

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF EMPLOYEES, EXTERNAL COLLABORATORS, CUSTOMERS AND BUSINESS PARTNERS OF DIVELIT system s.r.o.

DIVELIT system s.r.o., company ID: 05705894, with registered office at V Křovinách 314/21, Povel, 779 00 Olomouc (hereinafter referred to as "DIVELIT") and (hereinafter referred to as "We"), as the controller of personal data, informs you as a user of the website www.divelit.cz about the collection of personal data and privacy policy described below.

Regulation (EU) No 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, on the free movement of such data and on the repeal of Directive 95/46/EC (General Data Protection Regulation) entered into force on 25 May 2018.

By providing this information, we want to make the employees of the company, its external collaborators, customers and business partners (suppliers, subcontractors) and other natural or legal persons with whom our company maintains contact without having a contractual relationship with them, generally aware, what personal data we collect about them, how we handle it, from what sources we obtain it, for what purpose we use it, to whom we may disclose it, from whom they can obtain further information about the personal data we process about them, and what their individual rights in the area of data protection are.

PERSONAL DATA PROCESSING POLICY

1. DIVELIT (hereinafter referred to as the "Company") processes personal data for a clear and comprehensible reason, by specified means and in a manner that ensures the achievement of the purpose of processing, personal data is stored only for the time necessary.
2. When processing personal data, we ensure adequate security against unauthorised or accidental access to, alteration, destruction or loss of personal data, unauthorised transfer or processing, as well as against misuse.
3. We clearly inform all affected persons about the processing of personal data and their rights to accurate and complete information regarding the processing of personal data.
4. We have adopted and comply with appropriate organisational and technical measures, internal standards and procedures to ensure the necessary level of security appropriate to the anticipated risks. All persons who come into contact with personal data are obliged to maintain the confidentiality of information obtained in connection with the processing of such data.

MANAGEMENT AND PROCESSING OF PERSONAL DATA

1. The controller of personal data is DIVELIT system s.r.o., ID No.: 05705894, with its registered office at V Křovinách 314/21, Povel, 779 00 Olomouc, registered in the Commercial Register kept at the Regional Court in Ostrava, file number C 68955 (hereinafter referred to as "the company").
2. In certain cases, the company also handles the personal data of the persons concerned on behalf of another person (another administrator). For example, this is the case of cooperation with other companies from the DIVELIT system group (hereinafter referred to as the "DIVELIT group"); a list of entities belonging to the DIVELIT system group is provided in Annex 1 to this information and will be updated as necessary.

THE PURPOSE AND LEGAL TITLE OF THE PROCESSING

All personal data is processed in a lawful and transparent manner and only adequate, relevant and necessary data is required in relation to the purpose of the processing.

1. Without the consent of the person concerned in the interest of:

- a) preventing damage to the property of the persons concerned entrusted to the company and to the company's property
- b) to comply with reporting obligations to public authorities
- c) to comply with obligations arising from the execution of a decision of a court and/or public authorities
- d) fulfilling obligations imposed on the company in direct connection with the services it is entitled to provide to business partners, in particular on the basis of Act No. 480/2004 Coll. on certain information society services, as amended and in force
- e) compliance with archiving obligations
- f) negotiating rights and obligations and implementing rights and obligations arising from concluded contracts and agreements, in particular the implementation of rights and obligations arising from established or concluded employment and similar relationships with job applicants or employees and from established or concluded business relationships with potential customers or clients. In such cases, personal data is necessary, inter alia, to enable the contractual relationship to be negotiated, concluded and implemented without undue legal risks, including negotiations for its conclusion or negotiations for its modification
- g) the protection of rights and legally protected interests, in particular in the interest of:
 - i. the protection of the rights and legally protected interests of the company, the beneficiaries or other persons entitled to claim, e.g. in proving claims that the company is obliged to make against third parties in the course of the enforcement of claims, the realisation of collateral or other claims or the development and evolution of the services provided
 - ii. the execution of negotiations for the assignment of rights and obligations, including the related execution and other follow-up negotiations with third parties, etc.
 - iii. the management of all litigation, in particular for the purposes of litigation or other disputes (e.g. to meet the burden of proof)

2. With the consent of the person concerned

- a) This is generally the case where the data subject voluntarily consents to the company processing the personal data provided or otherwise obtained by the data subject. If the data subject does not provide consent, the company may not be able to provide the services, products or programmes or may have to reasonably adjust the availability, scope or terms of the services, products or programmes provided. Based on the consent of the person concerned, the Company processes the personal data of the person concerned for the purposes set out below:
 - i. taking care of employees (job applicants, former employees) or customers (potential customers, former customers) in the context of activities which do not constitute the performance of an employment, commercial or other contract or rely on any other legal framework for processing personal data and which include the following activities: market research, maintaining courtesy, relationship and communication

SCOPE AND MANNER OF PROCESSING OF PERSONAL DATA

The Company processes personal data to the extent necessary to fulfil the above purposes. In particular, it processes contact and identification data, data indicating creditworthiness, trustworthiness and payment record, descriptive and other data and, to the extent necessary and justified, data on other persons, generally available from public sources. Further information on the scope of the personal data of clients processed is provided **in Annex 2 to this information.**

The way in which the Company processes personal data includes manual and automated processing, including algorithmic processing, in the Company's information systems. Personal data is predominantly processed by the Company's employees. To the extent necessary, also third parties to whom the processing of personal data has been entrusted on the basis of a specific written agreement concluded before any transfer of personal data to such third party. This special contract shall contain the same safeguards for the processing of personal data as the company itself observes in accordance with its legal obligations.

