



COMPANY STATEMENT ON THE PROCESSING OF PERSONAL DATA

STATEMENT ON THE PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL ON THE PROTECTION OF NATURAL PERSONS WITH REGARD TO THE PROCESSING OF PERSONAL DATA AND THE INSTRUCTION OF DATA SUBJECTS (HEREINAFTER REFERRED TO AS "GDPR").

DATA CONTROLLER

The data controller is **ANAJ Czech, a.s.**, registered at **Dr. Polívky 31, Frýdlant, 739 11 Frýdlant nad Ostravicí**, Company ID: **26797810**, registered in the Commercial Register maintained by the Regional Court in Ostrava, Section B, Insert 10801.

ANAJ Czech, a.s. (hereinafter referred to as the "**Controller**") processes personal data of data subjects – natural persons. The data is obtained from **business cards, websites, marketing events**, or documents provided by you. The collected data primarily includes the following: **identity data** (name, surname, title), **contact details** (billing address, delivery address, email address, phone numbers), **financial data** (bank account number), etc.

In accordance with **Article 12 of the GDPR**, the Controller informs you about the processing of your personal data and your rights.

If you have any questions regarding the processing of your personal data, you can contact us at **gdpr@anaj.cz**.

PROCESSING PRINCIPLES

The Controller declares that personal data is processed in accordance with the following principles:

- **Lawfulness, fairness, and transparency** – Personal data is processed in a lawful, fair, and transparent manner.
- **Purpose limitation** – Personal data is collected for specific and legitimate purposes and is not further processed in an incompatible manner.
- **Data minimization** – Personal data is adequate, relevant, and limited to what is necessary for the purposes for which it is processed.
- **Accuracy** – Personal data is accurate and kept up to date.
- **Storage limitation** – Personal data is stored in a form that allows identification of data subjects only for as long as necessary for the purposes for which they are processed
- **Integrity and confidentiality** – Personal data is processed in a manner that ensures its security, including protection against unauthorized or unlawful processing and accidental loss, destruction, or damage through appropriate technical or organizational measures.

PURPOSES AND LEGAL BASIS FOR PROCESSING

Fulfilment or Conclusion of a Contract

The Controller processes personal data mainly for the purpose of fulfilling and concluding contracts, such as delivering ordered goods.

Legal basis: Article 6(1)(b) GDPR – Performance of a contract.



Compliance with Legal Obligations

The Controller processes personal data to fulfill legal obligations, including accounting and tax regulations, as well as demonstrating compliance with GDPR and other laws.

Legal basis: Article 6(1)(c) GDPR – Compliance with a legal obligation.

Legitimate Interests of the Controller

The Controller may process personal **data for:**

- **Direct marketing** (sending price offers, technical consultation offers, trade fairs, customer events);
- **Establishing, exercising, or defending legal claims** (e.g., claims from purchase contracts).

Legal basis: Article 6(1)(f) GDPR – Legitimate interest.

Processing Based on Consent

The Controller may process personal data based on **explicit consent** for specific purposes defined in the consent.

Legal basis: Article 6(1)(a) GDPR – Consent of the data subject.

PROCESSING METHODS AND DATA PROTECTION, CATEGORIES OF RECIPIENTS

The processing of personal data is carried out by the controller. Processing is generally conducted at the controller's registered office by the controller's employees or, where applicable, by a processor.

Processing takes place using computing technology or manually in the case of personal data in paper form, while ensuring compliance with all security principles for managing and processing personal data. To this end, the controller has adopted technical and organizational measures to ensure the protection of personal data, in particular measures to prevent unauthorized or accidental access to personal data, their alteration, destruction, or loss, unauthorized transfers, unauthorized processing, as well as any other misuse of personal data. All entities that may have access to personal data respect the data subjects' right to privacy and also guarantee protection standards in accordance with the GDPR. They have concluded data protection agreements with the controller to ensure the security of our clients' personal data.

A recipient of personal data is any entity to whom the controller provides personal data. The controller will primarily transfer personal data to the following recipients: entities providing accounting services, postal services, newsletter distribution services, legal services, IT services, payment gateway and payment system operators, domain administrators, technical support providers, etc. These recipients will process personal data either as independent controllers (i.e., entities that determine the purposes and means of processing personal data independently of the controller) or as processors (i.e., entities that process personal data on behalf of the controller based on its instructions).

Additionally, the controller will provide personal data to public authorities when required by generally binding legal regulations. These recipients will always process personal data as independent controllers. However, public authorities performing investigative duties are not considered recipients in the scope of their investigative powers.

TRANSFER TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

The controller will not transfer personal data to third countries or international organizations within the meaning of Article 44 et seq. of the GDPR.



PERIOD OF PERSONAL DATA PROCESSING

Personal data will be processed only for the period necessary in relation to the purpose of their processing. The termination of one of the legal bases for processing personal data does not affect the processing of personal data (to the necessary extent) based on another legal basis.

Performance and Conclusion of a Contract

For this purpose, the Controller will process personal data for up to 30 days after the termination of the last obligation agreed upon in the concluded contract. This does not affect the Controller's ability to further process such personal data based on other legal grounds and for the purposes specified in these principles.

