



Personal Data Processing Principles **MORAVIA STEEL a.s.**

Introduction

The protection of individuals with regard to the processing of personal data and the protection of personal data is one of the basic duties we fulfil in our business activity. The personal data we process are always under our control, and due to the technical and organisational measures we have taken, we are able to secure personal data against unauthorised access, loss or destruction. The purpose of this document is **to provide you information** about which personal data we process, how we source them, what purpose and how we process them, who such data can be forwarded to, how long they are processed, and what rights you have in relation to the protection of personal data.

Information about the Controller of Personal Data

Your personal data is processed by **MORAVIA STEEL a.s.**, a company based at Průmyslová 1000, Staré Město, 739 61 Třinec, Identification No.: 63474808, recorded in the Commercial Register, maintained by the Regional Court in Ostrava, Section B, Inset No. 1297, Czech Republic, (hereinafter the "**Company**"). If you need information about processing your personal data or exercise your rights below, you can do so in writing – by registered mail sent to the Company's registered office or electronically to the email address: GDPR@moravia-steel.cz.

The Scope of Personal Data Processing

We process personal data that we obtain from you – as a contractual partner (natural persons) in the negotiation, conclusion and implementation of supplier – customer agreement, contracts concluded with business partners (legal entities) as well as documentation related thereto in which your personal data are provided.

The following personal data are concerned:

- *name and surname, title, function*
- *identification and tax number of a natural person – entrepreneur*
- *address or place of business of a natural person – entrepreneur*
- *email address*
- *phone number (fixed line, mobile phone)*
- *fax number*
- *bank details*

For what purposes are personal data processed and on what legal basis

We process your personal data primarily for the purposes of entering into and performing business contracts (sales/purchase) as part of our business activity. The legal basis for the processing is in this case the performance of the contract that we enter into with you.

The purpose of processing personal data that we obtain from contracts with our business partners (i.e. personal data of statutory representatives of a business partner, employees or other persons) is the implementation of these contracts, i.e. the exercise of rights and the



fulfilment of our company's obligations as a party thereto. The legal basis for processing is our legitimate interest in maintaining and developing our business activity. The same legal basis concerns the processing of personal data for the enforcement of legal claims, if any.

We also process personal data for the purpose of fulfilling our legal obligations under generally applicable statutory provisions, in particular obligations under the accounting act and tax laws and regulations.

Recipients of the Personal Data

Your personal data is processed by our company (the Controller) only for the above purposes, and the entire processing is secured from an organisational and technical point of view so as to prevent unauthorised or unlawful processing of personal data, particularly by third parties. Your personal information is confidential to us. The Controller may, however, provide your personal data to the extent necessary and for the specified purpose also to the following persons:

- persons providing services to the Controller that are associated with the disclosure of personal data (e.g. IT services, accounting and tax advice, legal services, translation and interpreting services)
- subcontractors of the Controller for the purpose of fulfilling the concluded contracts
- governmental authorities and other persons that are entitled to request personal data by law.

When selecting persons that carry out the processing operations (processors) on behalf of the Controller, the emphasis is on their expertise, credibility and the ability to ensure the proper processing of personal data and the protection of the rights of the entities concerned from an organisational and technical point of view.

Transfers of Personal Data to Third Countries or International Organisations

Your personal data will not be provided to persons from outside the European Union.

The Period during which Personal Data Will Be Processed

Personal data will only be processed (stored) for the required period for the purposes for which they are processed. In the case of a contractual relationship, your personal data will be stored at least during the term of the contract, for the period necessary for its implementation and the exercise of rights under the contract not exceeding 10 years. For the purpose of fulfilling the statutory obligations of the Controller arising from generally applicable statutory provisions, personal data will be stored after the archiving period stipulated by law, but for a maximum of 10 years.

Profiling

Based on the provided personal data, there is no automated decision-making or profiling by the Controller.

Your Rights in Relation to the Personal Data Processing

Your personal data is processed according to the principles established by European Parliament and Council Regulation (EU) 2016/679 (hereinafter referred to as **GDPR**). Under these principles, you are entitled to rights whose smooth exercise we are required to duly ensure. The following rights are concerned:



- **Right to Information and Access to Personal Data**
You have the right to contact the Controller at any time to obtain information as to whether your personal data are processed or not, and if so, you have the right to obtain from the Controller the relevant confirmation and also access to such personal data and information to the extent specified in Article 15 GDPR. You will also be provided with a copy of the processed personal data.
- **Right to the Rectification of Personal Data**
You have the right to request that the Controller promptly rectify your inaccurate personal data or supplement incomplete personal data that they keep on you.
- **Right to the Erasure of Personal Data (“a right to be forgotten”)**
You have the right to request that the Controller erase your personal data without undue delay unless they have sufficient legal reason for their processing.
- **The Right to Restrict the Processing of Personal Data**
Until the disputed questions concerning the processing of your data have been resolved, in particular if you deny the accuracy of the data processing by the Controller or the processing is unlawful, but you refuse to erase such personal data or if you object to the processing, you have the right to request the Controller to restrict their processing. In such a case, your personal data will only be stored and without your consent they will not be processed in any other way.
- **Right to Data Portability**
In the case that the processing of personal data is based on consent or contract and the processing is done automatically, you have the right to the so-called portability of data, that is the right to receive the personal data you have provided to the Controller in a structured, commonly used and machine-readable format (e.g. in the PDF format).
- **Right to Object to the Processing of Personal Data**
If the processing of personal data is based on a legitimate interest of the Controller or for the purpose of direct marketing, you have the right to object to the processing of your personal data. In the case of a direct marketing objection, your personal data will no longer be processed for this purpose. In other cases, the Controller will assess whether they have serious legitimate processing grounds that outweigh your interests, rights or freedoms and hence they may continue processing or not. The Controller will inform you of the outcome of the assessment without undue delay.

Exercise of the Rights

You can claim your rights with the Controller in the form and contact details provided in the "Information about the Controller of Personal Data" section. Upon your request, the Controller will inform you of the measures taken, without undue delay, but no later than within one month of the receipt of the request. Such period may be extended by two more months where necessary, taking into account the complexity and the number of requests.

The Controller shall communicate to whom the personal data have been disclosed, any rectification or erasure of personal data or restriction of processing unless this proves impossible or involves disproportionate effort.



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If you believe that your rights related to the processing of your personal data have been violated by the Controller, you may also lodge a complaint with the Supervisory Authority, based at Pplk. Sochora 27, 170 00 Prague 7, www.uoou.cz.