

# PERSONAL DATA PROTECTION POLICY

#### I. GENERAL PROVISIONS

- 1. The controller of personal data as per Article 4(7) of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR) is Suntel s.r.o., Business ID: 25943693, a company with registered office at Nupaky 148, 251 01 ("Controller").
- 2. Controller Contact Information

Address: Nupaky 148, 251 01 E-mail: contact@suntel-group.com Telephone: +420 777 461 111

- 3. Personal data means any and all information relating to an identified or identifiable natural person. An identifiable natural person is a natural person that can be identified, directly or indirectly, particularly by a reference to an identifier, such as a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
- 4. The Controller has not appointed a data protection officer.

# II. SOURCES AND CATEGORIES OF PROCESSED PERSONAL DATA

- 1. The Controller processes personal data You have provided thereto and personal data obtained by the Controller based on Your job application or application for inclusion in a future selection procedure.
- 2. The Controller processes Your identification and contact information and data needed for performing the agreement, processing a job application, or an application for inclusion in a future selection procedure.

#### III. LEGAL BASIS AND PURPOSE OF PERSONAL DATA PROCESSING

- The legal basis for processing personal data includes:
  - performing the agreement between You and the Controller pursuant to Article 6(1)(b) GDPR,
  - Your consent to data processing for a specific purpose, specifically a job application, pursuant to Article 6(1)(a) GDPR.
- 2. The purpose of processing personal data is:
  - processing Your order and exercising rights and discharging duties arising under the contractual arrangement between You and the Controller,
  - processing Your job application or expression of interest to participate in a future selection procedure.
  - the Controller only uses data for the purpose for which such data is thereto disclosed
- 3. The Controller does not carry out automated individual decision-making within the meaning of Article 22 GDPR.

#### IV. DATA STORAGE PERIOD

- The Controller keeps personal data during a period necessary for exercising rights and discharging duties arising under the contractual arrangement between You and the Controller, and for rising claims arising under this contractual arrangement (during a period of 15 years after the termination of the contractual arrangement).
- 2. After the data storage period, the Controller will erase personal data.

### V. RECIPIENTS OF PERSONAL DATA

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- 1. Recipients of personal data include persons:
  - taking part in the delivery of goods, services, or the remittance of payments based on the agreement.



- taking part in a selection procedure or recruitment for a vacant work position,
- securing services supporting the operation of the Controller's website,
- 2. The Controller has no intention to transfer personal data to a third country (a country outside the EU) or to an international organization.

#### VI. YOUR RIGHTS

- 1. Subject to the conditions laid down under GDPR, You have:
  - the right to access your personal data pursuant to Article 15 GDPR,
  - the right to request correction of personal data pursuant to Article 16 GDPR and the right to request restriction in processing pursuant to Article 18 GDPR.
  - the right to request the erasure of Your personal data pursuant to Article 17 GDPR,
  - the right to raise objection to processing pursuant to Article 21 GDPR, and
  - the right to the portability of personal data pursuant to Article 20 GDPR.
  - the right to revoke Your consent to processing in paper or electronic form at the Controller's mailing or e-mail address specified in Article I of this document.
- 2. Furthermore, You have the right to file a complaint with the Office for Personal Data Protection if You believe that Your personal data protection rights have been violated.

#### VII. SECURITY OF PERSONAL DATA

- 1. The Controller declares to have adopted a comprehensive set of appropriate technical and organizational measures to ensure the security of personal data.
- 2. The Controller has adopted technical measures to secure data repositories and repositories in which personal data are kept in paper form.
- 3. The Controller declares that access to personal data is provided solely to thereby authorized persons.

# VIII. COOKIES

- 1. The Controller's website uses cookies to optimize services and the website itself. Cookie is a file saved by a website on the user's device. Cookies do not serve for obtaining personal data; they serve for differentiating individual users who access the website of Suntel Group s.r.o.
- 2. The Controller's website may contain third-party cookies, which serve for compiling anonymous statistics on viewership and the typical comportment of users on the individual pages of the website. As a rule, such third parties do not keep any personal data in connection with the use of cookies.
- 3. The browser settings allow the user to block the use of cookies. Selecting this option, however, will result in the website being displayed incorrectly.

## IX. CLOSING PROVISIONS

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- 1. By sending a message through the contact form, You certify to have acquainted Yourself with and to fully accept the present personal data protection conditions.
- 2. You consent to these conditions by checking off consent via the online form. By granting consent as per the foregoing, You certify to have acquainted Yourself with and to fully accept the present personal data protection conditions.
- 3. The Controller has the right to amend these conditions. Where applicable, a new version of the personal data protection conditions will be posted on the Controller's website and sent to the email address You have provided to the Controller.