

## **Data Protection Policy**

### **Summary**

This Data Protection Policy ("**Data Protection Policy**") stipulates the rules for personal data protection in the company V Team Prague, s.r.o., corporate ID: 062 15 998, with its registered office at Vladislavova 1390/17, 110 00 Prague 1, Czech Republic ("**the company V Team**"). The Data Protection Policy reflects the data privacy rules required by the GDPR and other Member States' national data privacy legislation.

The company V Team takes personal data protection seriously and handles the personal data with sufficient carefulness and responsibility when performing the business activities. A personal data breach may result in serious legal and economic consequences for the company V Team, the employees and data subjects. It may also cause damage to the company V Team reputation. Through the implementation of the Data Protection Policy across the company V Team, the risks of, and arising from, breaching data protection will be minimised.

### **Applicability**

This Data Protection Policy is binding for the company V Team and the employees. It relates to all personal data processing to which the GDPR and the Member States' national legislation apply.

### **1. Procedure and Competencies**

The following articles describe the procedures followed by the company V Team when processing the personal data. Furthermore, they provide a brief description of the split of the competencies and key roles in the company V Team in the area of personal data processing.

#### **1.1 General Obligation**

The company V Team has taken and shall continue to take appropriate technical and organisational measures in order to ensure the protection of the personal data against misuse, loss and damage, and to treat them in accordance with the GDPR and the Member States' national legislation in the area of data privacy. The data protection applies to the processing of the personal data of the company V Team partners, employees, their family members, job applicants, customers and other individuals whose personal data are processed by the company V Team.

#### **1.2 Basic Principles of Personal Data Protection**

The company V Team respects the basic principles stipulated by the GDPR in processing the personal data. The respective basic principles are listed below:

- Lawfulness principle – at least one lawful basis has to be determined prior to processing the personal data;
- Principle of limitation by purpose – process the personal data only for pre-defined purposes;

- Data minimisation principle – processing of only necessary, relevant and adequate personal data for any legitimate purpose;
- Correctness and transparency principle – open and transparent processing to the data subjects;
- Integrity and confidentiality principle, application of the “need to know” principle – implementation of necessary organisational and technical measures in order to ensure the restriction of access to the personal data to prevent an unauthorised or unlawful processing;
- Accuracy principle – processing of accurate and up-to-date personal data;
- Controlled change management;
- Definition of roles participating in the personal data protection in the company V Team.

### **1.3 Lawful Bases and Personal Data Processing Purposes**

The personal data processing is always based on the lawful bases, which include the consent to the personal data processing, compliance with a legal obligation, the performance of a contract, the legitimate interest, the public interest or the protection of the interests of the data subject.

### **1.4 Processing of Special Categories of Personal Data and Personal Data Relating to Criminal Issues**

Special categories of personal data and personal data relating to criminal issues are especially sensitive and therefore a high degree of protection is applied.

### **1.5 Personal Data Transfer**

The company V Team may only make personal data available to third parties (including a personal data transfer within the group) under certain conditions. Personal data may only be available to a third party acting as a processor based on a personal data processing agreement. Personal data may also be available to another third-party acting as a controller or a joint-controller based on relevant contractual agreements.

In case there are requirements for rectification or erasure of the personal data or for processing restrictions, under certain circumstances, the company V Team notifies the relevant third parties to which the personal data were made available, unless this is not feasible or requires an inadequate effort. The company V Team informs a data subject on the third parties to which the concerned personal data were disclosed, only if required to do so by the data subject.

Under certain conditions, the company V Team can also transfer personal data to third countries outside the EEA or the European Union or to the international organisations.

### **1.6 Rights of Data Subjects**

The company V Team takes all necessary steps to execute the rights of the data subjects stipulated by the GDPR. In respect of the personal data processing, data subjects have the rights comprising the right of access to personal data, the right to rectification, processing restriction, portability or erasure of personal data, the right to object to the personal data processing and the right not to be a subject

to a decision based exclusively on the automated personal data processing.

The data subjects can request the exercise of their rights via a written or oral request. In order to provide the sufficient protection of the personal data processed by the company V Team and to prevent personal data misuse from taking place, the company V Team has introduced rules for the verification of the identity of the data subjects stated below.

### **Written request**

To request the exercise of the particular right in writing, the data subjects shall fill in the request form attached to this Data Protection Policy. The data subjects' signatures on the requests forms need to be officially certified. Depending on local law, data subjects may be able to have their signature certified e.g. at a notary office, post office, attorney-at-law, consulate or municipal/regional authority. The signature has to be officially certified in a country where the request is submitted, sent via mail using a postal services provider or verified electronical means (e.g. data boxes in Czechia). Particularly when sending the request via mail using a postal service provider in the countries outside of the EEA or the European Union, data subjects may be contacted by the company V Team in order to further verify the identity.

