

INFORMATION MEMORANDUM ON PERSONAL DATA PROTECTION

JANOM S.R.O.

according to the Regulation of the European Parliament and of the Council 2016/679 of April 27, 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“), (hereinafter referred to as „Memorandum“).

Enter into force: May 25, 2018

Version: 1. version

A) RECITALS

1. Memorandum on processing of personal data

- 1.1 The company janom s.r.o., established in Dohňany 464, 020 51 Dohňany, registration number (IČO): 44 357 940, registered in Business Register of the District court Trenčín, section Sro, file No.21945/R (hereinafter referred to as „Company“), hereby issues this Information Memorandum on processing personal data (hereinafter referred to as „Memorandum“) for the data subjects whose personal data are processed by the Company in particular for our customers, trade partners, job applicants in the Company and for visitors of the Company's web sites.
- 1.2 The purpose of this Memorandum is to inform you as data subjects hereinafter referred to as „You“) on processing Your personal data performed by the Company and on Your rights in relation to the processing.
- 1.3 This Memorandum may be amended by the Company. The latest version of Memorandum can be found on www.janom.com or at the company's seat in Dohňany 464, 020 51 Dohňany. We advise you to keep up to date with Memorandum as amended.

2. Our contact details

- 2.1 Should you have any questions in relation to processing of your personal data and their protection, please contact us via any of the following communication channels:
 - phone number: +421 911 346 215
 - e-mail: veronika.musakova@janom.com

3. Personal Data Protection Officer

- 3.1 The Company, in accordance with the requirements of the respective legal regulations, has designated the Personal Data Protection Officer who you can turn to with all the issues in relation to the processing of your personal data and the exercise of your rights.
- 3.2 Personal Data Protection Officer is Ing. Viera Mušáková.
- 3.3 Personal Data Protection Officer can be reached via the following communication channels:
 - phone number: +421 911 346 215
 - e-mail: veronika.musakova@janom.com

4. Glossary of Terms

- 4.1 Unless the context of this Memorandum requires otherwise, the Glossary of Terms used in this Memorandum have the meaning set forth below:

Information memorandum on personal data protection janom s.r.o.

„automated decision-making“	the decision-making on You based exclusively on automated processing of personal data (without human intervention) including profiling (see the definitions below), which has on the data subject legal effect or has other significant effects on him or her (e.g. not providing the service);
„sensitive personal data“	personal data such as racial or ethnical origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data on health status or sexual life, or sexual orientation of a natural person, and data on criminal offences or other sensitive data;
„cookies“	text (data) files containing small amounts of information (data), which are stored into the user’s computer, phone or other device when browsing web sites. As a result, in all subsequent visits of the web sites, the cookies are sent back to the web sites (or other pages), which the cookies can identify and thus the web sites are able to identify a user’s computer, cell phone or other device;
„hash“	the digital fingerprint of a specific web user’s behaviour contained in cookies;
„personal data“	information on You, which is further defined in the Article 7 of this Memorandum;
„profiling“	detailed processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to You, in particular to your economic situation, personal preferences, interests, reliability, behaviour, location;
„recipient“	a natural or legal person (other company), public authority, agency or other body, which your personal data is disclosed (e.g. Tax Authority, Social Insurance etc.);
„controller“ or „personal data controller“	a person who defines the purposes and means of processing personal data. As for processing of Your personal data within the extent specified in this Memorandum, it is the Company who is the controller of your personal data;
„data subject“	a natural person about whom we process personal data - i.e. You, in particular when you are our trade partners (or their employees), job applicants or visitors to our web sites etc.
„third country“	other country than the EU member state, Island, Norway and Liechtenstein;
„User of web sites“	a visitor to the Company’s web sites;
„the Company’s web sites“	www.janom.com

<p>„processing“ or „ processing of personal data“</p>	<p>any operation or set of operations which is performed on personal data, such as collection, recording, organization, structuring, storage, adaptation or alternation, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;</p>
<p>„provider“ or „ provider of personal data“</p>	<p>a natural person or legal person, public authority, agency or other body, which processes personal data for the Company (e.g. accounting and law firms).</p>

B) COMPLIANCE WITH LEGAL REGULATIONS AND BASIC PRINCIPLES OF PROCESSING

5. Compliance with legal regulations

5.1 The protection of Your personal data is our priority and upon processing of Your personal data we comply with all obligations and we follow all requirements stipulated by the respective legal regulations in personal data protection.

