of providing information services to a minor, the child's consent to the processing of his personal data is considered lawful if the child has reached the age of at least 13. The consent of a child under the age of 13 must be expressed or approved by a legal representative (person with parental responsibility for the child).

5.2. Exercising supplier's rights

For exercising the rights of personal data subjects, we accept requests at our address Rybná 716/24 Staré Město Prague

The request can be accepted in case of clear identification of the person, in written form.

If our contractual relationship is based on an agreement with your employer, we act as a processor of your personal data in this relationship. In order to exercise your rights, it is necessary to contact your employer as the administrator of personal data, who will provide us with any further information about the processing of personal data.

If you are a self-employed person with whom we cooperate on the basis of a contractual relationship, in this case we are the administrator of your personal data and you can exercise your rights with us.

Information and access to personal data

In the event that we receive your personal data for processing directly from you, we are obliged to inform you of the following:

- the identity and contact details of the company,
- the processing purposes for which the personal data is obtained and the legal basis for the processing,
- the legitimate interests of the administrator or a third party in the event that these interests are superior to the interests and rights of the data subject
- potential recipients of personal data and intentions to transfer your personal data to a third country or international organization,
- the period for which the data will be used, or saved
- a list of your rights, including the right to file a complaint,
- whether the provision of personal data is a legal or contractual requirement, i.e. when data is processed
 on the basis of the law and when on the basis of your consent
- the fact that automated decision-making takes place, including profiling

In the event that your personal data were not obtained directly from you, we are also obliged to provide you with information about the category of personal data in question and the source from which the data was received.

As our service provider, you have the right to information and access to data that will be provided to you at the time of signing the contract for the collection of personal data. In the same way, you will be provided with information after correction, deletion or restriction of processing of personal data. In all and other cases, we will provide you with information no later than one month after the fact occurred.



SM 23/1_V1
S10
Page 12(20)

Portability

The owner of personal data has the right to receive his personal data that he has provided to us in a structured form in a commonly used and machine-readable format. At the same time, you, as the owner of personal data, have the right to transfer this data to another administrator. The transfer of personal data is only possible for personal data that is obtained on the basis of consent or contract and is processed automatically.

This right cannot be applied to processed data for the fulfillment of a task carried out in the public interest or in the exercise of public authority with which the administrator is entrusted.

The rights and freedoms of other persons must not be adversely affected during the transfer of data.

Restriction of processing

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

- deny the accuracy of personal data,
- you suspect the unlawful processing of personal data, but you refuse to delete this personal data and instead request the restriction of its use,
- we no longer need the personal data for processing purposes, but you, as the data subject, require them for the determination, exercise or defense of legal claims,
- you object to the processing the processing will be limited to the time needed to verify whether the legitimate reasons of the administrator prevail over the legitimate reasons of the data subject.

We would like to inform you that in the event of a request to restrict the processing of your personal data, our activity towards you and our contractual relationship may be restricted.

Correction and deletion of personal data

As a data subject, you have the right to correct inaccurate or out-of-date personal data concerning you.

You can correct your personal data by sending a request to our contact details.

You can exercise the right to erasure or the right to be forgotten if:

- · personal data are no longer needed for the purpose for which they were collected and processed,
- you revoke the consent on the basis of which we process the data and there is no other legal reason for the processing,
- · personal data is processed unlawfully,
- personal data were collected under the terms of the child's consent in connection with information society services

In the event that the right to erasure of personal data that has been published by us or passed on to third parties is exercised, we take the necessary steps to contact all recipients of your personal data and communications to delete all references.

Your right to erasure can only be exercised after the expiry of the set period for the determination, exercise or defense of legal claims.

Information regarding correction or deletion of personal data or restriction of processing

Whenever you as the owner of the data require it, we will inform you about the recipients of your personal data at the moment when your data was made available to them. We will also inform you about corrections, deletions, or if the processing of personal data concerning you is restricted.

The right to object

You have the right to object only in certain specific cases, namely :

processing of personal data that is necessary to fulfill a task carried out in the public interest or in the
exercise of public authority or for the purposes of our legitimate interests or the interests of a third party
(including profiling),



SM 23/1_V1
S10
Page 13(20)

- o In the event that you raise an objection with relevant reasons, we will inform you of the reasons for the processing. If our reasons do not prevail over your interests and rights, or if it is not a reason for the determination, exercise or defense of legal claims, the processing of personal data will be interrupted.
- · processing for direct marketing purposes (including profiling),
 - o In the event that you raise an objection and do not wish your data to be further processed for this purpose, there is no need to provide reasons for termination. After receiving the objection, we stop using your data for this purpose. However, if we also process the relevant data for another purpose on the basis of another legal basis, such processing is not affected by the objection.
- processing for the purposes of scientific or historical research or for statistical purposes.
 - In the event that you raise an objection with relevant reasons, we will inform you of the reasons for the
 processing. The right can only be exercised if it is not processing for the fulfillment of a task carried
 out in the public interest.