### **Oral request**

Data subjects may also request the exercise of their particular right in person at the company V team's registered seat. Their identity will be verified by the particular designated employee (e.g. at a front desk), based on the submission of one of the following documents: personal ID card, passport or other official document with a photo sufficiently eligible to enable your clear identification.

The exercise of data subjects' rights shall not affect the rights of the third parties. Should the requests submitted by data subjects be manifestly unfounded or excessive, in particular because of the repetitive character, the company V Team may require a reasonable fee, not exceeding the necessary costs of the provision of the above stated information or arranging the exercising of the data subjects' rights, for the purposes of responding to their request.

The company V Team ensures sufficient communication and cooperation in order to process all received requests in adequate time. The company V Team closely cooperates to provide the concerned data subject with a response within the statutory periods.

## **1.7 Roles and Responsibilities**

The company V Team and the statutory bodies are responsible for ensuring compliance with the GDPR and the relevant Member States' national data privacy legislation.

### **1.8 Responsibilities of Data Owners and of All Employees**

All data owners within the company V Team and all employees are obliged to process the personal data in compliance with the company V Team's internal policies, the GDPR and other Member States' national data privacy legislation.

### **1.9 Notification of a Personal Data Breach**

If the breach of personal data meets the requirements for reporting to the respective supervisory authority and/or data subjects, the company V Team fulfils this obligation within 72 hours from the personal data breach.

### **1.10 Personal Data Erasure**

The company V Team processes personal data only for a necessary time. Personal data are erased or anonymised under the following circumstances:

- Expiration of the purpose of the personal data processing without any other legitimate purpose for replacement;
  - Personal data are not further needed for the purpose for which they were processed;
  - Withdrawal of the data subject's consent without any other lawful basis for processing;
  - Objection of the data subject against the processing without any other prevailing justified reasons;
- and
- Unlawful processing of the personal data.

The company V Team puts an emphasis on observing the necessary security measures during erasure or anonymization.

### **1.11 Personal Data Publishing in Public Media and the Intranet**

The company V Team may publish personal data in the Intranet, the Internet or any other media only with a consent of the concerned data subject, unless there is another legal basis in specific cases.

### **1.12 Information on Personal Data Processing**

In case that the company V Team obtains personal data relating to data subjects directly from these data subjects, these data subjects are provided with information on the processing of their personal data at the time of obtaining such personal data. If personal data are not obtained directly from the data subjects, processing information is provided to them subsequently, mostly in the first communication with the subject.

## **2. Basic Terms/Abbreviations**

Data subject                      An identified or identifiable individual whose personal data are processed; an identifiable individual is an individual who can be identified either directly or indirectly, predominantly with reference to a certain identifier, such as a name,

identification number, location data, online identifier or one or more special elements of the physical, physiological, genetic, psychical, economic, cultural or social identity of the individual.

Data controller	A natural or legal person, public authority, agency or another body which, alone or jointly with others, determines the purposes and means of personal data processing.
Processor	A natural or legal person, public authority, agency or another body which processes personal data on behalf of the controller.
Personal data	Any information on the identified or identifiable individual.
Special category	Personal data providing information on racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership and the processing of genetic data, biometric data for the purposes of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
GDPR	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 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 (General Data Protection Regulation).
Personal data processing	Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Anonymised information	Information not relating to an identified or identifiable individual, including personal data anonymised so that the data subject is not or ceased to be identifiable.
Third party	Any legal entity or individual who is not the Company's employee, except for data subjects.
Consent	Any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.



## Notes

- Please fill this form in a readable manner.
- Incorrect, non-readable or incomplete data could cause incorrect processing or dismissal of this request.
- In order to process this request a data subject shall be clearly identified by one of the following means:
  - Verification of signature in case of written request submitted by post,
  - Identification by data subjects identification document in case of physically submitted request,
  - verified electronical means (e.g. data boxes in Czechia) being sent by data subject.
- Request can be sent by postal service to the registered office of the entity being addressed by the request or physically submitted to at the registered offices within standard business hours.
- The request shall be always marked „**GDPR Request**“ (for example on an envelope), otherwise processing can be prolonged.
- In case of representation of a data subject, please provide a document based on which you represent data subject (proxy, power of attorney).
- Email is not mandatory and eases the processing of this request.

In case of any questions in relation to the GDPR requests kindly contact us by email address [mail@vteam.cz](mailto:mail@vteam.cz). Please be reminded that email communication is not 100% safe mean of communication and its safety, source or delivery is not guaranteed.