6. Basic principles relating to processing of personal data

6.1 Upon processing of personal data, we comply with the following basic principles:

Lawfulness, Fairness and Transparency

6.2 Your personal data shall be processed fairly, lawfully, and in a transparent manner.

Purpose limitation

6.3 Your personal data shall be collected (processed) for specific, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

Data minimization

6.4 Your personal data shall be processed only in an adequate, relevant and limited manner in relation to the purposes for which they are processed.

Accuracy

6.5 Only accurate personal data shall be processed and your personal data shall be updated, if necessary.

Storage limitation

6.6 Your personal data shall be processed (stored) for no longer than is necessary for the purposes for which the personal data are processed, or for the period defined by the respective legal regulations.

Integrity and confidentiality

- 6.7 Your personal data shall be processed only in a manner that ensures appropriate security of the personal data against unauthorized or unlawful processing and against accidental loss, destruction or damage.

Accountability

- 6.8 We shall be responsible for compliance with the aforementioned principles of processing and for processing of your personal data pursuant to the respective legal regulations.

C) THE SCOPE OF PROCESSING PERSONAL DATA

7. Personal data (categories of personal data)

- 7.1 Depending on Your position in relation to the Company (whether you are our customer, trade partner, a web sites' visitor etc.), the following personal data may be processed on You (categories of personal data):

Identification data

- a. data used to identify You, in particular Your academic degree, name, surname, date of birth, personal identity number, data on identity documents, data about your work position or function, driving license number, if you are a legal person - the name of the company, its seat, Company Registration Number (IČO) and others;

Contact data including electronic

- b. data used to contact and communicate with You, in particular phone number, e-mail address, identifier in communication platforms (e.g. Skype, WhatsApp), permanent residence, or temporary residence, other contact address;

Authenticating data

- c. data used to authenticate securely (verification) Your identity, in particular Your name, surname or user's identification (log in), passwords and other electronic authentication elements, car registration number;

Evaluation data

- d. data in relation to the evaluation of You - this evaluation concerns only the services provided to You;

Payment data

- e. data used to make payments, in particular your bank account number, information on payment cards or other means of payment;

Data on other persons

- f. data on your family members (name and surname, the number of children, dates of birth or personal identity numbers, phone numbers);

Data on Health status

- g. data in relation to Your health status and possible health restrictions;

Data on claims

- h. data on Your claims against the Company and the Company's claims against You arising from contractual relationships as well as outside the contractual relationships between You and the Company, such as data on your damages claim against the Company or data on the Company's claim against You e.g. by way of a contractual penalty or the unpaid price for services;

Audio-visual data

- i. data captured through audio-visual records, in particular photographs, video records, audio records (voice), which are captured by security surveillance cameras within the Company headquarters and offices;

Basic profile data

- j. data on Your basic physical characteristics (sex, age etc.) and Your basic social-demographic characteristics (sex, citizenship, civil(marital) status, the number of children etc.);

Data on credit worthiness

- k. data on Your credit worthiness, economic trustworthiness and Your payment behaviour including Your property regimes and data on possible debts, if these are essential for the contractual relationship that You have with the Company;

Contractual data

- l. data on products and/or services provided to You by the Company, on related requirements, complaints, warranty claims, service requirements including data on your communication with the Company and other related data;

Professional profile data

- m. data on Your educational achievements and professional qualifications, in particular if such data are defined in Your CVs;

IP address

- n. data on Your device that You use to visit the website;

Hash

- o. data contained in cookies in relation to Your behaviour on web sites;

Other data

- p. It is likely that also other personal data on You not explicitly defined herein are processed, however, in any case such data are necessary to fulfil the purposes specified in this Memorandum.