RECIPIENTS OF PERSONAL DATA

The personal data of the persons concerned (employees, job applicants, former employees) or customers (potential customers, former customers) or business partners (potential or former business partners) are disclosed to the extent necessary, in particular to the company's professional employees in connection with the performance of their work duties, in which the personal data must be handled. It goes without saying that all security measures must be observed. In addition, the personal data of the persons concerned are transferred to third parties who are involved in the processing of the personal data of the persons concerned on the basis of a specific written agreement or to whom the personal data are made available for another reason in accordance with the law.

In accordance with the relevant legislation, the company is entitled or directly, without the consent of the person concerned, obliged to transfer personal data:

- a) to the relevant public authorities, courts and law enforcement authorities for the purpose of fulfilling their legal obligations and for the purpose of enforcing decisions
- b) to other persons to the extent provided for by law, for example, to third parties for the purpose of recovering claims of the company against the persons concerned

With the consent of the person concerned, on the basis of which the company is entitled to handle information representing confidential information, trade secrets, banking secrets and other information classified on the basis of Act No. 412/2005 Coll., on the protection of classified information and security clearance, we pass on personal data:

- a) Entities belonging to the DIVELIT system group, persons with property links to the company, for the purposes of compliance with the company's legal obligations, conclusion and performance of contracts, offering products and services, protection of the company's rights and legally protected interests, customer care and mutual information within the DIVELIT system group on matters that are indicative of the creditworthiness and credibility of customers.
- b) Entities belonging to a group of persons linked by property to the company's customer, if this is agreed in a written commercial agreement with the company's customer.
- c) To other persons for the purpose of disseminating information, offering the Company's products and services, such transmission will be carried out by the Company, if the consent of the person concerned is granted, in full compliance with the other conditions set out in this information, in particular in relation to the purposes, scope and duration of the processing of personal data. In this case, the Company will only transfer identification and contact data to the extent necessary for the recipient concerned.

TRANSFER OF PERSONAL DATA ABROAD

The personal data of the persons concerned are processed in the Czech Republic and in other EU countries where entities belonging to the DIVELIT system group and sharing the same standards of personal data protection as the company are based. Neither the Company nor the entities involved in processing the personal data of the data subjects transfer the personal data of the data subjects to countries outside the European Union.

PROCESSING TIME OF PERSONAL DATA

The Company processes the personal data of the persons concerned only for the period of time strictly necessary with regard to the purposes of processing, unless the processing period is imposed by law. The responsible persons in charge of the company assess on an ongoing basis whether the need to process certain personal data necessary for a particular purpose continues. If the company determines that it is no longer necessary for any of the purposes for which it was processed, it shall destroy the data. The need to process the relevant personal data for a given purpose after the normal period of usefulness has expired is carefully assessed by the company and the period of usefulness is evaluated on the basis of the purpose of the processing.

THE RIGHT OF THE PERSON CONCERNED TO WITHDRAW CONSENT

In this notice, the company explains why it needs the personal data of the data subjects and that it may only process them for certain purposes with their consent. The data subject is not obliged to give his or her consent to the processing of his or her personal data and is entitled to withdraw the consent given at any time. If the data subject withdraws his or her consent, the company shall cease processing the personal data concerned for the purposes requiring the relevant consent, but may be entitled or even obliged to continue to process the same personal data for other purposes on the basis of the relevant legal title.

If the person concerned does not give or withdraws his or her consent, the company may:

- a) modify the availability, scope or terms of its products or services accordingly
- b) refuse to provide the person concerned with its products or services if it finds that such consent is necessary to provide the product or service under the circumstances

If the person concerned wishes to withdraw his or her consent to the processing of personal data, he or she may contact us in writing at DIVELIT system s.r.o., V Křovinách 314/21, Povel, 779 00 Olomouc, and by e-mail at info@divelit.cz

SOURCES OF PERSONAL DATA

The personal data of the persons concerned are obtained by the company mainly from:

- a) from the affected persons themselves, either directly, e.g. when providing documents for negotiations and concluding contracts relating to labour relations or the products or services provided, or indirectly, e.g. when the affected persons use the products or services themselves or when making information about the products and services available to the affected persons, e.g. via the company's website, etc.
- b) from publicly available sources (public registers, records or lists)
- c) from third parties authorised to handle the personal data of the person concerned and to transfer them to the company, subject to compliance with specified conditions, for example from members of the DIVELIT system group
- d) from prospective customers and the company's services or products in the context of marketing actions and campaigns
- e) from its own activities, by processing and evaluating other personal data of the persons concerned

YOUR RIGHTS ARISING FROM THE PROCESSING OF PERSONAL DATA

You have the following rights in relation to our processing of your personal data:

- a) the right to access your personal data
- b) the right to rectification
- c) the right to erasure ("right to be forgotten")
- d) the right to restriction of data processing
- e) the right to object to processing
- f) the right to lodge a complaint about the processing of personal data

Your rights are explained below to give you a clearer idea of their content.

