

Privacy Protection Policy of 21 May 2018 (updated on 1 October 2022)

Dear Client,

We would like to inform you, how we in the Czech Mill a. s. Company (hereinafter referred to as “*we*” or “*our company*”) process your personal data in connection with our business activities.

Scope of this document is to provide you information about, in particular, how do we collect and handle your personal data, where do we receive them from, to whom we may provide it, who can get information regarding your personal data, as well as information regarding your individual rights in privacy protection area. While processing personal data we proceed in line with generally binding legal regulations and data are always processed only in the extent depending on specific service and/or processing purpose.

Please review content hereto and we are always available to answer any questions you may have in our headquarters at Dětmárovice 1300, 735 71 Dětmárovice, through email dpo@czechmill.eu and/or by phone at +420 596 512 434.

Available for you is also our Privacy Protection Officer, Ms. Ing. Jana Zimová, email: dpo@metalimex.cz, phone + 420 224 492 243.

I.
General information

Due to its business activities, our company shall process certain personal data, in particular to meet its legal and contractual liabilities. In this regard, without providing your personal data we would not be able to provide you products/services at all.

Furthermore, we also process personal data beyond our obligations, namely for the purpose of job offerings or other contact with you. For this purpose we need your consent.

I.1. Personal Data Processing Principles

While processing your personal data we keep and respect the most stringent possible privacy protection standards and follow, in particular the following principles:

- (a) We always process your personal data for clearly and understandably determined purpose, using established means, in stipulated way and only for the time period necessary based on processing purpose: we only process precise personal data of clients and we assured such elaboration corresponds to established purposes and is necessary for meeting such purposes;
- (b) We protect your personal data as confidential information; therefore we process clients' personal data in the way assuring the highest possible security of such data and impeding any unauthorized or accidental access, change, cancellation, or loss,

unauthorized transfers, unauthorized processing, or any misuse of clients' personal data.

- (c) We shall always inform you clearly on processing of your personal data as well as of your rights for full and complete information regarding circumstances of such processing, as well as any other your rights.
- (d) In our company we introduced and maintain adequate technical and administrative measures to ensure proper security corresponding to all risks; any person to whom such clients' personal data are disclosed shall keep any and all information gained in connection with processing of such data fully confidential.

II.

Personal Data Processing Information

II.1. Information on Controller

We, i.e. Czech Mill a.s., having its registered seat at Dětmarovice 1300, 735 71 Dětmarovice, Company Identification Number (IČ) 2777 97 26, registered in the Commercial Register held by the Country court in Ostrava under File No. B 3104, are Controller of your personal data.

II.2. Processing purposes and legal basis of processing

II.2.1. Processing your personal data without your consent

These usually refers to situations, when you have to provide us certain personal data as condition for us to be able to provide you our product/service, or cases, when we are entitled to process your personal data acquired otherwise.

- (a) Based on the law, we are entitled to process your personal data without your consent for the purpose of fulfilling our legal obligations, in particular:
 - (i) to avoid occurrence of damage to property of our company;
 - (ii) to prevent fraudulent acts to which our company is exposed;
 - (iii) to meet any our obligations of identification and review of the client pursuant to law of certain measures against legalization of proceeds from crime and terrorism financing.
- (b) To execute or fulfill our contract with you.

This refers mostly to actual fulfillment of contractual relationship or any other performance of the contract between our company and you. Personal data are needed, amongst other things, to make it possible to fulfill the contractual relationship without inadequate legal risks, including negotiations on execution or change of the contract with you;

- (c) To protect rights and legal interests, in particular to:

- (i) protect rights and legal interests of our company, execution of receivables, execution of security or other execution of receivables, development and evolution of services provided;
 - (ii) negotiate with potential transferees on receivables of our company against the client or other form of transfer or assignment of receivable, including connected execution and further connected negotiations with third parties, in particular, to inform providers of respective security, etc.;
 - (iii) to solve any disputable agenda, in particular for the purpose of court or other proceedings.
- (d) Our legitimate interests.

This refers in particular to situations when contractual/customer relationship exists between you and our company.

II.2.2. Processing your personal data with your consent

This usually refers to situations, when you voluntarily consent with our processing of your personal data. Based on your consent, our company processes your personal data for the below mentioned purposes:

- (a) to offer job positions or other contact with you in this connection.

II.3. Scope of processed clients' personal data

Our company processes your personal data in the extent necessary to meet below mentioned purposes. We process **contact details** (contact addresses, phone numbers, email and fax addresses or other similar contact details) and **identification data** (name, surname, date of birth, permanent residence address, type, number and validity of personal ID; in the case of client - natural person - entrepreneur, also Company Identification Number (IČ) and Tax Identification Number (DIČ), as well as **CCTV records**.

II.4. Personal Data Processing Methods

Method used by us to process your personal data includes both manual and automated processing in IT systems of our company as well as in physical form.