D) PROCESSING OF PERSONAL DATA

8. The origins of processed personal data

- 8.1** Your personal data are obtained from several sources. The primary source of Your personal data is You. Your personal data are further obtained from publicly available sources such as public directories, registers (e.g. Business Register or Trade Register), or social networks (e.g. Facebook and others).
- 8.2** Another source of Your personal data may also be cookies obtained by the Company in relation to Your activities on our Company's web sites.
- 8.3** If you would like to ask about any specific source of processing of Your personal data, please contact us.

9. Legal grounds and purposes for processing of personal data

- 9.1** Your personal data are processed on the legal grounds as follows:
- (i) due to a contract that You have entered into with our Company (e.g. Product Delivery Agreement or Services if you are our trade partner and others),
 - (ii) due to the fulfilment of legal obligation set out to the Company by legal regulations,
 - (iii) due to legitimate interests of the Company,
 - (iv) if we have been given Your consent to process Your personal data, as well as on the grounds of Your consent,
 - (v) in exceptional situations we may also process Your personal data so as to protect Your vital interests or other natural person's vital interests.
- 9.2** Your personal data are processed only for the purposes specified in this Memorandum. If, in the future, Your personal data were to be processed for any other purposes than mentioned below, we shall inform you immediately via the amendment to the Memorandum, or any other appropriate form.
- 9.3** If You would like to ask about any specific legal document with regard to processing of Your personal data, please contact us.

A. Processing of personal data due to a contract between the Company and You

- 9.4** When You have entered into a contract with us, the processing of Your personal data is particularly based on this contract (e.g. the Cooperation Agreement, Lease Contract etc.). Without processing the personal data of yours, it would not be possible at all to enter into that contract and consequently to perform it.
- 9.5** Your personal data are processed on this legal ground for the purposes as follows:

Contractual agenda

The purpose of contractual agenda comprises processing of personal data for the purposes of concluding contractual relationships with the Company, their amendments and terminations (including pre-contractual negotiations), the performance of rights and obligations from the contract concluded including the record keeping on these contractual relationships and the related communication between You and the Company.

B. Processing of personal data due to legal obligations

- 9.6 Your personal data are further processed because we are required to do so by the respective legal regulations, e.g. pursuant to the tax and accounting agenda or within archiving.
- 9.7 Your personal data are processed on the legal ground for the purposes as follows:

Tax agenda

- a) In this case, it means processing of personal data for the purposes of tax agenda, that is, for the purposes of preparation, processing and filing tax returns, tax reporting and other tax accounts, communication with the appropriate national authorities and performing other obligations laid down by tax rules.

Accounting agenda

- b) means processing of personal data for the purposes of accounting and to carry out audits, to perform registration and recording obligations, to perform reporting obligations, to communicate with the appropriate national authorities and to perform other obligations laid down by accounting rules.

Complaints agenda

- c) means processing of personal data in relation to handling complaints of the Company's services provided by our Company to our customers, related communication (including possible communication with the responsible public authorities, e.g. The Czech Trade Inspection Authority) and to keep records of complaints.

Archiving

- d) means processing personal data to archive obligations laid down by the respective legal regulations, in particular the Act on Archives and Registries, tax rules or accounting rules. In particular, to archive contractual documents, accounting documents and other written documents and documents in accordance with the legal requirements in the field of Archives. For this purpose, the Company processes personal data for the period stipulated under the law.

Audits

- e) processing of personal data in order to allow for the implementation of statutory audits in the Company e.g. accounting, tax and others;

The liaison with public authorities

- f) Processing of personal data in order to provide mandatory information to public authorities, e.g. law enforcement authorities, financial administration and others, where it involves information that we are obliged to provide the authorities with.

C. Processing of personal data on the ground of legitimate interests

9.8 Your personal data are further processed also on the ground of the so-called Company's legitimate interests, however, only under the condition that Your interests or fundamental rights and freedoms requiring the personal data protection do not take precedence over these legitimate interests.