You can exercise all your rights by contacting us at info@divelit.cz

You can lodge a complaint with the supervisory authority, which is the Data Protection Authority (www.uoou.cz).

The right of access means that you can ask us at any time to confirm whether or not the personal data concerning you are being processed and, if so, for what purposes, to what extent, to whom they are disclosed, how long we will process them, whether you have the right to rectification, erasure, restriction of processing or to object, where we obtained the personal data and whether or not automated decision-making, including possible profiling, is taking place on the basis of the processing of your personal data. You also have the right to obtain a copy of your personal data, the first provision of which is free of charge, and for further provision the Intermediary may require reasonable payment of administrative costs.

The right to rectification means that you can ask us to correct or complete your personal data at any time if it is inaccurate or incomplete. The right to erasure means that we must erase your personal data if:

- they are no longer necessary for the purposes for which they were collected or otherwise processed
- the processing is unlawful
- you object to the processing and there are no overriding legitimate grounds for the processing, or we are under a legal obligation to do so.

The right to restrict processing means that until we have resolved any disputed issues regarding the processing of your personal data, we must restrict the processing of your personal data so that we can only store it and, where appropriate, use it to establish, exercise or defend legal claims.

Right to object means that you can object to us processing your personal data that we process for direct marketing purposes or on the grounds of legitimate interest. If you object to processing for direct marketing purposes, your personal data will no longer be processed for these purposes.

ELECTRONIC MEANS OF COMMUNICATION AND MOBILE APPLICATIONS

As part of its care for all affected persons, the Company develops its technology to enable affected persons to use its products, services and programs in an appropriate manner using modern electronic means of communication. This includes, in particular, services related to the use of the Internet, the use of social networks and various online applications. Any personal data collected about the persons concerned in this context is processed by the company in accordance with the terms and conditions and principles set out in this information.

When communicating commercially via websites and social networks, the company also uses cookies – small text files that are stored on the computer of the person concerned when the website is first accessed. Further information on the use of cookies is available on the Company's website www.divelit.cz

This information shall enter into force and effect on 13 November 2020.

The Annexes form an integral part of this information:

Annex 1: DIVELIT system group

Annex 2: Scope of personal data processed



ANNEX 1 – DIVELIT GROUP

As of 19 April 2024, the DIVELIT Group consists of the following entities:

DIVELIT system s.r.o.

Registered office: V Křovinách 314/21, Povel, 779 00 Olomouc
Identification number: 05705894
File number: C 68955, registered at the Regional Court in Ostrava

DIVELIT Control s.r.o.

Registered office: U Vodárny 2965/2, Královo Pole, 616 00 Brno
Identification number: 17203198
File No.: C 129074 filed with the Regional Court in Brno

HealthTech Intelligence s.r.o.

Registered office: Příkop 843/4, Zábřdovice, 602 00 Brno
Identification number: 19410581
File No.: C 134467 filed with the Regional Court in Brno



ANNEX 2 – SCOPE OF PROCESSED PERSONAL DATA

IDENTIFICATION DATA

This includes data, which are mainly name, surname, date and place of birth, birth number, permanent address, type, number and validity of the identity card; in the case of a natural person - entrepreneur, also ID number and VAT number. Other possible identification data include, for example, the IP address of the PC used, the bank connection and account number, and sets of specific authentication data, the use of which the company agrees with the person concerned.

CONTACT DETAILS

Contact addresses, telephone numbers, e-mail addresses, fax addresses or other similar contact data.

DATA NECESSARY FOR THE DECISION TO CONCLUDE THE CONTRACT

This is the data necessary in particular to assess the riskiness of the contractual relationship or transaction. Depending on the type of contract being concluded, these data include, but are not limited to, data on integrity, medical fitness, possible execution, insolvency proceedings, entry into liquidation, data on business connections.

DATA ARISING FROM THE PERFORMANCE OF CONTRACTUAL OBLIGATIONS

Depending on the nature of the product or service provided, we process data relating to the product or service provided. This category includes the processing of personal data such as the duration of the contract, the payment period, the status of the company's obligations to the person concerned, the status of the company's receivables from the person concerned, data on payment transactions made with the person concerned, data on the use of payment means in relation to the person concerned.

PERSONAL DATA

Obtained in connection with the provision of our products or services.