

NOTICE OF PERSONAL DATA PROCESSING FOR CONTRACTUAL PARTNERS OF Lovochemie, a.s.

This notice provides an overview of the basic principles of the personal data processing carried out by Lovochemie, a.s., registered office: Lovosice, Terežínská 57, postcode 410 02, Company ID: 49100262, incorporated in the Companies Register kept by the Regional Court in Usti nad Labem, Section B, Insert 471 (hereinafter the "Company" or "Lovochemie, a.s."), with regard to the personal data of actual or potential contractors – natural persons.

Summary of the processed (types of) data and their resources

In this section, you will learn what types of personal data about you will be processed. Personal data means any information relating to an identified or identifiable natural person (also called a "data subject"); an identifiable person is a natural person who can be identified, directly or indirectly, by reference to certain identifiers, such as name, ID number, location data, network identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of such a natural person. The personal data about you that we will process will be mostly received directly from you, or as applicable, as part of our cooperation with you. In justified cases (in particular, when outstanding amounts are being recovered), we can also search for other information about you from public sources.

The personal data of contractual partners – natural persons (hereinafter "Partners"), processed by Lovochemie, a.s. will include any data provided by such persons (typically name and surname, place of business, Company ID, VAT number, account number, contact details (email address and telephone number), date of birth, information given in a contract, invoiced and settled (outstanding) amounts, details of current deliveries and communication with Partners (or their employees)). In connection with communication with the Partner, Lovochemie, a.s. may also store some technical data, i.e. the time when communication with the Partner took place and the IP address from which it was sent. In the case of potential contractors – business owners, our company may process data obtained from public sources (e.g. their websites or advertising campaigns) to be able to contact them via telephone with the offer of services. Such basic data can be stored by us in our CRM system for the purposes of further contact.

Purposes of processing

In this section, we provide an overview of the purposes for which we will use (process) your personal data. Usually, data are used for multiple purposes. The means of processing, processing time, etc. are also derived from the specified purposes. In some cases provided for in Regulation (EU) No 2016/679, we may even process your data for another purpose than those listed below; however, these are exceptional and limited cases, for which the Regulation specifies the fulfilment of additional conditions.

The primary purpose of the personal data processing of a contractual Partner will be to enter into and fulfil the concluded contract. In this context, the data will further be used for record-keeping and the proper fulfilment of the contractual relationships of Lovochemie, a.s., to control the activities of our employees, for statistical purposes, for the further development of Lovochemie, a.s. services which the concluded contract relates to or internal administrative procedures in Lovochemie, a.s., or to recover claims and protect the rights of Lovochemie, a.s. and third parties (e.g. other contractual Partners), especially against unlawful activities. Data (specifically obtained from communicating with the Partner, such as IP address and time of communication) will also be used for the purposes of the IT security of Lovochemie, a.s. In addition, the personal data of the Partner is used by Lovochemie, a.s. to fulfil its legal obligations, in particular, under the rules regulating bookkeeping and taxes,

regulations relating to personal data protection (both of the Partner and persons acting for them), and provisions regarding the regulation of advertising, etc., for the purposes of direct marketing (particularly with regard to sending offers for our other products and services) (i.e. contact via email or telephone).

Legal basis for processing

Any personal data processing must be lawful – it must be based on any legal basis for processing specified in the Regulation. Similarly to the purpose, any data may be processed on the basis of multiple legal reasons. If none of the legal reasons exist any more, then we will cease to process your data. The possible legal grounds for processing are listed in Article 6 of the Regulation. Please note that should we process your personal data on the basis of your consent, you have the option to withdraw such consent at any time (for consent withdrawals, please contact us using the contact details below). With consent withdrawal, the legality of the processing based on the consent given prior to its withdrawal is not affected. However, the details of contractual Partners are not usually processed on the basis of a consent.

The legal basis for the processing of the personal data of Partners is the necessity to fulfil the contract (including the recovery of claims), the legitimate interests of Lovochemie, a.s. (derived from the interest to keep records of contractual relations and interest in protecting their rights against unlawful activities including IT security and further development of products or services of Lovochemie, a.s., processing for direct marketing) and third parties (in particular other contractual Partners involved in the fulfilment, in which the Partner will also participate) and compliance with legal requirements (in particular the prevention of offences, fulfilment of requirements under laws and regulations on personal data protection, in particular Act No. 101/2000 Coll. and Regulation No (EU) 2016/679), account-keeping and fulfilment of obligations under tax legislation.