9.9 Your personal data are processed on the legal ground for the purposes as follows:

Efficient management and administration of the Company

- a) In this case, it means processing of personal data to ensure efficient management and administration of the Company, in particular for the purposes of organization and management of the Company, to set and carry out the Company's goals, to ensure administrative processes within the Company and to fulfil obligations in the field of *Compliance* (so as to make the Company's activities and processes in compliance with the requirements of the legal regulations).

The legitimate interest of the Company is to comply with all legal regulations and internal guidelines of the Company and at the same time its interest to grow.

Marketing, promotion and advertising

- b) It means processing of personal data to promote the Company and its services. Your personal data may also be processed in relation to promoting the Company on social networks (Facebook, Instagram and others).

The legitimate interest of the Company is in the efficient marketing campaign which does not infringe Your rights.

Development and improvement of services

- c) In this case, it means processing of personal data to develop and improve the Company's services, that is, to provide improved services and to ensure highly standardized services provided by the Company. For this purpose, in particular Your identification and contact data are processed. The data are used to get feedback from our customers. Data are processed only for no longer than is necessary to improve or upgrade the Company's services.

Protection of legal interests of the Company

- d) This agenda deals with processing of personal data in relation to protection of legal entitlements and legally protected interests of the Company, whether it is the case where the Company issues a claim against You or third parties, or the cases, where the Company, on the other hand, defends itself against claims put forward by You or third parties, by out-of-court settlement, judicial settlement or enforcement order.

The legitimate interest of the Company is to protect its rights and interests, that is, to enforce the Company's claims against the third parties and to defend the Company against claims that were made against it.

Insurance agenda

- e) This means processing of personal data to make insurance claims against the Insurance company, whether in relation to accidents caused by You, or, done to You.

That legitimate interest of the Company is to make an insurance claim against the Insurance Company.

Security and Protection

- f) This means processing of personal data to ensure security in the Company including IT and network security and protection of the Company's property and property of other persons. For this purpose, the Company is equipped with security systems being able to record the access to the premises of the Company and video recording surveillance system (recording inside the Company). For this purpose, by using the video surveillance system the Company may capture audio-visual records on which You may be recorded. Video surveillance system may capture the premises of the Company, namely monitoring of any illegal or unethical behaviour of both third parties and the Company's employees. The video records are kept only for no longer than is necessary.

The legitimate interest of the Company is to protect the property of the Company and of third parties and to ensure security of persons being present at the premises of the Company.

Recruitment of new staff

- g) Your personal data are processed for the purpose of new staff recruitment, namely so as to receive, process, record CVs, select job applicants, to make job interviews, to assess the job applicants, to make job offers at the Company, and to communicate with applicants within the entire recruitment process.

The legitimate interest of the Company is to recruit new staff for the Company and thus the efficient functioning of the Company.

Database of job applicants

- h) Your personal data are further processed to keep the database of job applicants in the Company, in which we also keep personal data of unsuccessful job applicants in the Company, who are likely to be given a new job position in the Company, e.g. the Company has created a new job position, the same or similar to the post a job applicant originally applied for, or the post that the job applicant had originally applied for has become vacant).

The legitimate interest of the Company is to occupy the posts in the Company which become vacant in the future and thus the efficient functioning of the company.

In the case of a legitimate interest of the Company to keep the database of job applicants, however, we process Your personal data for a limited time only, and this for the period of three (3) calendar months from the date when the recruitment process ended. After that period, Your personal data shall be deleted from the database of job applicants and shall not be further processed by the Company, only if we have been given Your consent to process Your personal data within the database of job applicants for a longer period.

D. Processing personal data on the grounds of your consent

9.10 Your personal data are processed (may be processed) also on the grounds of Your consent to their processing, and this in the case that You have given us the consent to processing of your personal data. In that case we process the personal data in question only for the purposes of processing of personal data to which You have given us the consent.

