

PRIVACY POLICY AND INFORMATION ON THE PROCESSING OF PERSONAL DATA
(hereinafter referred to as the "Policy")

Introductory provisions

- A. The protection of personal data is important to our company. This document explains what personal data CEBES a.s. collects from you and how it uses this data. These Principles have been drawn up 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 (GDPR) and in accordance with Act No. 110/2019 Coll., on the processing of personal data. The purpose of this Policy is to provide Data Subjects with basic information regarding the processing of Personal Data (in particular, information on the manner and scope of the processing of Personal Data, including the scope of the Data Subject's rights related to the processing of Personal Data).
- B. For the purposes of this Policy, the following definitions apply:
- **The personal data controller is** the commercial company
CEBES a.s.
ID No.: 25568345
VAT No.:
CZ25568345
with its registered office at Kloboucká 866, Brumov, 763 31 Brumov-Bylnice
registered in the Commercial Register maintained by the Regional Court in Brno, Section B, File 2978 (hereinafter referred to as the "Controller").
 - **The subject of personal data** is a natural person who is an employee or potential employee (or job applicant) of the Controller. For the purposes of this document, an employee is a natural person who is in an employment relationship with the Controller or in a legal relationship based on an agreement on work performed outside of an employment relationship. A natural person who enters into a contractual relationship with the Controller as a supplier or customer, or who communicates with the Controller as an authorized person on behalf of a contractual partner who is a legal entity, is also a personal data subject.
 - **Personal data includes**
 - 1. for employees
 - *identification and contact details* (name, surname, title, birth number, date of birth, address, telephone number, e-mail),
 - *photographs*
 - *information about family members* (for tax purposes and obstacles on the part of the employee – e.g., temporary incapacity to work)
 - *health insurance company details,*
 - *information about previous employment*
 - *information about education and qualifications*
 - *data related to work performance* (records of working hours, remuneration, overtime, performance evaluations, etc.)
 - *documents on completed training and education*
 - *information necessary for preparing tax returns or confirmations for tax return purposes*
 - *payment details* (bank details)

- *information about job classification and job description,*
- *information on payroll deductions*
- *any other necessary information.*

2. For potential employees

- *identification and contact details* (first name, last name, title, date of birth, home address, telephone number, email),
- *information about education, qualifications, and previous work experience,*
- *information about previous employment*
- *any other necessary information.*

3. For customers, business partners, suppliers, and buyers and their representatives:

- *first and last name,*
- *phone number or representative's phone number*
- *email address,*
- *registered office/residence address*
- *contact and/or delivery address,*
- *bank details*
- *date of birth*
- *identification number (IČ), or tax identification number (DIČ)*
- *information about business relationships and payment history*
- *number of employees.*

C. The administrator is a business entity operating in the following fields:

- Electroplating, enameling
- Machining
- Locksmithing, toolmaking
- Manufacture, installation, and repair of electrical machinery and equipment, electronic and telecommunications equipment
- Accounting consultancy, bookkeeping, tax records management
- Manufacture, trade, and services not listed in Annexes 1 to 3 of the Trade Licensing Act, fields of activity:

- Manufacture of plastic and rubber products
- Surface treatment and welding of metals and other materials
- Manufacture of machinery and equipment
- Preparatory and finishing construction work, specialized construction activities
- Trade and service intermediation
- Wholesale and retail
- Storage, packaging of goods, cargo handling and technical activities in transport
- Purchase, sale, management, and maintenance of real estate
- Testing, measurement, analysis, and inspection
- Manufacturing, trade, and services not classified elsewhere.

Within the scope of the business activities described above, the Controller processes Personal Data:

- a) to the extent that it was provided in connection with the contract, or in the course of negotiations on the possible conclusion of a contract, as well as in connection with the concluded contract and its performance; and
 - b) for the purpose(s) specified below.
- D. The Controller is the Controller of Personal Data. The Personal Data of the Data Subject is made available only to specific employees of the Controller in connection with the performance of their work duties to the extent necessary in each case and in compliance with all security measures.
- E. The Controller has implemented an information security management system in accordance with the TISAX (Trusted Information Security Assessment Exchange) standard. This system includes organizational, technical, and procedural measures to ensure the confidentiality, integrity, and availability of information, and these rules also apply to personal data. In particular, the controller uses multi-level protection through passwords and encryption, multi-factor user authentication, restricted access to data based on user roles, and regular data backups. Thanks to these measures, personal data is protected against unauthorized access, loss, misuse, or damage, and its processing takes place in a secure environment that complies with internationally recognized standards.
- F. The controller makes every effort to prevent unauthorized processing of personal data.