We will explicitly notify you of the right to object (except for the last purpose of processing) at the time of the first communication at the latest, clearly and separately from other information.

Exemption from automated decision-making, including profiling

As the owner of personal data, you have the right not to be subject to any decision based solely on automated processing. This is to protect against a potentially adverse decision that could be made without human intervention.

We hereby confirm that, according to legal definitions, automated decision-making, including profiling, does not occur in our company.

5.3. Exercising the rights of employees or job applicants

We accept requests for exercising the rights of personal data subjects at our address Rybná 716/24 Staré Město Prague .

The request can be accepted in case of clear identification of the person, in written form.

If you become our employee, third party data is collected. The third person refers to family members, for example your children's data for claiming tax credits, contact person data and others.

Information and access to personal data

In the event that we receive your personal data for processing directly from you, we are obliged to inform you of the following:

- the identity and contact details of the company,
- the processing purposes for which the personal data is obtained and the legal basis for the processing,
- the legitimate interests of the administrator or a third party, if these interests are superior to the interests and rights of the data subject,
- potential recipients of personal data and intentions to transfer your personal data to a third country or international organization,
- the period for which the data will be used, or saved
- a list of your rights, including the right to file a complaint,
- whether the provision of personal data is a legal or contractual requirement,
- the fact that automated decision-making takes place, including profiling.

In the event that your personal data were not obtained directly from you, we are also obliged to provide you with information about the category of personal data in question and the source from which the data was received.

As our permanent employee, you have the right to information and access to this data, which will be provided to you at the time of validity of the employment contract.

If we only register you as a job seeker, your data will not be further processed as structured data after the expiry of your interest in employment (you are a systemically untraceable person). Your personal data and



SM 23/1	_V1
S10	
Page 14(20)

information about you are stored on job portals through which you responded to our job offer only for a certain period of time.

Portability

The owner of personal data has the right to receive his personal data that he has provided to us in a structured form in a commonly used and machine-readable format. At the same time, you, as the owner of personal data, have the right to transfer this data to another administrator. The transfer of personal data is only possible for personal data that is obtained on the basis of consent or contract and is processed automatically.

This right cannot be applied to processed data for the fulfillment of a task carried out in the public interest or in the exercise of public authority with which the administrator is entrusted.

The rights and freedoms of other persons must not be adversely affected during the transfer of data.

Restriction of processing

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

- deny the accuracy of personal data,
- you suspect the unlawful processing of personal data, but you refuse to delete this personal data and instead request the restriction of its use,
- we no longer need the personal data for processing purposes, but you, as the data subject, require them for the determination, exercise or defense of legal claims,
- you object to the processing the processing will be limited to the time needed to verify whether the legitimate reasons of the administrator prevail over the legitimate reasons of the data subject.

We would like to inform you that in the event of a request to restrict the processing of your personal data, our activity towards you and our contractual relationship may be restricted.

Correction and deletion of personal data

As a data subject, you have the right to correct inaccurate or out-of-date personal data concerning you.

Job seekers and former employees can request correction of personal data by contacting the DPO at his contact details. As our employee, you have the opportunity to correct your personal data directly in the employee system with the attachment of additional documents, when the data will be updated after approval by the HR assistant. The data can also be updated in accordance with the agreement with the personal assistant in an individual way.

You can exercise the right to erasure or the right to be forgotten if:

- personal data are no longer needed for the purpose for which they were collected and processed,
- you revoke the consent on the basis of which we process the data and there is no other legal reason for the processing,
- personal data is processed unlawfully,
- personal data were collected under the terms of the child's consent in connection with information society services

In the event that the right to erasure of personal data that has been published by us or passed on to third parties is exercised, we take the necessary steps to contact all recipients of your personal data and communications to delete all references.

Your right to erasure can only be exercised after the expiry of the set period for the determination, exercise or defense of legal claims.

Information regarding correction or deletion of personal data or restriction of processing

Whenever you as the owner of the data require it, we will inform you about the recipients of your personal data at the moment when your data was made available to them. We will also inform you about corrections, deletions, or if the processing of personal data concerning you is restricted.



SM 23/1	_V1
S10	
Page 15(20)

You have the right to object only in certain specific cases, namely :

- processing of personal data that is necessary to fulfill a task carried out in the public interest or in the
 exercise of public authority or for the purposes of our legitimate interests or the interests of a third party
 (including profiling),
 - o In the event that you raise an objection with relevant reasons, we will inform you of the reasons for the processing. If our reasons do not prevail over your interests and rights, or if it is not a reason for the determination, exercise or defense of legal claims, the processing of personal data will be interrupted.
- processing for direct marketing purposes (including profiling),
 - o In the event that you raise an objection and do not wish your data to be further processed for this purpose, there is no need to provide reasons for termination. After receiving the objection, we stop using your data for this purpose. However, if we also process the relevant data for another purpose on the basis of another legal basis, such processing is not affected by the objection.
- processing for the purposes of scientific or historical research or for statistical purposes.
 - o In the event that you raise an objection with relevant reasons, we will inform you of the reasons for the processing. The right can only be exercised if it is not processing for the fulfillment of a task carried out in the public interest.