9.11 Your personal data are processed (may be processed) also on the grounds of Your consent in some cookie files.

9.12 Giving Your consent to processing of personal data is entirely voluntary and thus you have the right to withdraw Your consent to processing your personal data at all times.

9.13 In practice, your consent may be given to us e.g. in marketing communication or profiling and processing your personal data by means of electronic communication data.

10. Recipients (categories of recipients) of personal data

10.1 Your personal data are in relation with the aforementioned purposes provided to third parties which are defined as recipients of personal data. These are companies (or natural persons), with which the Company cooperates either as our trade partners or in using the services of these companies, or while fulfilling their mandatory obligations.

10.2 These recipients of personal data may be divided into:

Recipients who are personal data providers

- a) Providers of Your personal data are the third parties which the Company uses for its own purposes, and who thus process Your personal data only for the Company (e.g. legal advisors, suppliers of software and IT systems, employment agencies).

We select only the providers who provide appropriate safeguards for the implementation of adequate technical and organizational measures necessary to ensure the protection of Your personal data.

A written contract on processing of personal data is concluded with providers at all times, the subject matter of which is to adjust the conditions of involving a provider into processing Your personal data, the adjustment of their related obligations, all with the aim to ensure adequate protection of Your personal data.

Recipients who are (independent) personal data controllers

- b) These recipients have the status of independent controllers and process Your personal data for their own purposes. These include in particular government bodies and for instance our trade partners.

No special contract on processing of Your personal data is concluded with these recipients because these persons bear the same responsibilities as the Company in relation to processing of Your personal data and thus are themselves responsible for processing of Your personal data.

10.3 The list of recipients (categories of recipients) to whom your personal data are disclosed by the Company can be found in the Annex No. 1 of this Memorandum.

11. Transfers of personal data to third countries

11.1 In specific cases, it happens (or it may happen) that Your personal data will be transferred to third countries, however, only after compliance with the conditions mentioned below as laid down by the respective legal regulations.

11.2 Your personal data are thus transferred to third countries only after compliance with some of the following conditions:

- a) under the condition that Your personal data are transferred to a third country, for which European Commission adopted a decision on adequate protection of personal data, i.e. to the third country which the European Commission has evaluated as safe in terms of protection of Your personal data (hereinafter referred to as **„Decision on the adequate protection“**); or
- b) in the case that in the matter of the concerned third country no Decision of adequate protection has been adopted by the European Commission, then:

(i) under the condition that if the recipient of Your personal data (i.e. the person to whom your personal data are transferred) provides appropriate safeguards for protection of your personal data, in particular by means of the so-called standard contractual clauses adopted by the European Commission which are concluded with the data recipient (hereinafter referred to as **„Transfers subject to appropriate safeguards“**); or (in case of non-existence of such appropriate safeguards)

11.3 Further information on transfers of personal data to third countries can be found the Annex No. 2 of this Memorandum.

12. Period of storage (processing) of personal data

12.1 Your personal data are processed (stored) only for the time needed with regard to the purposes of processing of Your personal data.

12.2 In the event of processing of Your personal data on the grounds of legal obligations, your personal data are processed during the period laid down by legal regulations, in particular tax rules and accounting rules.

12.3 In the event of the performance of the contract, your personal data are processed during the contractual relationship between You and the Company and during the following 10 years after the termination of the contractual relationship, and in particular with regard to possible future claims against You or Your claims against the Company.

12.4 In the event of our legitimate interest, your personal data are processed during the period specified according to the individual purposes, respecting the specific purpose. Further information on the period of storage of personal data processed according to the specific purpose can be found in the Annex No. 3 of this Memorandum.

12.5 If the consent to processing of personal data has been given, your personal data are processed during the period specified in the consent.

13. Automated decision-making and profiling

- 13.1** With regard to processing of your personal data, automated decision-making including profiling occur, however, based exclusively on Your consent.