II. Information on the processing of personal data

A. Recipients of Personal Data

Recipients of Personal Data may include, in specific cases:

- public authorities (e.g., courts, administrative authorities)
- external providers of professional and specialized services (cloud storage providers, email campaign managers, companies providing "Verified by Customers" certificates, external accountants, tax advisors, legal advisors, or other persons involved in the performance of the Administrator's contract or obligations).

If personal data is processed by processors other than the Controller, this is done on the basis of personal data processing agreements concluded in accordance with personal data protection legislation.

B. Purposes of Personal Data Processing, Legal Titles

1. The Controller processes Personal Data for the following purposes:

- a) if you are our customers, business partners, or suppliers, or if you represent them:
 - concluding and performing contracts
 - improving the quality of services
 - marketing activities
 - statistical purposes
 - protection of our own rights and legal claims
 - protection of property and information, ensuring the security of our applications, websites, networks, systems, etc.
- b) if you are a job applicant or employee:
 - management of personnel records
 - payroll and accounting administration
 - management of labor or similar relationships

2. The legal grounds (titles) for processing personal data are:

- a) performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- b) compliance with a legal obligation to which the Controller is subject;
- c) the legitimate interest of the relevant Controller or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject requiring the protection of personal data;
- d) consent to the processing of personal data for one or more specific purposes given by the data subject.

C. Period of processing of Personal Data

The Controller processes Personal Data only for the period necessary for the purposes of their processing. It continuously assesses whether there is still a need to process certain personal data necessary for a specific purpose. If they are no longer necessary for any of the purposes for which they were processed, the Controller will destroy the data. At the same time, however, the Controller retains personal data for a specific period of time:

1. if so required by law or other generally binding legal regulation, or by a decision of an administrative authority, personal data must be archived for at least the period specified therein;
2. if the periods for storing personal data are specified in the disposal rules, then for the period defined in these schedule;

3. if it is possible or necessary to use the data in court or other disputes or administrative or other proceedings, personal data shall be stored for at least 2 years from the final conclusion of the dispute or proceedings, and if no dispute or proceedings are initiated, for at least 2 years from the expiry of the limitation or preclusion period for matters where it could be used;

4. in other cases, for at least one year from their acquisition and for a maximum of 5 years from their last use.

The personal data necessary for the proper provision of the service or for the fulfillment of the Controller's obligations, whether these obligations arise from a contract or from generally binding legal regulations, must be processed by the Controller regardless of the consent given by the Data Subject, for the period specified by or in accordance with the relevant legal regulations, even in the event of withdrawal of consent to the processing of personal data.

D. Sources of personal data

The Controller obtains personal data:

- from the Data Subject,
- from its own activities.

E. Transfer of personal data to a third country

The personal data of Data Subjects is transferred to third parties in a third country or to an international organization.

Personal data is and will be processed in electronic form by automated means, or in paper form by non-automated means.

Rights of the Data Subject related to processing

A. The data subject has the right to withdraw their consent (in cases where the processing of Personal Data is based on consent) to the processing of the Personal Data provided at any time. However, withdrawal of consent to the processing of Personal Data is not possible to the extent and for the purposes of fulfilling the Controller's legal obligations. Withdrawal of consent does not affect the lawfulness of processing based on consent given prior to its withdrawal. Withdrawal of consent also does not affect the processing of Personal Data that the Controller processes on a legal basis other than consent (i.e., in particular, if the processing is necessary for the performance of a contract, a legal obligation, or for other reasons specified in applicable law). Consent may be withdrawn by:

- by sending a written withdrawal of consent to the address of the Controller's registered office,
- by personally withdrawing consent at the Administrator's registered office, or
- by email sent to info@cebes.eu

B. The data subject has the right:

1. Be informed about the processing of their Personal Data

a) The data subject is entitled to request information from the Controller as to whether or not Personal Data is being processed. If Personal Data is being processed, the Data Subject has the right to request information from the Controller, in particular about the identity and contact details of the Controller, its representative, the purposes of the processing, the categories of Personal Data concerned, the recipients or categories of recipients of the Personal Data, the legitimate

interests of the Controller, the list of rights of the Data Subject, the possibility of contacting the Office for Personal Data Protection, the source of the Personal Data being processed, and automated decision-making and profiling.

- b) If the Controller intends to further process the Personal Data of the Data Subject for a purpose other than that for which it was obtained, it shall provide the Data Subject with information about this other purpose and other relevant information prior to such further processing.

2. Request access to your Personal Data from the Controller

The Data Subject is entitled to request information from the Controller as to whether his/her Personal Data is being processed or not, and if so, he/she has access to information about the purposes of the processing, the categories of Personal Data concerned, the recipients or categories of recipients, the period of storage of the Personal Data, information about the rights of the Data Subject (the right to request the Controller to correct or delete the data, restrict processing, or object to such processing), the right to lodge a complaint with the Office for Personal Data Protection, information about the source of Personal Data, information about whether automated decision-making and profiling takes place and information about the procedure used, as well as the significance and expected consequences of such processing for the Data Subject, information and guarantees in the event of the transfer of Personal Data to a third country or international organization. The Data Subject has the right to obtain copies of the Personal Data being processed. However, the right to obtain such a copy must not adversely affect the rights and freedoms of others.

