



## Information on Personal Data Processing

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#### 1) What is the point of this document?

The point of this document is to provide you with information on the conditions under which your personal data will be processed.

This memorandum concerns you if you are

- a business partner or person representing a business partner

some of the following companies belonging to the SPEDICA holding:

Company **SPEDICA, s.r.o.**

registered office at Sokolov, Jednoty 1931, postcode 356 01

Business ID No.: 279 85 334

incorporated in the Commercial Register kept by the Regional Court in Plzeň, Section C, File 20116

Company **SPEDICA LOGISTIC, s.r.o.**

registered office at Sokolov, Jednoty 1931, postcode 356 01

Business ID No.: 280 39 718



incorporated in the Commercial Register kept by the Regional Court in Plzeň, Section C, File 22357

**Company SPEDICA AGRO, s.r.o.**

registered office at Sokolov, Jednoty 1931, postcode 356 01

Business ID No.: 280 46 765

incorporated in the Commercial Register kept by the Regional Court in Plzeň, Section C, File 22690

**Company RAILSPED, a.s.**

registered office at Sokolov, Jednoty 1931, postcode 356 01

Business ID No.: 483 60 295

incorporated in the Commercial Register kept by the Regional Court in Plzeň, Section C, File 15266

**Společnost RM LINES, a.s.**

registered office at Sokolov, Jednoty 1931, postcode 356 01

Business ID No.: 272 74 489

incorporated in the Commercial Register kept by the Regional Court in Plzeň, Section B, File 1641

All of the above companies are hereinafter collectively referred to as “**SPEDICA**“. When referring to "us" or "company" in the memorandum text, all the above companies are meant.

## **2) Who is responsible for the processing of my personal data?**

The mentioned companies of the SPEDICA holding are the controller of personal data responsible for their proper processing.

## **3) How can I contact the personal data controller?**

Contact information of all SPEDICA companies is as follows:

- address: Jednoty 1931, 356 01 Sokolov
- Tel. +420 352 676 901
- e-mail: [gdpr@spedica.cz](mailto:gdpr@spedica.cz)
- Internet: <http://www.spedica.cz>

As regards the protection of your personal data, you can contact your personal data protection officer directly at [gdpr@spedica.cz](mailto:gdpr@spedica.cz).

## **4) What categories of personal data will be processed?**

SPEDICA processes the following categories of personal data:

## I. DATA ON BUSINESS PARTNERS AND REPRESENTATIVES OF THE BUSINESS PARTNER

- Identifying information: name, surname, title(s), date of birth, place of residence
- Contact details: phone number, e-mail address, correspondence address
- Banking connection: name of banking institution and account number
- Data on the contractual relationship and its implementation

### **5) What is the legal basis for the processing of personal data?**

SPEDICA processes personal data on the following legal basis

#### (a) Fulfilment of obligations arising from legislation

SPEDICA processes your personal data as required by the Commercial Code and other legislation.

#### (b) Contract performance

SPEDICA processes your personal data in order to exercise the rights and fulfil the obligations arising from the contracts made between you and the SPEDICA Group.

#### (c) Safeguarding rightful interests of the company

This concerns cases where the processing of personal data is necessary to protect the controller's interests.

#### (d) Consent to personal data processing

SPEDICA is not currently processing any personal data based on a consent but may do so if you give your consent to SPEDICA.

### **6) For what purpose will personal data be processed?**

Your personal data will be processed for the following purposes

#### (a) Preparation of contractual documentation, documentation amendment in the course of contractual relationships

- SPEDICA processes the data necessary to process or modify the contractual documentation
- Legal basis for processing: contract performance

#### (b) Exercise of rights and obligations under the contract



- SPEDICA processes personal data in order to fulfil the rights and obligations arising from existing contractual relationships
- Legal basis for processing: contract performance

#### (c) Verification of credibility

- Inspecting the insolvency register, international sanction lists, etc.

#### (d) Accounting and tax agenda, archiving of documents

- Legal basis for processing: fulfilment of obligations arising from legislation, rightful interest
- Relevant legislation: Accounting Act, Income Tax Act, Act on Archiving

#### (f) Disputable agenda: determination, exercise or advocacy of our legal claims including debt recovery

- Legal basis: execution of contract, rightful interest

#### (g) Sending commercial offers

- We may use your contact information for sending offers to extend existing cooperation
- Legal basis for processing: rightful interest

### **7) Where are my personal data stored?**

Your personal data are held in both electronic and physical form (printed). Documents in electronic form are stored on local disks of employees' workstations (the disks are encrypted). Documents in physical form are kept in lockboxes, to which only authorised persons have access.