We will explicitly inform you of the right to object (except for the last point of processing) at the latest at the time of the first communication, clearly and separately from other information.

Exemption from automated decision-making, including profiling

As the owner of personal data, you have the right not to be subject to any decision based solely on automated processing. This is to protect against a potentially adverse decision that could be made without human intervention.

We hereby confirm that, according to legal definitions, automated decision-making, including profiling, does not occur in our company.

5.4. Administrator contact details

We accept requests for exercising the rights of personal data subjects at our address Rybná 716/24 Staré Město Prague .

In the event that you wish to send a complaint with regard to your rights, the competent person designated for the protection of personal data in the company is responsible for receiving this complaint.

We will process your requests/complaints without undue delay and will inform you of the processing within 30 days of receiving the request/complaint.

Identification data	
Exact company name	TRIXIT, s.r.o
Residence	Rybná 716/24 Old Town Prague
ID number	08510938
Business phone	+420 777322475
Company email	hello@trixit.cz
www presentation	Trixit.cz



٦	SM 23/1_V1
	S10
	Page 16(20)

6. Overriding/overriding interests

Certain rights and obligations of TRIXIT, s.r.o. may be superior to the rights of individuals if, under the given specific circumstances, there is a legitimate interest that prevails over the interest of the individual (priority interest). An overriding interest exists if:

- to protect the legitimate business interests of TRIXIT, s.r.o., including:
 - o the health, safety or security of individuals;
 - o intellectual property rights, trade secrets or company name,
 - o continuity of business operations,
- prevent or investigate violations of the law, whether actual or suspected based on reasonable suspicion (including cooperation with law enforcement authorities), contracts, or our company policies;
- otherwise protect or defend the rights of TRIXIT, s.r.o., its employees or other persons.



SM 23/1_V1
S10
Page 17(20)

7. Transfer of Personal Data to third parties

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

- to entities provided by law, e.g. courts, the Czech National Bank, executors or insolvency administrators,
- to other entities for the protection of rights (e.g. courts, investigators, judicial commissioners, etc.),
- processors who guarantee technical and organizational security of personal data protection,
- other contracted laboratories

Personal data are transferred to third parties only to the extent necessary for the fulfillment of the business purpose.

The TRIXIT, s.r.o. company only cooperates with processors who provide sufficient guarantees for the introduction of appropriate technical and organizational measures so that the processing meets legal requirements and ensures the protection of the rights of not only our clients but also employees.



SM 23/1	_V1
S10	
Page 18(20)

8. LIST OF ENTITIES THAT MAY COME INTO CONTACT WITH YOUR CONTACT DATA:

Administrator:

Identification data	
Exact company name	TRIXIT, s.r.o
Residence	Rybná 716/24 Old Town Prague
ID number	08510938
Business phone	+420 777322475
Company email	hello@trixit.cz
www presentation	Trixit.cz

Processors:

- Business intermediaries authorized to mediate TRIXIT, s.r.o. products
- Public authorities and courts (especially when fulfilling our legal obligations)
- · Auditors or other independent persons ensuring the fulfillment of legal obligations
- Providers or operators of information technology
- Providers of services necessary for the performance of our activities (administrative activities, archiving, legal advice, receivables management, etc.)
- Health service providers (when investigating insurance claims)



SM 23/1_V1
S10
Page 19(20)

9. Rules for the transfer of data outside the European Union

This article sets out additional rules for the transfer of personal data to third parties located in a country that is not expected to provide an adequate level of personal data protection (a country with inappropriate status).

Personal data may be transferred to a third party located in a country with inappropriate status only if:

- a contract has been concluded between the company TRIXIT, s.r.o. and the relevant third party, which
 provides guarantees that the third party will comply with a similar level of protection as established in our
 company,
- the third party has been certified under a code of conduct or certification program recognized under applicable law as providing an "adequate" level of data protection,
- the third party has implemented binding corporate rules or a similar mechanism to control the transfer of personal data that provides appropriate safeguards under applicable law;
- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of an individual between Trixit s.r.o. and a third party,
- the transfer is necessary for the fulfillment of the contract with the customer, supplier or business partner, or at the request of the customer, supplier or business partner before accepting the contract,
- · the transfer is necessary to protect a vital interest of the individual,
- the transfer is necessary for the determination, exercise or defense of legal claims,
- · the transfer is necessary to satisfy a serious public interest reason,
- the transfer is required by any law to which TRIXIT, s.r.o. is subject

To the extent permitted by law, the last three points mentioned above require the prior approval of the executive of TRIXIT, s.r.o



SM 23/1_V1
S10
Page 20(20)

10. MONITORING AND COMPLIANCE WITH LEGAL STANDARDS

In our company, internal audits of the processes and procedures that include the processing of personal data are carried out in order to comply with the established principles and rules.

For TRIXIT, s.r.o. In Prague: 1 August 2023

Managing Director