

## DATA PRIVACY STATEMENT

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### NDC Group Czech s.r.o.

a company incorporated under the laws of the Czech Republic, registered office at Hvězdova 1716/2b, 140 78 Praha 4, Czech Republic, ID: 05432898, registered in the commercial register maintained by the Municipal Court in Prague, file C 263573

(hereinafter referred to as "Controller")

issues herewith following

### **Declaration on the Processing of Personal Data When Providing Licenses To Use Software**

This declaration is made in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter referred to as „GDPR“) and in accordance with Act No. 110/2019 Coll., on the processing of personal data, as amended.

The Controller is an IT company and a personal data controller. The subject of business is mainly the provision of software, IT consultancy, data processing, hosting and related activities and web portals, advisory and consulting activities, preparation of expert studies and reports, testing, measurement, analysis and control, advertising, marketing, media representation and provision of technical services.

The Controller declares that it processes personal data in the context of the following conditions:

The Controller processes personal data of natural persons in the context of providing software and licenses for its use and cooperation with the Controller's contractual partners (both suppliers and customers).

Personal data are processed to the extent that the respective data subject has provided them to the Controller, in connection with the conclusion of a contractual relationship with the Controller.

Categories of personal data subject to processing:

Address and identification data serving to uniquely and unmistakably identify the data subject and data enabling contact with the data subject, other data necessary for the performance of the contract or obligations arising from legal regulations.

For customers and contractual partners: name and surname, ID number or date of birth, academic and other titles, registered office or residence, telephone, e-mail, billing data (amount, subject of taxable transaction, account number, VAT number, etc.), job title.

In the above-mentioned activities of the Controller, no special categories of data (e.g. racial or ethnic origin, political opinions, religious beliefs) are processed.

The Controller processes data in cases where the processing of personal data does not require the consent of the data subject.

In accordance with Article 6(1) of the GDPR, the Controller may process the following data without the data subject's consent:

The processing is necessary for the performance of a contract (work contract, purchase contract, licence agreement) to which the data subject is a party or for the implementation of measures taken prior to the conclusion of the contract at the request of the data subject. The processing is necessary for

compliance with a legal obligation to which the Controller is subject (obligations of an IT service provider). The processing is necessary to protect the vital interests of the data subject or another natural person. The processing is necessary for the purposes of the legitimate interests of the Controller or a third party, except where those interests are overridden by the interests or fundamental rights and freedoms of the data subject requiring the protection of personal data.

Processing is carried out at the Controller's registered office by individual authorised employees of the Controller or by the processor. The processing is carried out by means of computer technology, or manually for personal data in paper form, in compliance with all security principles for the management and processing of personal data. To this end, the Controller has adopted technical and organisational measures to ensure the protection of personal data, in particular measures to prevent unauthorised or accidental access to, alteration, destruction or loss of personal data, unauthorised transmission, unauthorised processing or other misuse of personal data. All entities to which personal data may be disclosed shall respect the right to privacy of the data subjects and shall comply with the applicable data protection legislation and the confidentiality obligation to which they have committed themselves.

In accordance with the time limits specified in the relevant contracts or in the relevant legislation, this is the time necessary to ensure the rights and obligations arising from both the contractual relationship and the relevant legislation and to protect the rights and legitimate interests of the data subjects, the Controller and third parties (e.g. users or clients of the Controller).

The Controller does not transfer and does not intend to transfer the Data Subject's personal data to a third country, international organization or persons other than courts for the purpose of legal proceedings, to law enforcement authorities for the purpose of criminal proceedings, to administrative authorities, to lawyers and/or notaries in the exercise of legal claims, to clients of the Controller.

In accordance with Article 12 of the GDPR, the Controller shall inform the data subject of the right of access to personal data and to the following information upon request:

The purpose of the processing, the category of personal data concerned, the recipient or categories of recipients to whom the personal data have been or will be disclosed, the intended period for which the personal data will be stored, any available information on the source of the personal data, unless obtained from the data subject, whether automated decision-making, including profiling, is taking place.

Any data subject who becomes aware or believes that the Controller or processor is carrying out processing of his or her personal data which is contrary to the protection of the data subject's private and personal life or contrary to law, in particular where the personal data are inaccurate with regard to the purpose of the processing, may:

Ask the Controller for an explanation. Request that the Controller remedy the situation. In particular, this may involve blocking, rectifying, supplementing or erasing the personal data. If the data subject's request is found to be justified, the Controller shall rectify the defective situation without delay. If the Controller does not comply with the data subject's request, the data subject shall have the right to apply directly to the supervisory authority, i.e. the Office for Personal Data Protection. The Controller shall have the right to charge a reasonable fee for providing the information, not exceeding the costs necessary to provide the information.

The Controller has not appointed a Data Protection Officer. The Controller is not a public authority or public body. The main activity of the Controller is the provision of IT services. In doing so, there are no processing operations that would require extensive or systematic monitoring of data subjects. The Controller's core business does not involve the large-scale processing of special categories of personal data or personal data relating to criminal convictions and offences. In view of the

above, there is no obligation to appoint a Data Protection Officer pursuant to Article 37 of the GDPR.

The Controller has carried out a risk assessment of the processing of personal data on the rights of individuals' freedoms, which appears to be low. Therefore, neither a data protection impact assessment within the meaning of Article 35 of the GDPR nor prior consultation of the supervisory authority under Article 36 has been carried out.

The contact person for the processing and protection of personal data is NDC Group Czech s.r.o., ID 054 32 898, with registered office at Hvězdova 1716/2b, 140 78 Prague 4.