14. Web links to other websites

- 14.1** Should there be web links to other websites operated by third parties on the Company's site, the websites of the third parties' are absolutely independent and are completely beyond the Company's control. The Company thus bears no responsibility for the content of any websites of the third parties' which can be accessed via the links contained on the Company's websites, and as a result, the company bears no responsibility for their content, compliance with the principles of personal data protection or their use.

15. The use of plug-ins for social networks

- 15.1** The Company's websites use plug-ins of various social networks. The plug-in of social network is the button used for sharing posts from the Company websites with other users of this social network.

- 15.2** The following social network plug-ins can be found on our websites.

Facebook

- a) This plug-in is operated by Facebook Inc., 1601 South California Avenue, Palo Alto, CA 94304, USA. The operator of facebook.com is Facebook Ireland Limited, Hanover Reach, 5-7 Hanover Quay, Dublin 2, Ireland. The plug-in has the logo of Facebook. For more information on Facebook's privacy policy, please see facebook.com.

YouTube

- b) This plug-in is operated by YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. The plug-in has the logo of YouTube. For more information on YouTube's privacy policy, please see youtube.com.

Twitter

- c) This plug-in is operated by Twitter Inc. This plug-in is operated by Facebook Inc., 1601 South California Avenue, Palo Alto, CA 94304, USA. This plug-in has the logo of Twitter. For more information on Twitter's privacy policy, please see twitter.com.

- 15.3** The design and the content of the plug-ins in the browser are determined by these social networks. The plug-ins are automatically integrated into websites.

- 15.4** If You visit any of the Company's websites via one of these plug-ins, your web browser (e.g. Internet Explorer)

automatically creates a link to the server of this social network regardless of whether you have used the plug-in. Information about you visiting the Company's sites is then shared via this link.

- 15.5 If You are logged into some of the social networks when visiting the Company's websites, the transmitted data shall be added to Your user's account on the social network. The same applies to those who use plug-ins.

E) YOUR RIGHTS

16. General information

- 16.1 This part of Memorandum contains information on Your rights relating to processing of personal data made by the Company or for the Company.

17. Right to revoke the consent to processing of personal data

- 17.1 In the event that Your personal data are processed on the grounds of Your consent, you have the right to revoke your consent to processing of Your personal data anytime, in any manner specified in the Article 18 below.
- 17.2 Your consent may be revoked entirely or only in part in relation to only some personal data of yours or only some purposes of processing.

18. Right of access to personal data

- 18.1 You have the right to obtain the confirmation from the Company of whether we process your personal data or not.
- 18.2 In the event that we do process your personal data, you have the right to access to your personal data and to receive information defined in this Memorandum.
- 18.3 We shall provide You with the access to your processed personal data by giving you a copy of the processed personal data. The first copy is provided free of charge. Other copies provided at your request may be charged a reasonable fee (having regard to the incurred admin costs).
- 18.4 The aforementioned confirmations, information and copies shall be provided to You by the Company in written or in electronic form. However, upon your request in electronic form, you will be provided with confirmations, information and copies in electronic form, unless requested otherwise.

19. Right to rectification

- 19.1 You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning You. Having regard to the purposes of processing, you also have the right to have incomplete personal data completed, including by means of supplementary additional statement.

20. Right to erasure („right to be forgotten“)

- 20.1 You have the right to obtain from us without undue delay the erasure of personal data, in the cases that:
- a) your personal data are no longer necessary in relation to the purposes for which they were collected by the Company or otherwise processed;
 - b) you have withdrawn your consent to processing, if we process your personal data based on Your consent, and at the same time where there is no other legal ground for the processing of your personal data;

- c) you have objected to processing of your personal data (*in this connection, please see in detail Article 21 below*) and there are no overriding legitimate grounds for the processing;
- d) you have objected to processing for the purposes of direct marketing;
- e) personal data have been unlawfully processed by us; or
- f) your personal data must be erased so as to comply with the legal obligation laid down by the respective legal regulations we are bound by.