### **8) Who will have access to my personal data outside of the SPEDICA Group?**

We process and store the personal data you have provided us within the SPEDICA Group. If personal data processing is based on the above rightful interests and purposes, your personal data may also be processed by external collaborators of the SPEDICA Group, its contractual partners and/or other subsidiary companies. The entities that cooperate with us are carefully selected on the basis of guarantees ensuring the technical and organizational protection of the personal data we transfer.

### **9) Will my personal data be transferred outside of the Czech Republic?**

Within the European Economic Area ("EEA"), the regime of free movement of personal data is valid and the same rules apply to their processing as in the Czech Republic. In some cases, our contractual partners may process personal data in third countries



(i.e. countries outside of the EEA), but always meeting all legislative requirements.

#### **10) How long will my personal data be stored by your company?**

On principle, we process your personal data for the duration of the contractual relationship of the relevant business partner with the SPEDICA Group. Upon termination of the contractual relationship, only those documents or personal data are retained in which we have a rightful interest (contingent defence of our interests in the event of a dispute) for a period of 10 years from the termination of the contractual relationship with the SPEDICA Group and/or those documents or personal data that we are bound to keep according to the legislation.

In accordance with the principle of data minimisation, in all cases we only process that personal data we necessarily need for a given purpose and store them for the necessary time. After a given amount of time has elapsed, the personal data are deleted or anonymized.

#### **11) What are my rights in relation to the processing of personal data?**

You have the right to request access to your data at any time - this means that based on your request, we will provide you with information about what kind of your personal data are processed by us, to what purpose, from what source these personal data have been obtained, to whom your personal data have been provided and what the scheduled time is for which they will be stored.

You have the right to request rectification of any inaccurate personal data at any time, or their completion if these are incomplete. You also have the right to request the deletion of personal data that are no longer needed for the purpose for which they were originally collected or which the controller is no longer entitled to use for other reasons (e.g. they were processed without authorisation, their deletion is imposed by law, etc.).

You have the right to request the limitation of processing of your personal data - this means you may ask us not to delete any of your data that we would otherwise be obliged to delete, and you may also ask us not to continue using your personal data until it is clear that the data processed are accurate or that your objection to the processing of your personal data has been raised for cause (see the right to raise objection below).

You have the right to portability of your personal data - this means you may request that we provide you the personal data processed by us in electronic form so that they are easily transferable to another controller (service provider) and/or that we pass these data directly to another controller. This right applies only to personal data we have obtained in electronic form based on your consent or a contract made.

You have the right to raise objection to the processing of your data for the purposes of direct marketing at any time (sending of commercial offers). If you do so, your personal data will no more be used for this purpose. You also have the right to raise objection to the processing of your personal data, which is based on our rightful interest – in such a case we



will continue processing your data only if it is shown that there are serious legitimate reasons for doing so.

If your personal data are processed based on your consent, you have the right to withdraw your consent at any time. In such a case, the processing of personal data will be terminated immediately.

**12) How can I enforce my rights?**

Your rights (including the right to raise objection) should be enforced with the personal data controller (see point 2 of this memorandum). You can contact us in writing or by e-mail (contact details are given in point 3 of this memorandum).

**13) How to proceed if I believe that a transgression of the law and/or violation of the regulation on personal data protection has occurred during processing of my personal data?**

In such a case, you have the right to file a complaint with the Office for Personal Data Protection, Pplk. Sochora 27, 170 00 Praha 7; Tel. +420 234 665 111; e-mail: [posta@uouu.cz](mailto:posta@uouu.cz), Internet: <https://www.uouu.cz>.

**14) Does automated decision making including profiling occur in the processing of my personal data?**

Automated decision making is meant to be machine (computer) decision making without any human intervention and with legal or other similarly substantial consequences for you (such as non-conclusion or termination of the contract). There is no such processing of your personal data in the SPEDICA Group; the appropriate steps are always decided by a specific employee of the company.