

PRINCIPLES OF PERSONAL DATA PROCESSING

on 17.12.2020

(hereinafter referred to as the „**Principles**“)

1. PURPOSE OF THE PRINCIPLES

1.1. The purpose of these Principles is to satisfy the obligation to inform users (hereinafter referred to as the “Subject”) arising from Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereafter as “GDPR”).

2. TERMS

2.1. For the purposes of these Principles:

2.1.1. **Subject** means a User who is an identified natural person and is thus in the position of a Personal Data Subject in relation to the Provider;

2.1.2. **Service** means a summary of all services provided by the Provider on a website www.workprotector.com (hereinafter also referred to as the “**Website**”). It is essentially the possibility for the User to timestamp uploaded files thanks to which the User will be able to prove that the file uploaded by him/her had the given for at a given time. Moreover, the User may share the timestamped file safely through the Website;

2.1.3. **User** means an identifiable natural person lawfully using the Service of the Provider on the basis of a contractual relationship with the Provider, established by acceptance of Terms of use;

2.1.4. **Personal data** means any information relating to an identified or identifiable natural person, whose Personal data are processed in connection with the provision of the Service by the Provider;

2.1.5. **Controller** means the natural or legal person, public administration office, agency or another subject that decides – on its own or in cooperation with others – on the purposes and means of the processing of personal data. The Provider processes Users' Personal Data. The Provider processes Users' Personal Data necessary for the conclusion and provision of a contractual relationship. The Provider is in the position of Controller towards such Personal Data. The Personal Data, their scope and purpose of processing is defined in these Principles.

3. PROVIDER

3.1. The provider of above-described Service is BEESLI CZ, s.r.o., with its registered office at Blanická 1008/28, Vinohrady, 120 00 Praha 2, the Czech Republic, identification number 242 72 761, registered in the commercial register kept by the City Court in Prague under file C 199469, Company (hereinafter also referred to as the “**Provider**”).

3.2. The Provider shall proceed in accordance with the legal regulations of the European Union and the Czech Republic when collecting, storing and processing the Personal Data of the Subjects collected in connection with the provision of Service;

3.3. The Provider may be contacted by means of info@workprotector.com

4. THE PERSON APPOINTED WITH THE PROTECTION OF PERSONAL DATA

4.1. You have the right to address the person appointed with the protection of personal data by the Provider in matters related to the processing of your Personal data by the Provider and to exercise your rights in the field of Personal data protection.

- 4.2. The person appointed with the protection of personal data can be contacted by means of GDPR@workprotector.com.

5. INFORMATION ON PROCESSING

- 5.1. Categories of mandatory Personal Data processed to use the Service. In connection with the registration for the use of the Service, a certain amount of mandatory Personal Data is processed for the basic identification of the User (name, surname, e-mail) as a part of registration procedure. Other data are provided by the User on their profiles without the request of the Provider.
- 5.2. Categories of Personal data processed for the performance of a contract between the Provider and the User. The Provider processes the following categories of Personal Data necessary for the performance of the contract between the Provider and the User:
- 5.2.1. Users' identification data, in particular, his personal name, surname, phone number;
 - 5.2.2. billing details, in particular, bank details and account number;
 - 5.2.3. data on the Service used by the User and the manner of their use by the User;
 - 5.2.4. data on the history of the User's payments for the Service.
- 5.3. The purpose of the processing of Personal Data obtained from the User. The personal data specified in Art. 5.2 are processed by the Provider to fulfil the contract concluded with the User, providing the Service or for the purpose of billing for the Service. The legal basis for this processing is the performance of concluded contract. Personal data is further used for marketing purposes. In the case of direct marketing, the legal basis for this processing is the legitimate interest of the Provider as direct marketing is in the sense of the GDPR a legitimate interest of the Provider. In some marketing related cases, the Provider asks you for consent; the details are governed by Art. 8.
- 5.4. Period for which the personal data is stored. Personal data is stored by the Provider only for the time necessary for the fulfilment of Provider's obligations under concluded contracts and for the protection of the Provider's legitimate interests in connection with the provision of Service.
- 5.5. Processors. The Provider is entitled to use services of an external company and persons who process Personal data provided by the Subjects or have access to them. These persons are the recipients of Personal Data. The Provider uses services of these processors:
- MailChimp**, part of a The Rocket Science Group, LLC with its registered office at 675 Ponce de Leon Ave NE Suite 5000 Atlanta, GA 30308 United States of America;
 - Close, Inc.**, with its registered office at San Francisco Bay Area, United States of America;
 - Facebook Ireland Ltd.**, with its registered office at 4 Grand Canal Square, Grand Canal Harbour Dublin 2, Ireland;
 - Google Ireland Ltd.**, with its registered office at Gordon House, Barrow Street Dublin 4, Ireland;
 - Hotjar Limited**, a private limited liability company registered under the Laws of Malta with company number C 65490, with its registered office at Level 2, St Julian's Business Centre, 3, Elia Zammit Street, St Julian's STJ 1000, Malta;
 - Smartsupp.com, s.r.o.**, with its registered office at Lidická 2030/20, Černá Pole, 602 00 Brno, the Czech Republic, identification number 036 68 681, registered in the commercial register kept by the Regional Court in Brno under file C 86206;
 - ThePay, s.r.o.**, with its registered office at Masarykovo náměstí 102/65 586 01 Jihlava, identification number 28135261, registered in the commercial register kept by the Regional Court in Brno under file C 88388;
- 5.6. Processing Information about Processors and recipients of Personal data. At the request of the Personal data Subjects sent to an e-mail address GDPR@workprotector.com, the Provider will give more detailed information on the persons involved in the Personal data processing.
- 5.7. Processing in accordance with the provisions of GDPR. All persons involved by the company in the processing of personal data satisfy requirements arising from GDPR. All Controller's employees are

obligated to maintain confidentiality concerning all personal data processed within their work activity for the Controller.