Your personal data are mostly processed by employees of our company and, in extent necessary, also third persons. Before disclosing any of your personal data to a third person, we always execute a written agreement with such person including the same guarantees for personal data processing arising from legal obligations implemented also by our company itself.

II.5. Personal Data recipients

Personal data of our clients will be disclosed in particular to employees of our company in connection with fulfillment of their job duties for which it is necessary to handle clients' personal data, however only in the extent necessary for each specific case and while fulfilling any and all security measures.

Beside this, your personal data are also provided to third persons participating on processing of personal data of our company's clients, or such personal data may be disclosed to them for other reasons arising from the law.

Such data are usually disclosed to:

- (a) our legal office;
- (b) advisory services providers; and
- (c) processors providing us their server, web, cloud, and IT services.

Prior to disclosing any of your personal data to a third person, we always execute a written agreement with such person drafted by us in the way to include the same guarantees for personal data processing arising from legal obligations implemented also by our company itself.

II.7. Transfer of personal data abroad

Your personal data shall be processed in the territory of the Czech Republic, and shall not be transferred to any other country outside the European Union.

II.8. Personal Data Processing Term

Clients' personal data are processed by our company only for the term necessary for the purpose of their processing. We continuously review continuation of processing of personal data for each specific purpose. If we establish, that they are no more necessary for any of original processing purposes, we dispose such data. However, internally we assumed usual time of use of personal data for certain processing purposes, after elapse of which we carefully consider the need of processing such data for specific purpose. In this context it applies that personal data processed for the purpose of:

- (a) contract fulfillment, we process such data for the duration of relationship with such client; furthermore, such data are usually usable for the period of ten years, except of any longer processing period established by generally binding legal regulations;
- (b) offering job vacancies, we process such data for the period of 6 as of the termination of recruitment process;
- (c) protecting rights and legal interests using CCTV camera records; furthermore, such personal data are usually usable for the period of thirty days.

II.9. Consent withdrawal right

In this notification we informed you of reasons for which we need your personal data, as well as the fact that for some purposes, we only can process your personal data based on your consent. You are not obligated to grant consent with personal data processing and, at the same time, you are entitled to withdraw such consent anytime. We would like to remind you that we may be entitled to process some of your personal data also without your consent. If you withdraw your consent in such a case, we terminate processing your personal data for purposes

requiring respective consent, however we may still be entitled or even obligated to process the very same personal data for other purposes.

In the case you wish to withdraw your consent with personal data processing, please contact us on address of our seat at Dětmárovice 1300, 735 71 or at email address dpo@czechmill.eu.

II.10. Personal Data resources

We get clients' personal data in particular:

- (a) from clients themselves;
- (b) from publicly available resources (public registers, records, or lists);
- (c) from potential job candidates;
- (d) generated by our own activities, based on processing and elaboration other clients personal data;
- (e) from CCTV camera records.

II.11. Your rights in connection with our personal data processing

Any and all your rights you can enforce at our seat at Dětmárovice 1300, 735 71 Dětmárovice or by sending email to the address dpo@czechmill.eu. At the same time you are entitled to file a complaint by Controlling Body being the Office for Protection of Personal Data (www.uoou.cz).

II.11.1. Access right means that you may ask us anytime to provide you confirmation that your personal data are or are not processed and if so, for which purposes, to whom they are disclosed, for how long shall we process such data, if you have right for rectification, cancellation, limitation of processing or raise objection, information on where did we get your data from and if based on your personal data processing any automatic decision making is made, including any profiling. You shall also have the right to receive a copy of your personal data whereas the first provision is free, and we may ask for reimbursement of administrative costs for any further provisions.

II.11.2. Rectification right means that you may ask us anytime to rectify or amend your personal data if they prove inaccurate or incomplete.

II.11.3. Cancellation right means that we shall cancel your personal data if (i) they are no more necessary for purposes for which they were collected or otherwise processed, (ii) processing is illegal, (iii) you raise your objection against processing and if there are no prevailing legitimate reasons for processing, or (iv) we are obligated to do so based on law.

II.11.4. Right to limit processing means that if we fail to resolve any disputable issues regarding processing of your personal data, we shall limit processing of your

personal data, or, the case may be, we may use them to determine, enforcement, or defense of legal claims.

II.11.5. Rights to raise objection means that you may raise objection against processing of your personal data we process for direct marketing purposes or based on legitimate interest. If you raise objection against direct marketing purposes processing, your personal data shall no more be processed for this purpose.

III. Final provisions

III.1. This notification is issued for indefinite period of time and shall become effective on 1 October 2022.

III.2. We are entitled to amend this notification anytime by issuing its new full wording; its applicable wording shall be published on our company's website. At the same time, they shall be available at our seat.

III.3. Unless expressly stipulated otherwise, any information herein shall also apply to processing of personal data of potential clients, i.e. persons we still did not conclude any contractual relationship but with whom we are already in contact. Information provided herein shall apply accordingly also to processing of personal data of other persons which whom our company is in direct contact without having any contractual relationship with them (e.g. legal entities' representatives).