3. Correction of Personal Data provided

If, for example, the Data Subject has changed their place of residence, telephone number, or other facts that can be considered Personal Data, the Data Subject has the right to request that the Controller correct the Personal Data being processed. In addition, the Data Subject has the right to have incomplete Personal Data completed, including by providing an additional statement.

4. Deletion of provided Personal Data

In certain specified cases, the Data Subject has the right to request that the Controller erase the Data Subject's Personal Data. Such cases include, for example, when the processed data is no longer necessary for the above-mentioned purposes. The Controller erases Personal Data automatically after the period of necessity has expired, but the Data Subject may contact the Controller with a request at any time. The Data Subject's request is then subject to individual assessment (despite the Data Subject's right to erasure, the Controller may have an obligation or legitimate interest to retain the Data Subject's Personal Data), and the Data Subject will be informed in detail about its processing.

5. Restrictions on the processing of Personal Data

The Controller processes the Personal Data of the Data Subject only to the extent necessary. However, if the Data Subject feels that the Controller is, for example, exceeding the above-specified purposes for which it processes Personal Data, the Data Subject may submit a request that his/her Personal Data be processed exclusively for the most necessary legal reasons or that the Personal Data be blocked. The request of the Data Subject is then subject to individual assessment and you will be informed in detail about its processing.

6. File a complaint with the Office for Personal Data Protection.

The Data Subject may at any time contact the supervisory authority, namely **the Office for Personal Data Protection**, with its registered office at Pplk. Sochora 27, 170 00 Prague 7, website <https://www.uoou.cz/>, e-mail posta@uoou.cz , with a suggestion or complaint regarding the processing of Personal Data.

- C. If the Data Subject believes that the Controller is processing their Personal Data in a manner that is contrary to the protection of their private and personal life or contrary to the relevant legal regulations, in particular if the Personal Data is inaccurate with regard to the purpose of its processing, they may:

- 1. request an explanation from the Controller by email at info@cebes.eu

2. raise an objection to the processing and request by email sent to info@cebes.eu that the Controller ensure the removal of the situation thus created (e.g., by blocking, correcting, supplementing, or destroying the Personal Data). The Controller shall decide on the objection without delay and inform the Data Subject. If the Controller does not comply with the objection, the Data Subject has the right to contact the Office for Personal Data Protection directly. This provision does not affect the Data Subject's right to contact the Office for Personal Data Protection directly with their complaint.
- D. The Data Subject may exercise the above rights **in writing at the address of the Controller's registered office or electronically at info@cebes.eu**
- E. If the Data Subject requests information about the scope or manner of processing of their Personal Data, the Controller is obliged to provide this information immediately, but no later than one month after receiving the request. This period may be extended by a further two months if necessary, taking into account the complexity and number of requests. In this case, the Data Subject will be informed of any such extension no later than one month after receiving the request, along with the reasons for the delay.
- F. If the Data Subject exercises their right to access Personal Data in electronic form, the Controller shall also provide the requested information in electronic form, unless the Data Subject requests a different method of providing the information.
- G. In the event of repeated and unjustified requests for a physical copy of the Personal Data being processed, the Controller is entitled to charge a reasonable fee for the administrative costs associated with this.

Final provisions

- A. All legal relationships arising in connection with the processing of Personal Data are governed by the laws of the Czech Republic, regardless of where access to them was made. Any disputes arising in connection with privacy between the Data Subject and the Controller shall be resolved by the competent Czech courts.
- B. The Controller may amend or supplement the wording of the Policy. The Controller shall inform the Data Subject of any such change at least 30 days before the changes take effect.
- C. These Principles replace all previous documents of this type and shall take effect on May 15, 2025.

COOKIE POLICY

- A. Cookies are small text files that the website of CEBES a.s., ID No. 25568345, with its registered office at Kloboucká 866, Brumov, 763 31 Brumov-Bylnice, registered in the Commercial Register maintained by the Regional Court in Brno, Section B, File 2978 (hereinafter referred to as the "Administrator") at www.cebes.eu, store on your electronic device when you visit them. The websites use cookies to enable users to navigate effectively and perform certain functions. The information contained in cookies is created by the website server and can be used when the user visits the website again from the same device. Cookies are created to record information about user behavior on the site.
- B. For example, login data or clicks on individual links are recorded. Cookies never contain sensitive data. They are not computer programs and cannot be used to spread computer viruses. Cookies contain anonymous information, i.e. they do not contain personal data, and are sent from the server of the website you are viewing to your computer, mobile phone, or other

device you use to browse the website. They will be stored on your device and only this server will be able to search or read the content of these cookies.