Fulfillment of the Controller's Legal Obligations

For this purpose, the Controller will process personal data for the duration of the relevant legal obligation imposed on the Controller by generally binding legal regulations.

Legitimate Interests of the Controller

Direct Marketing

For this purpose, the Controller may process personal data until an objection to such processing is expressed, but no longer than **10 years** from the last purchase.

Legal Claims and Defense in Legal Disputes

For this purpose, the Controller may process personal data for the duration of the relevant legal claim, but no longer than 2 years after the expiration of the statute of limitations as determined by generally binding legal regulations. In the event of the initiation and continuation of judicial, administrative, or any other proceedings in which rights or obligations arising from the relevant legal claim are addressed, the period of personal data processing for this purpose will not end before the final conclusion of such proceedings.

Consent of Data Subjects

For the purposes specified in the data subject's consent, the Controller may process personal data for up to 10 years, but no later than the moment the consent to personal data processing is withdrawn.

RIGHTS OF DATA SUBJECTS

The Controller hereby informs data subjects about their fundamental rights related to the processing of their personal data in accordance with Article 13(2) of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data (hereinafter referred to as the "GDPR"):

a. Right of Access to Personal Data

Pursuant to Article 15 of the GDPR, every data subject has the right to obtain confirmation from the Controller as to whether their personal data is being processed, access to the processed personal data (including a copy of the processed personal data), and access to the following additional information:

- The purposes of processing,
- The categories of personal data concerned,
- The recipients or categories of recipients to whom personal data have been or will be disclosed, in particular, recipients in third countries or international organizations (and, in such cases, information on the appropriate safeguards applicable to the transfer),
- The planned retention period for personal data,



- The existence of the right to request rectification or erasure of personal data, restriction of processing, or the right to object to processing,
- The right to lodge a complaint with a supervisory authority,
- Any available information about the source of personal data if they were not obtained from the data subject.

b. Right to Explanation.

Any data subject who finds or believes that the Controller or a processor is processing personal data in a way that is contrary to the protection of the data subject's private and personal life or in violation of data protection laws may request an explanation from the Controller or processor and demand that the unlawful situation be rectified.

c. Right to Rectification.

Every data subject has the right to have inaccurate personal data concerning them corrected without undue delay by the Controller. Taking into account the purposes of processing, the data subject also has the right to have incomplete personal data completed.

d. Right to Erasure (Right to be Forgotten)

Every data subject has the right to have their personal data erased by the Controller without undue delay if one of the grounds for erasure listed in Article 17 of the GDPR applies, particularly if:

- The personal data are no longer necessary for the purposes for which they were collected or otherwise processed,
- The data subject objects to the processing for reasons related to their particular situation, and there are no overriding legitimate grounds for processing, or the data subject objects to processing for direct marketing purposes,
- The personal data have been processed unlawfully. The Controller's obligation to erase personal data upon the data subject's request does not apply if the processing is necessary for one of the reasons set out in Article 17(3) of the GDPR, particularly if processing is required for the establishment, exercise, or defense of legal claims.

e. Right to Restriction of Processing.

Every data subject has the right to request that the Controller restrict processing in any of the following cases:

- The data subject contests the accuracy of the personal data, for a period enabling the Controller to verify the accuracy of the personal data,
- The processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead,
- The Controller no longer needs the personal data for processing purposes, but the data subject requires them for the establishment, exercise, or defense of legal claims,
- The data subject has objected to processing for reasons related to their particular situation, pending verification of whether the Controller's legitimate grounds override those of the data subject. During the restriction of processing, the relevant personal data may only be processed, except for storage, with the consent of the data subject or for the establishment, exercise, or defense of legal claims, or for other reasons stated in Article 18(2) of the GDPR. The Controller will notify the data subject in advance of the lifting of the processing restriction.



f. Right to Data Portability.

The data subject has the right to receive their personal data, which they have provided to the Controller, in a structured, commonly used, and machine-readable format, and the right to transmit those data to another controller without hindrance from the Controller. Where technically feasible, the data subject may also request that their personal data be transferred directly from one controller to another. The exercise of the right to data portability must not adversely affect the rights and freedoms of others.

g. Right to Lodge a Complaint.

The rights and obligations of data subjects and the Controller in the field of personal data protection are fully governed by applicable legal regulations. Any data subject who believes that the processing of their personal data has resulted in a violation of the data protection law, the GDPR, or other legal regulations is entitled to file a complaint with the supervisory authority, which is: **The Office for Personal Data Protection** Address: Pplk. Sochora 27, Holešovice, 170 00 Prague 7, Czech Republic Website: www.uoou.cz

h. Right to Object.

The data subject has the right, for reasons related to their particular situation, to object at any time to the processing of their personal data, which the Controller processes based on its legitimate interests or the legitimate interests of a third party.

i. Right to Withdraw Consent.

In accordance with Article 7(3) of the GDPR, the data subject has the right to withdraw their consent to the processing of personal data at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. The data subject must be informed of this before giving consent.

A data subject may withdraw their consent by sending a sufficiently specific statement of consent withdrawal via email to gdpr@anaj.cz or in person at the Controller's registered office.