

# Information on the processing of personal data

## I. Administrator

1. AtomTrace a.s., with its registered office at Kolejní 3094/9, Královo Pole, 612 00 Brno, IČ: 03396916, kept by the Regional Court in Brno, file no. B 7676 (hereinafter "the administrator") in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (General Data Protection Regulation, hereinafter "GDPR") hereby informs data subjects (hereinafter referred to as "the customer") about the processing of personal data as a personal data administrator. In the event that the customer is a legal entity, this information applies to all natural persons whose personal data the customer provided to the administrator when concluding and fulfilling the contractual relationship between the administrator and the customer. For the purposes of this information, the term customer means any natural person representing the customer.
2. Customers may contact the administrator by e-mail [info@atomtrace.com](mailto:info@atomtrace.com) with questions related to the processing of their personal data.

## II. Basic principles of processing

1. When processing personal data of customers, the administrator shall in particular follow the following principles:
  - the administrator carries out the processing of personal data in an open manner, in compliance with all obligations imposed on him by law,
  - the administrator proceeds fairly and transparently in the processing of personal data in an effort to limit the purposes and scope of the processing of personal data to the minimum necessary,
  - the administrator informs the customers briefly, concisely and without unnecessary information,
  - the administrator shall ensure that the customer does not suffer harm to his rights or property,
  - information on the processing of personal data shall be provided by the administrator to the customer at the latest when the contract or service is provided.

## III. Purpose, scope, time and method of processing

1. The administrator processes the customer's personal data to the following extent:
  - identification data, in particular the name, surname, title, date and place of birth, nationality, permanent address, contact address and telephone number of the customer's representative who is authorized by the customer to communicate with the administrator; distinguishing addendum or other designation, place of business and identification number,
  - contact details, in particular e-mail address, telephone number,
  - other descriptive information (bank details, etc.),
  - data on services provided,
  - information from external sources, in particular publicly available registers, such as the Commercial Register, the Insolvency Register, the Land Register, the Central Register of Enforcement, etc.,
  - records of e-mail or written communication with the customer.
2. The administrator shall process the customer's personal data for the following purposes:
  - **Purchase contract or other similar contract**, the subject of which is the delivery of goods by the administrator - the processing of personal data is necessary for the proper fulfillment of the rights and obligations arising for the administrator from the contractual relationship with the customer (eg

contract preparation, delivery of the agreed goods, billing, etc.). The administrator processes personal data for this purpose for the duration of the contractual relationship.

- **The legitimate interest of the administrator** - processing of personal data is necessary for this purpose (eg resolution of disputes with the customer and protection and enforcement of rights of the administrator, administration and recovery of receivables and statistical purposes), to the same extent as for the purpose of contractual relationship realization. The administrator processes personal data for this purpose for the duration of the contractual relationship and until the expiry of the limitation periods arising from the fulfillment of rights and obligations under the given contractual relationship.

– **Fulfillment of obligations stipulated by legal regulations** - processing of personal data is necessary for this purpose because their processing is required by law or other generally binding legal regulation. Customers' personal data include, in particular, the Energy Act, the Value Added Tax Act and the Accounting Act.

The administrator processes personal data for this purpose to the extent stipulated by the relevant legal regulation. For this purpose, the administrator is entitled to make and keep copies of all documents, documents and other materials provided or communicated by the customer or which arose as a result of the contractual relationship between the administrator and the customer, in accordance with the applicable agreement and its annexes and applicable legal regulations. The administrator processes personal data for this purpose for the period set by the relevant legal regulations.

3. The processing of personal data is necessary for the purposes referred to in paragraph 2 and for these purposes the customer is obliged to provide his / her personal data to the administrator; refusal to provide personal data will result in the non-conclusion of the contract or the impossibility of its performance and consequent termination of obligations under it.
4. The administrator processes the customer's personal data by automated means and manually.

#### **IV. How the administrator gets personal information**

1. The administrator shall obtain personal data:
  - directly from the customer during the negotiation and conclusion of the contract. The collection of personal data from the customer shall also include the collection of such data through the agent's commercial agent or other intermediary, regardless of whether the agent has been authorized to act by the administrator or the customer,
  - from publicly accessible registers, lists and records (Commercial Register, Trade Register, Land Register, etc.) and other public sources,
  - where appropriate, from other subjects, provided that it has given its approval to that subject.

#### **V. Transmission of data to third parties**

1. The administrator shall only transmit the personal data of its customers to the authorities regulating the goods delivered (eg the Czech Trade Inspection Authority, etc.) and, where applicable, to the entities to which the administrator is obliged to disclose personal data under legal regulations.
2. The administrator processes personal data through its own employees as a personal data administrator.
3. The administrator shall not process personal data outside the European Union or provide personal data for processing to persons established outside the European Union.

## **VI. Customer rights**

1. The customer as a data subject has all rights granted by Act No. 101/2000 Coll. and other legal regulations.
2. In particular, the customer has the right to ask the administrator for information on the processing of his personal data for all the above purposes. The administrator shall, without undue delay, communicate to the customer information on the purpose of the processing, personal data or their categories being processed, the recipients or categories of recipients to whom the personal data have been disclosed and information on the nature of the automated processing.
3. A customer who believes that the administrator is processing his / her personal data in violation of the law, according to § 21 of Act No. 101/2000 Coll. the right to ask him for an explanation. Furthermore, the administrator may ask to remove the unlawful state; blocking, correcting, supplementing or destroying personal data, etc.
4. In any case where a customer believes that his or her personal data is being tampered with (especially if the administrator does not respond to his request for information or to remedy the condition, or the customer disagrees with the administrator's statement) authority, which is the Office for personal data protection.