

# Information on personal data processing

Dear ladies and gentlemen,

in accordance with the Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and in accordance with the Data Processing Act No. 110/2019 Coll., please allow us to inform you about the manner in which we in VIG FUND, a.s. (hereinafter the "Company") process your personal data in connection with our Company's activities and performance of contractual obligations.

In this document, we will provide you in particular with information on the types of personal data we collect, on how we use them and for what purpose, to whom we are authorized to provide your personal data, where you can obtain information about your personal data that we process and about your rights in the area of personal data protection.

Please read this information carefully. Should you have any questions, we will be glad to answer them in our offices at Templová 747/5, 110 00, Prague 1, by e-mail using the following e-mail address [info@vigam.cz](mailto:info@vigam.cz), or by phone at 00420956420390.

## 1 Introduction

Our Company processes your personal data for the purpose of negotiating a contract or execution or performance of a contract with you. Without the provision of your personal data, we would not be able to negotiate the contract with you or our business partner whose employee or other contact person you are, execute it or perform our contractual obligations. Furthermore, we process your personal data in order to protect legal claims (in other words, so that our Company could defend its own legal claims in court, out-of-court or enforcement proceedings). In the case that there are video surveillance systems in our premises, we also process your personal data with a view to protecting property and persons through video surveillance systems that monitor these premises. We perform all such processing directly based on the applicable legal regulations.

## 2 Information on personal data controller

The controller of your personal data is: VIG FUND, a.s., with its registered office at Templová 747/5, Staré Město, 110 00 Prague 1, Id. No.: 24220809, registered in the Commercial Register kept by the Municipal Court in Prague under File No. B 17896.

## 3 Principles of personal data processing

We comply with the following principles of personal data processing:

- we process your personal data fairly and in a transparent manner;
- we collect your personal data for specific, explicit and legitimate purposes;
- we process only adequate and relevant personal data and the processing is limited to what is necessary in relation to the purposes for which they are processed;
- we process only accurate personal data and take measures necessary for the deletion or rectification of inaccurate personal data;
- we store your personal data in a form enabling your identification only for the period of time necessary for the purposes for which personal data are processed;

- we process your personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

## **4 Legal basis for processing and purposes of personal data processing**

### 1) Personal data processing without your consent

We process your personal data mainly for the purpose of being able to enter into a contractual relationship with you or our business partner whose employee or other contact person you are and to perform the ensuing obligations. We may process your personal data without your consent as such processing is necessary:

- For the purpose of negotiating a contract or execution or performance of a contract provided that we conclude the contract directly with you. This includes, in particular, purchase contracts, lease contracts, agreements on mortgage or pledge, contracts for work, consultancy services agreements, contracts of mandate, innominate agreements, other agreements concerning the provision of services or use of property, including securing of obligations following from the contracts. In these cases, the provision of your personal data is our contractual requirement as it is not possible to conclude the contract or perform ensuing obligations without it.
- To perform our legal duties, in particular for accounting and tax purposes or fulfilment of archiving obligations.
- For the purposes of legitimate interests of our Company. These include, in particular, enforcement of receivables, resolving disputed matters (court and other disputes), protection of persons and property (video surveillance systems) or conclusion and performance of a contract provided that we conclude such a contract with our business partner whose employee or other contact person you are.

## **5 Extent of processed personal data**

We process your personal data to the extent necessary for attaining the above-specified purposes. We process in particular your:

- identification details (e.g. name, surname, date of birth, Id. No. and Tax Id. No.);
- contact details (e.g. contact addresses, e-mail addresses, telephone numbers);
- data following from the performance of obligations under the contracts (e.g. contract number, amount of your obligations, bank account number and payment details).

## **6 Sources of personal data**

Personal data we process about you originate from the following sources:

- you provided us with the data particularly in connection with the conclusion and performance of the contract;
- we acquired the data from our business partner whose employee or other contact person you are; or
- the data originate from by its purpose compatible public sources, lists and evidences, e. g. the Commercial Register and the Trade Register.

## **7 Manner of personal data processing**

We process personal data manually in our Company's information systems. Your personal data are processed by our employees and may also be processed by third parties to the necessary extent. Prior to the transfer of personal

data to third parties, we enter into a written agreement with them, which binds them by the same obligations concerning personal data processing that our Company is bound by.

## **8 Recipients of personal data**

Your personal data may be disclosed to third parties such as companies providing us accountancy and tax services, property and asset management, facility management, reception or security and monitoring services. If such third parties participate in the processing of personal data, we enter into a written agreement with them, which binds them by the same obligations concerning personal data processing that our Company is bound by. Your personal data may be also disclosed to other subjects in cases, when we are obliged to do so or when it is necessary for the purposes of our legitimate interests (such as courts, police etc.) Your personal data may be stored on third-party servers, including, but not limited to, servers of webhosting or cloud services providers.