- C. Cookies that are required for the proper functioning of the website can be set without the consent of visitors to the site. All other cookies must be approved before being set in the browser.
- D. Cookies are divided into the following categories based on their storage duration:
- short-term, which are deleted when the internet browser is closed, or
 - long-term, which are stored in the device's browser even after it is closed, and their validity depends on their settings. You can manually delete this type of cookie from your browser.
- E. Depending on the entity that issues cookies, they can be divided into:
- first-party cookies, which are created by our service's web server and are mostly cookies necessary for the functioning of the website, or
 - Third-party cookies, which may also be stored via our website but do not originate from our applications. These are mostly these are cookies that allow us to analyze our website or share advertising content.
- F. The Administrator's website uses both "third-party cookies" and "first-party cookies." "Third-party cookies" are cookies set by entities that do not operate this website. Conversely, the term "first-party cookies" is used for cookies set by the entity that operates this website. Information about which cookies we use are "first-party cookies" and which are "third-party cookies" can be found in the section of this document below.

G. The different types of cookies we use:

a) ESSENTIAL/TECHNICAL COOKIES

These are essential short-term cookies that are used to ensure the proper functioning of our website's functional elements, such as searching our website, browsing it, playing videos, or accessing secure areas of the website. They enable basic website functions such as user login and account management. The website cannot be used properly without these essential cookies.

Name	Provider / Domain	Retention period	Description/Purpose
<code>_nss</code>	www.cebes.eu	Expires when the browser is closed	serves as protection against CRFS attacks

b) FUNCTIONAL COOKIES

These cookies are used to remember information about website visitors (e.g., language, time zone, extended content) and, based on this, offer you more convenience through improved and more personalized settings. These cookies collect and store your information only in such a way that your behavior cannot be tracked on other websites.

Name	Provider / Domain	Retention period	Description/Purpose

c) STATISTICAL/PERFORMANCE COOKIES

These cookies are used to track how visitors use the website, e.g., analytical cookies. These cookies cannot be used to directly identify a specific visitor. Thanks to this type of cookie, we can collect statistical data on how you use and browse our website, which parts of the website you visit most often, and send error reports if a problem occurs on the website. This data then helps us improve our website and web application and use the application to give you tailored recommendations. You can disable these cookies without affecting the basic functionality of our website, but the web application will be much "dumber" and you will make it much more difficult for us to improve our website and our application. You can delete these cookies at any time using your browser. We only store statistical cookies on your device with your consent.

Name	Provider / Domain	Retention period	Description/Purpose
<code>_ga / .cebes.eu /</code>	www.cebes.eu	13 months	Google Analytics cookie, used to recognize users and collect data on website traffic
<code>_ga_KFP45R3JD9 / .cebes.eu /</code>	www.cebes.eu	13 months	Google Analytics cookie, maintains session status

d) MARKETING COOKIES

These cookies track your movement on the web between different websites, e.g. content partners and banner networks. These cookies can be used by companies to create a profile of visitors' interests or to display relevant ads on other websites. They also serve to subsequently offer or display ads that may be relevant to you, helping to determine how to better target ads or videos. We only store marketing cookies on your device with your consent, which you can give us during the registration process. The use of these cookies can be disabled without affecting the functionality of our website. You can also delete these cookies using your browser.

Name	Provider / Domain	Retention period	Description/Purpose

H. DISABLING OR RESTRICTING COOKIES

You can enable or disable the collection of specific types of cookies by selecting the appropriate button in our cookie management panel with the Cookie Statement, which appears when you first visit our website.

In the "Cookie Statement" on the Administrator's website, you can select specific categories of cookies that you agree to store on your device (by clicking the "Allow" button) or disagree with (by clicking the "Reject" button).
"Reject" button).

You can change your choice of which cookies will/will not be stored on your device at any time via the cookie management panel.

You can revoke your consent to the storage of cookies on your device at any time via the cookie management panel. To revoke your consent, press the "Reject" button for the selected cookie category.

However, if you want to have more control over the storage of cookies on other websites, you can decide which ones to allow and which ones to block using your web browser.

You can disable all or only certain types of cookies. However, as mentioned above, if you disable all cookies, some parts of (not only) our website may not function properly.

For more information on disabling cookies and settings in individual browsers, see:

Google Chrome - <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en>

Mozilla Firefox - <https://support.mozilla.org/cs/kb/vymazani-cookies-dat-stranek?redirectlocale=cs&redirectslug=vymazani-cookies>

Safari - <https://support.apple.com/cs-cz/guide/safari/sfri11471/mac>

Opera - <https://help.opera.com/en/latest/web-preferences/#cookies>

I. This Policy supersedes all previous documents of this type and takes effect on May 15, 2025.