Right to object

The right to object is your very important right. It allows you to review the processing carried out on the basis of our so-called legitimate interest if it can be justified by your specific situation – i.e., also when the processing as such is permissible, but you have specific reasons why you do not want the processing to take place. However, the option to object shall not apply to all cases of processing, e.g. it may not be applied when we process your details that are necessary for the fulfilment of the contract or when we are required by the law to process them. The right to object is enshrined in Article 21 of the Regulation.

If the legal grounds for processing the personal data of the Partner is a legitimate interest of Lovochemie, a.s. (this applies to, including but not limited to, data processing for IT security purposes, for statistical purposes and for the further development of the customer-supplier relations of Lovochemie, a.s. and the protection of the rights of Lovochemie, a.s. and the rights of third parties), the Partner for reasons related to their particular situation has a right to raise an objection against such personal data processing at any time. In such a case, Lovochemie, a.s. will no longer process such personal data, unless serious justified reasons for processing are established that will prevail over the interests of the Partner or their rights and freedoms, or unless they are processed to determine, exercise or defend legal claims. Objections against the processing may be raised by the Partner using the contact details given below or preferably via email to personal.udaje@lovochemie.cz. In your email, please indicate your specific situation that leads you to believe that Lovochemie, a.s. should not process the data.

In the event of data processing for direct marketing purposes (sending out marketing communications), a Partner may always raise an objection without giving a reason, thus in this case you do not need to give any reasons why you do not wish to continue to receive marketing

communications. In such cases, you may best raise your objection by unsubscribing from receiving further communication by clicking the link which is usually embedded in them for this purpose. Please note that even in the cases above, there will be sometimes parallel personal data processing for other purposes that will justify that Lovochemie, a.s. may continue to process such data.

Time for which the data will be processed

Our company cannot process your data for an indefinite period of time and processing time is limited to the periods when we really need your data. We try to limit the duration of such periods to reflect both your and our interests. Sometimes it is difficult to determine the time required or, for processing or for safety reasons, it is not appropriate to communicate the exact length of time. Below you will find at least some of the criteria that we use to determine the duration of the processing time of your data.

Contact details of Partners for purposes of sending business communications will be processed by Lovochemie, a.s. until the Partner expresses their disagreement with receiving such communications. Even then, Lovochemie, a.s. will process basic information about why the Partner received business communications for a reasonable period of time to demonstrate the legitimacy of such communications.

Personal data will be processed for a reasonable period of time with regard to the purpose of processing (e.g. contracts will normally be kept for a period of 10 years following their termination). If the processing time is specified by legal regulations, your personal data will be processed for such a period of time, unless the reasons below justify a longer time for the processing. In determining the adequacy of the personal data processing time, the following aspects will be additionally taken into consideration (i) the length of the period of limitation, (ii) the likelihood that legal claims will be filed, (iii) the usual procedures in the market, (iv) the probability and significance of imminent risks and (v) any recommendation by the supervisory authorities.

Data updates

One of our obligations as a personal data controller is to process accurate data, where appropriate, and in light of the circumstances, to supplement any incomplete data. By providing us with information regarding any changes to your data, you will help us to comply with this obligation properly.

If there is a change in any provided details or data submitted by another Partner, we kindly ask you to send us information about such a change.

To update your data, you may contact Lovochemie, a.s using the following contact details, preferably via email at osobni.udaje@lovochemie.cz.

Business communications

We may also process information about our potential, current or previous Partners for the purposes of so-called direct marketing, which is typically sending emails or telephone contacts with offerings of similar products or services to those you received from us in the past. The sending of offers is not limited in time, but should you no longer wish to receive such offers, we will not send them to you. However, for a reasonable period of time, we will continue to process basic details of the offers sent to be able to demonstrate why we were sending these offers to you. We will not transfer your data for the purposes of sending offers to any other third parties (excluding our sub-contractors – processors who will carry out the data processing for us).

The Partner acknowledges that they will receive business communications from Lovochemie, a.s. within the meaning of Article 7 of Act No. 480/2004 Coll. to their address (including email), that they

will be contacted via unsolicited direct mail containing business communications related to products, business and services of Lovochemie, a.s. The Partner may refuse to receive such communication at any time at the registered office of Lovochemie, a.s. or via email to osobni.udaje@lovochemie.cz. Such a refusal – unless expressly specified otherwise by the Partner – has no effect on receiving other business communications than those the Partner responds to.