20.2 In the exercise of the right to erasure and the compliance with the conditions for erasure, your personal data shall be erased by us without undue delay, except if we needed your personal data for the performance of a legal obligation, for the establishment, exercise or defense of legal claims or for archiving purposes.

20.3 If your personal data were published, having regard to available technologies and costs for the performance we shall take adequate measures including technical measures to inform other controllers who process personal data that you have asked for the erasure of your personal data.

21. Right to restriction of processing

21.1 You have the right to obtain from us the restriction of processing your personal data, in the cases that:

- a) the accuracy of your personal data is contested by You, for the period enabling us to verify the accuracy of personal data;
- b) the processing of your personal data is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- c) we no longer need your personal data for the purposes of the processing, but they are required by You for the establishment, exercise or defense of your legal claims; or
- d) you have objected to processing (*in this connection, please see in detail Article 21 below*), pending the verification whether our legitimate grounds override those of Yours.

21.2 Where processing of your personal data has been restricted upon your request, your personal data shall, with the exception of their storage, only be processed by the Company with Your consent or for the establishment, exercise or defense of legal claims, for the protection of the rights of another natural or legal person or for reasons of important public interest.

21.3 Where processing of your personal data has been restricted upon your request, you will be informed by us before the restriction of processing is lifted, if any.

22. Right to data portability

22.1 You have the right to require us to transmit your personal data (which You yourselves have provided us with) to another controller (i.e. the company by your own choice), however, only if:

- a) the processing of your personal data is based on Your consent or on a contract between the Company and You; and (at the same time)
- b) the processing is carried out by automated means (hence non-manual).

23. Right to object

23.1 On the grounds relating to your particular situation, at any time you have the right to object to processing of your personal data based on your legitimate interest.

23.2 Where you have objected, we shall no longer process your personal data unless (a) we demonstrate compelling legitimate grounds for the processing which override your interests or rights and freedoms, or (b) it would be necessary for the establishment, exercise or defense of legal claims.

23.3 You also have the right to object at any time to processing your personal data (including profiling) for the purposes of direct marketing - where you have objected, your personal data shall no longer be processed in any manner.

24. Right to compensation and liability

24.1 You have the right to receive compensation from the Company for all material or non-material damage, as a result of an infringement of the Company's obligations when processing and protecting personal data, and the Company shall be thus liable to give you compensation for the damage suffered. The company shall be also liable for the damage you suffered from the controllers whom the Company has transmitted your personal data.

25. Right not be subject to automated individual decision-making

25.1 You have the right not be subject to any automated decision-making, hence the decision-making based solely on automated processing of your personal data including profiling, which produces legal effects concerning You or similarly significantly affects You, only if this processing:

- is necessary for entering into, or performance of, a contract between You and the Company;
- is authorized by European Union law or the Czech Republic; or
- is based on your explicit consent.

26. Right to lodge a complaint with a supervisory authority

26.1 In case of doubts as to whether your personal data are processed lawfully, or if the Company does not handle your complaint on processing your personal data, you have the right to lodge a complaint with - Úřad na ochranu osobních údajov as a supervisory authority in the field of the protection of personal data.

26.2 You may complain to Úřad na ochranu osobních údajov even without the prior complaint addressed to the Company.

26.3 Where Úřad na ochranu osobních údajov does not handle your complaint, or does not deal with your request at all or if does not inform You within three months on the progress in the settlement of your complaint, against such procedures by Úřad na ochranu osobních údajov you have the right to judicial remedy.

27. Right to judicial remedy

27.1 In case of doubt as to whether your personal data are processed lawfully or if an infringement has been found in relation to processing your personal data, you have the right to an effective judicial remedy.

F) THE EXERCISE OF THE RIGHTS OF DATA SUBJECTS AND DEALING WITH REQUESTS OF DATA SUBJECTS

28. The exercise of the rights of data subjects

28.1 Your requests concerning any rights in relation to processing personal data by the Company (hereinafter referred to as „**Request/-s**“) may be submitted to the Company via:

- phone number +421 911 346 215;
- e-mail: veronika.musakova@janom.com

29. Dealing with request of data subjects

Handling requests free of charge

29.1 Unless expressly stipulated otherwise herein, dealing with requests and any follow-up measures are free of charge.

Requirements of the request

29.2 Your request must say clearly that it is submitted by You, and what you ask for from the Company. The company may ask you for more details concerning the Request or its reasons.