## **9 Period of storage of personal data**

We process the personal data only for the period necessary for the purposes of their processing. We regularly evaluate whether it is still necessary to process your personal data for the given purpose. If your personal data are no longer necessary for any of the purposes of the processing, we destroy them. We process your personal data for the following individual purposes:

- we process personal data necessary for the execution and performance of the contract during the negotiations on the contract and the term of the contractual relationship; after that, personal data may usually be used for the limitation period for any of any related claims and for 1 further year in case that any your claim or claim of our business partner whose employee or other contact person you are shall be made at court at the end of a limitation period without our company being notified about it.;
- we process personal data necessary for the purposes of enforcement of receivables and resolving disputed matters during the term of the litigation;
- we process personal data necessary for accounting and tax purposes for the period stipulated by legal regulations;
- in order to comply with our archiving duties, we process the personal data for the archiving period stipulated by the legal regulations;
- we process personal data necessary for the protection of persons and property (video surveillance systems) for the period of 72 hours.

## **10 Your rights**

### **a) Right of access to personal data**

You have the right to request confirmation from us whether our Company processes your personal data. If our Company processes your personal data, you have the right to have access to such personal data, the right to obtain information on the purpose of processing of the personal data, personal data categories, recipients of personal data to whom the personal data were disclosed, the period of storage of the personal data or the criteria for determining this period, information on the right to request rectification or erasure of personal data, restriction of their processing, possibility to object to the processing and the right to file a complaint with a supervisory authority. We shall provide you a copy of your personal data on your request.

## **b) Right to rectification of personal data**

If your personal data that we process are inaccurate, you are entitled to request that our Company rectify them without undue delay.

## **c) Right to erasure**

You have the right to request that our Company delete your personal data that we process without undue delay if:

- the data are no longer necessary for the purposes for which they were collected or processed;
- you withdraw your consent to personal data processing and no other legal grounds for processing your personal data exist;
- personal data are processed for the purposes of legitimate interests of our Company or a third party and you have raised an objection against personal data processing and no overriding legitimate grounds for processing exist;
- the personal data have been processed unlawfully;
- personal data must be erased to fulfil the legal obligation stipulated by the laws of the EU or the Czech Republic.

However, you do not have the right to request erasure of personal data if the processing of personal data by our Company is necessary:

- for exercising the right of freedom of expression and information;
- to fulfil the legal obligation stipulated by the laws of the EU or the Czech Republic (e.g. the duty to deposit accounting records);
- for reasons of public interest in the area of public health;
- for archiving purposes in public interest;
- for the establishment, exercise or defense of legal claims by our Company.

## **d) Right to restriction of processing**

You have the right to request that we restrict the processing of personal data concerning you if:

- you request rectification of your personal data; the processing shall be restricted for the period during which we verify the accuracy of your personal data;
- we process your personal data at variance with the legal regulations, but, at the same time, you refuse the erasure of the personal data and only request that the personal data processing be restricted;
- we do not need the personal data for the set purposes of processing any more, but, at the same time, you need the data for the establishment, exercise or defence of legal claims;
- personal data are processed for the purposes of legitimate interests of our Company or a third party and you have raised an objection against personal data processing; the processing shall be restricted until we establish whether we will act on your request.

## **e) Right to data portability**

If personal data processing is based on your consent or if the data are processed on the basis of execution and performance of a contract with you, you have the right to obtain from our Company your personal data that you provided to us in a structured, commonly used and machine-readable format, and the right to submit these data to another controller. This right may be exercised in addition to the right to erasure of personal data.

#### **f) Right to object**

If we process your personal data for the purposes of legitimate interests of our Company or a third party, you have the right to raise an objection, on grounds relating your particular situation, against personal data processing at any time. If you raise such an objection, our Company may no longer process the personal data unless compelling legitimate grounds exist that override your interests or rights and freedoms or unless we need the personal data for the establishment, exercise or defence of legal claims.

#### **g) Right to withdraw consent**

If the personal data processing is based on your consent, you have the right to revoke your consent to personal data processing at any time with ex nunc effects. Withdrawal of the consent or if you will not consent shall not have any negative consequences for you. If no legal grounds for personal data processing exist, we may not further process your personal data.

#### **h) Right to lodge a complaint**

If you believe that your personal data are processed at variance with the legal regulations, you have the right to file a complaint with the Office for Personal Data Protection, which is authorized to assess whether we process your data in accordance with the legal regulations.

#### **Manner of exercising your rights**

Your rights set out in paragraphs (a) to (g) above may be exercised *vis-à-vis* our Company in writing at Templová 747/5, 110 00, Prague 1, by e-mail sent to [info@vigam.cz](mailto:info@vigam.cz), or by phone at 00420956420390.

You have been hereby informed of your rights and its protection pursuant to Art. 13 – 22 Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data (GDPR).