How the processing will be performed and its consequences

Today, most of the processing is computer-driven, so we will usually process your data in a computer system (e.g. in our CRM system, as part of the Outlook application, with regard to emails, in our accounting system, with regard to any data that are necessary for invoicing, etc.). Of course, this will not exclude the processing of documents in filing systems for the storage of hard-copy contracts or files of business cards kept by each of our employees.

Lovochemie, a.s. will process the personal data in particular in its computer systems and computer systems of processors. Lovochemie, a.s. will process documents in its filing system. The provision of the processed data by the Partner is voluntary (however, without providing certain data, the contract will not be concluded and in some cases, some data are required by law, in particular by the accounting regulations).

Birth certificate number

Your birth certificate number will be processed, should you state so voluntarily in the contract or should it be required by legal regulation (unless explicitly specified by legal regulation, our company does not insist that you provide your birth certificate number in the contract, therefore, you should rather avoid filling it in when completing the contract).

Should the Partner – a natural person provide Lovochemie, a.s. on the basis of or in connection with the concluded contract for work, details of their own birth certificate number, they agree, as a bearer of that birth certificate number within the meaning of Section 13c(1) of Act No. 133/2000 Coll. that Lovochemie, a.s. may use this birth certificate number for record-keeping of contracts, deliveries and the protection of rights of Lovochemie, a.s., to keep them on file, to process and use them for this purpose. Any withdrawal of consent pursuant to this Article shall not affect the right of Lovochemie, a.s. to process the information and data arising from the relevant legislation or for other purposes, unless expressly provided otherwise.

Transfers of personal data to other persons (recipients of personal data)

Not all of the personal data processing is carried out by our company itself. For such processing, we sometimes hire third parties, so-called personal data processors. We make every effort to select only those processors which are sufficiently trustworthy.

Lovochemie, a.s. may disclose personal data to third parties only in cases when it is required or permitted to do so by law or with the consent of the Partner. Lovochemie, a.s. makes personal data accessible only in the standard scope to processors or other recipients – external service providers (typically suppliers of programming or other support technical services, computer systems, server services, distribution of email and providers of filing services, operators of (backup) servers of operators of technologies utilised by Lovochemie, a.s., who process them to ensure the functionality of relevant services, tax advisers and auditors who process them to provide consulting services, or persons forming a group with Lovochemie, a.s.) Personal data related to debtors may be made available to a company providing insurance on claims or other companies for the purpose of claim recovery. Upon request or in the case of suspected infringement, personal data may also be provided to the public authorities.

International personal data transfers

While under the Regulation the principle of free movement of persons within the EU applies, the Regulation limits transfers of personal data to foreign countries outside the EU. As standard, our company does not transfer personal data to foreign countries outside the EU. However, it may be the case that your personal data will be processed in a computerised system, the servers of which will be located outside the territory of the EU, even though we try to avoid such situations. With regard to usual systems used in business, these would only be server-driven systems located in the United States of America. In such a case, we choose a company that will meet the conditions approved by the European Commission for the secure transmissions of data between the EU and the US, the so-called Privacy Shield, as our contractual partner. Should we transfer your personal data outside the EU, we will inform you of this as appropriate.

Risks and recommended procedures

Each personal data processing procedure will entail certain risks. These may vary with regard to the scope of the data processed and how they are processed. Below you will find some of the best practices that can help you to protect your data:

- If you provide us with your details, always consider whether it is necessary to provide the given data in the first place. In particular, you should consider carefully whether you provide any data that relate to your personal life and its aspects that are not related to the purposes for which the data is provided or data intended for publication (e.g. your comments under articles, etc.). If you feel that we require too much data from you, please contact us and we will examine the appropriateness of our request.
- If you provide us with or make public in our services, any third-party data (for your family members or other employees of your company, etc.), consider whether this is necessary. If it is necessary, request the consent of such third parties.
- Should any of our colleagues ask you to provide your personal data, please feel free to ask whether this is necessary and whether the objective of the processing can be achieved without such data.
- Persons under 18 years of age are particularly vulnerable. Should transfers of data relate to such persons, all circumstances must be thoroughly considered. At the same time, it is necessary to consider whether the provision of such information requires the consent of such persons or their legal representatives (e.g. parents). If you are a person under 18 years of age or if you have doubts about making the right choice, discuss the whole matter with your parents or contact us.
- When you log into our systems via a password, always use a unique strong password that you do not use for another devices and access. Do not tell and do not disclose your password to anyone, not even to our employees. We will never require you to provide us with your password, and more specifically, beware of email requests to provide your password, even if they are signed on behalf of Lovochemie, a.s. They are probably fraudulent attempts to extract your password from you and misuse it.
- If you send us confidential data, try to use a secure method of communication, e.g. via a password-protected file with encryption, providing the password via another channel of communication.
- Should you feel that our company fails to comply with all obligations, there has been an unauthorised data leak or that someone is posing as one of our colleagues, please tell us as soon as possible, either via electronic means at our email address personal.udaje@lovochemie.cz, or by mail sent to our address of Lovochemie, a.s. registered office: Lovosice, Terežínská 57, postcode 410 02.
- We will always make every effort to keep this notice up to date. Therefore, we may make modifications to these rules from time to time. We will specifically inform you of more substantial changes; however, there is no harm in reviewing these rules from time to time.
- Keep your data used in interfaces with the service up to date.

Advice on the rights of data subjects

Advice pursuant to Act No. 101/2000 Coll. on personal data protection for the period until 24 May 2018

Pursuant to the provisions of Sections 5, 11, 12 and 21 of Act No. 101/2000 Coll., on personal data protection, we hereby inform all natural persons (so-called data subjects), whose data are processed by Lovochemie, a.s. of their following statutory rights:

Each data subject shall have the right to access their personal data and the right to correct their personal data. Every data subject who finds or believes that the controller or processor is performing the processing of their personal data in conflict with the protection of the private and personal life of the data subject or in violation of the law, particularly if the personal data are inaccurate with regard to the purpose of their processing, they may require explanation from the controller or processor, and require the controller or processor to remedy such a situation. Specifically, this may include blocking, correcting, supplementing or disposing of personal data. If the data subject's request is found to be justified, the controller or processor will immediately remedy the defective situation. Should the controller or processor fail to accommodate the request by the data subject, the data subject may bring the matter before the Office for Personal Data Protection (this procedure does not prevent the data subject from raising their concern before the Office for Personal Data Protection). Should the data subject suffer another harm than property damage as a result of personal data processing, the claim is filed according to a special law.

Advice for the period from 25 May 2018 under European Parliament and Council Regulation (EU) No. 2016/679 (hereinafter the "Regulation"):

Against our company, as a personal data controller, the natural person may:

- a) require access to the personal data processed by the data controller, which means the right to obtain confirmation from the controller that the personal data relating to them are or are not processed and if this is the case, they have the right to gain access to such personal data and other information referred to in Article 15 of the Regulation,
- b) require the correction of personal data related to them that are being processed where such data is inaccurate. With regard to the purpose of the processing, in some cases they have the right to require to supplement any incomplete personal data,
- c) require deletion of the personal data in instances provided for in Article 17 of the Regulation,
- d) require limitations with regard to the data processing in instances provided for in Article 18 of the Regulation,
- e) obtain any personal data related to them, and
 - (i) that we process with their consent, or
 - (ii) that we prepare for the fulfilment of the contract, the party to which is such a natural person or to take measures adopted before conclusion of the contract upon their requestIn a structured, standard and machine-readable format, in which they may transfer such data to another controller, and under the conditions and within the limits laid down in Article 20 of the Regulation, and
- f) invoke the right to object against the data processing within the meaning of Article 21 of the Regulation for reasons related to their specific situation.

Should we receive such a request, we shall inform the petitioner of any measures taken without undue delay, in any case, within one month following the date when the request was received. If necessary and with a view to the complexity and number of requests, this time period may be extended for another two months. In some cases provided for in the Regulation, our company may not accommodate the request in whole or in part. This will be specifically be the case if the request is

clearly ill-founded or unreasonable, in particular because it is repetitive. In such cases we may (i) charge a reasonable fee reflecting the administrative costs associated with the provision of the required information or communication or with undertaking the required acts or (ii) refuse to accommodate the request.

Should we receive the request above, but we have reasonable doubts as to the identity of the petitioner, we can ask for the provision of additional information necessary to confirm their identity.

Should the Partner believe that Lovochemie, a.s. is processing their personal information unlawfully or that it otherwise violates their rights, they may file a complaint with the supervisory authority (i.e. the Office for Personal Data Protection) or may seek protection before the court.