Receipt of the request of the data subject

29.3 Should your Request be submitted via e-mail or a web form, you will be notified of the acknowledgement of its receipt by the Company without undue delay, depending on whether the request is submitted by e-mail or in any other suitable manner.

Manifestly unfounded or excessive requests

29.4 Manifestly unfounded or excessive requests (in particular repeated requests) may be charged a reasonable fee (having regard to admin costs) or rejected. The same or similar Request shall be deemed to be repeated, if requested more than once per three (3) months.

Execution of the request of the data subject

29.5 Requests are handled forthwith and in any event within one (1) month of the day of the receipt of the Request.

29.6 In exceptional cases (in particular having regard to the complexity or the amount of all pending Requests) this time limit may be extended, by a further maximum period of two (2) months. We shall notify You of such an exceptional case to handle the Request, and at the latest within one (1) month of the day of the receipt of your Request, together with the reasons for such a delay.

29.7 Should your request be rejected, we shall notify You of this and at the same time we shall inform You on the possibility to lodge a complaint with a supervisory authority and ask for a judicial remedy.

G) CONCLUSION

30. We hope that you have understood all information in this Memorandum, and now you are reasonably familiar with your rights and our obligations in relation to the processing of your personal data.

However, if there is anything unclear in this Memorandum, or you would like to enquire about relevant information in relation to processing of personal data, do not hesitate to contact our Company via:

- phone number +421 911 346 215;
- e-mail: veronika.musakova@janom.com

H) LIST OF ANNEXES

- Annex No. 1 - List of recipients (categories of recipients)
- Annex No. 2 - Information on transfers of personal data to third countries
- Annex No. 3 - Period of storage (processing) of personal data

Annex No. 1 - List of recipients (categories of recipients)

- Consultancy services (e.g. law firms, accounting advisors, tax advisors etc.)
- Providers of personnel administration
- Providers of services in the field of the protection of property and individuals (in particular Security Agencies)
- Providers of IT services (providers of software systems and programs),
- Photographers and cameramen
- Audit firms
- Banks and Insurance companies
- Graphic and web studios, advertising agencies
- Government authorities, such as Office of Labour, Financial Administration, Law Enforcement Authorities
- Company's Trade partners
- Carriers
- Hotels and other accommodations

Annex No. 2 - Information on transfers of personal data to third countries

Third countries	Conditions for transfers of personal data to non-EU countries
<p>Andorra, Canada, Faeroe Islands, Guernsey, Israel, Isle of Man, Jersey, New Zealand, Switzerland, Uruguay</p> <p>USA (when complying with the conditions of the so-called „Privacy Shield“)</p>	<p>Transfers of personal data to these countries is done through Decision on the adequate protection.</p>
<p>other third countries</p> <p>USA (when failed to comply with the conditions of the so-called „Privacy Shield“)</p>	<p>Transfers of personal data by the Company to these countries are done mainly through appropriate safeguards provided by the respective recipient.</p> <p>Should there be inadequate safeguards provided, the transfers of personal data to these third countries are made only if such transfers are necessary to perform the contract concluded with You or on the grounds of Your explicit consent.</p>

Annex No. 3 - Period of storage (processing) of personal data

Legitimate interest	Period of storage (processing) of personal data
Efficient management and administration of the Company	no more than 5 years
Marketing, promotion and advertising	no more than 5 years
Development and improvement of services	no more than 5 years
The protection of legal interests of the Company	no more than 10 years
Insurance agenda	no more than 10 years
Security and Protection	no more than 1 year and as for video surveillance system for no more than 14 days
Recruitment of new staff	no more than 3 years
Database of job applicants	no more than 3 years