6. SUBJECT'S RIGHTS

6.1. By the virtue of being a personal data Subject, you are entitled to claim the following rights towards the Controller under the conditions and in the extent specified in Chapter III of GDPR by contacting us on an e-mail address GDPR@workprotector.com.

6.2. Subject's rights are as follows:

The right of the data subject to access to personal data: You have the right to get confirmation from the Controller of whether the data concerning your person are being processed. If your Personal data are being processed, you have the right to access such data. Such access includes for example information on the purpose of processing, the category of personal data and information on the source of personal data. You also have the right to request a copy of the processed personal data.

The right to rectification: You have the right to require the Controller to rectify without unnecessary delay any inaccurate personal data with regard to your person that are being processed by the Controller.

The right to erasure: If a ground arises determined by GDPR (e.g. the personal data are not needed for the purposes of processing, or you revoke your consent), you have the right require the Controller to erase without unnecessary delay the personal data with regard to your person. The application of this right is not limitless though. The data is not going to be erased, for example, if such data are processed by virtue of a statutory obligation.

The right to restriction of processing: You have the right to require the Controller to restrict processing of your Personal data in cases determined by GDPR. For example, such cases include a situation when you object with regard to the accuracy of the personal data. The restriction of processing lasts for as long as the Controller is verifying the accuracy of the personal data.

The right to data portability: In certain cases determined by GDPR (e.g. if the processing is based on your consent), you have the right to require the Controller to provide you with your Personal data in a structured, commonly used and machine-readable format. Moreover, you have the right to transfer the data to another controller. You have the right as well to require the Controller to transfer the data to another controller directly if it is technically feasible.

The right to object: You have the right to object to the processing of personal data concerning your person at any time on grounds related to your particular situation if the personal data are processed in the course of a task performed in public interest or within the exercise of official authority or legitimate interests of the Controller or a third party, including profiling, arising from these provisions.

Automated individual decision-making, including profiling: You have the right not to be subject to any decisions arising solely from automated processing, including profiling, that bear a legal effect or have a similar significant impact on you. This right is not applicable in all cases. For example, if a given decision is necessary for concluding or following the contract between you and the Controller.

7. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES AND INTERNATIONAL ORGANIZATIONS

7.1. Transfer of Personal data outside the EU. The Controller is entitled to process your Personal data in cooperation with international organizations and Processors who reside in the so-called third countries, meaning in the territory outside the European Union and thus outside of the European Economic Area. Your Personal data are going to be transferred to MailChimp and Close, companies with registered office in the United States of America. The transfer is based on a Commission Implementing Decision (EU) 2016/1250 of 12 July 2016 pursuant to Directive 95/46 / EC of the

European Parliament and of the Council on the adequate level of protection afforded by the EU-US Privacy Shield.

8. THE RIGHT TO REVOKE CONSENT AT ANY TIME

- 8.1. If processing of your Personal data arises from your consent, you can revoke the consent at any time.
- 8.2. Giving or revoking your consent is your free choice. The Controller is in no position to force you to such conduct or penalize you anyhow with regard to it. Revoking one's consent bears no impact to the legality of processing prior to revoking the consent (i.e. revoking the consent has no retrograde effect).
- 8.3. You can revoke your consent to the processing of personal data by contacting us on an e-mail address GDPR@workprotector.com.

9. COMPLAINTS

- 9.1. You have the right to file a complaint at any time concerning processing of your Personal data with our Data Protection Officer or the person appointed with the protection of personal data, using the contact details as stated in Art. 3.3 or 4.2.
- 9.2. Moreover, you have the right to file a complaint concerning the processing of your Personal data to the Controller's supervisory authority, i.e. the Office for Personal Data Protection, Pplk. Sochora 27, 170 00, Prague 7.

10. TRANSMITTING PERSONAL DATA ON YOUR PART

- 10.1. Charts according to Art. 5. determine the processing in which providing Personal data is obligatory.
- 10.2. If the law requires you to provide your Personal data, you are obligated to disclose the data. The same situation applies if your obligation to provide personal data arises from a contract concluded between you and the Controller. If disclosing personal data is obligatory and no disclosure takes place on your part, consequences determined by the given legislation or contract may apply.

11. COMMERCIAL COMMUNICATION

- 11.1. The Controller is entitled to send you e-mail messages containing commercial communication to the address specified by you in accordance with applicable law. However, this authorization only arises if (i) it has not been rejected by you; or (ii) that you gave a consent to receive commercial communication. You have the option to refuse to receive commercial communication at any time. This option will be listed in each commercial communication.
- 11.2. In the event that you express your explicit consent with the sending of commercial communication relating to other products or services of the Provider, the commercial communication will be sent to you via e-mail address. You have the right to revoke the consent at any time, e.g. by following a procedure specified in an already received business material.

12. COOKIES

- 12.1. Cookies. Some Personal Data are contained in cookies used by the Controller. Detailed information regarding the use of cookies, including the processed Personal data, is provided in a special file available at the Website.

13. APPLICABLE LAW

- 13.1. These principles are governed by directly applicable regulations of the European Union and Czech law.

14. UPDATE OF PRINCIPLES

- 14.1. The Controller is entitled to continuously amend or update these Principles. Any changes to these Principles will take effect upon publication of the updated Principles at the Website. If the

Controller makes such changes to the Principles to be deemed essential and that require the consent of the Subject in accordance with applicable law, the Controller will inform the Subject via e-mail address and, if necessary, request the consent of the Subject.

15. FINAL PROVISIONS

- 15.1. These Principles come into effect on the day of their publishing.