

## PRIVACY NOTICE

### INTRODUCTION

We would like to provide you with intelligible and transparent information about how we process your personal data and what your rights are in this regard. Therefore, we provide you with all the essential information in a clear manner below.

We process and protect your personal data in full compliance with 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 – “**GDPR**”), and with Act No. 110/2019 Coll., on the processing of personal data. When processing your personal data, we always adhere to the following basic principles:

- we process your personal data lawfully, fairly and in a transparent manner;
- we collect your personal data for specified, explicit and legitimate purposes and we do not process it in a manner that is incompatible with those purposes;
- we only process your personal data that is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- we only process your accurate and, where necessary, kept up to date personal data;
- we keep your personal data in a form which permits your identification for no longer than is necessary for the purposes for which they are processed;
- we process your personal data in a manner that ensures its appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

### CONTROLLER

The controller of your personal data shall be **BRM AERO, s.r.o.**, company ID No.: 291 90 924, registered office Letecká č.ev. 255, 686 04 Kunovice, Czech Republic, registered in the Commercial Register kept at the Regional Court in Brno under file No. C 64441 (“**Controller**”). The Controller is responsible for processing your personal data and you can invoke most of your rights listed below against the Controller.

The Controller has not appointed a data protection officer, but has designated a employee responsible for personal data protection area.

If you have any questions regarding the processing of your personal data or if you wish to exercise your rights, you can contact the Controller in one of the following ways:

- by electronic mail sent to the e-mail address: **zuzana.dankova@bristell.com**;
- by telephone at the following number: **+420 774 442 303**;
- by post sent to the address: **BRM AERO, s.r.o., Letecká č.ev. 255, 686 04 Kunovice, Czech Republic** or
- by message sent to the Controller's data box with the data box identifier: **398guwd**.

### WHAT CATEGORIES OF PERSONAL DATA DO WE PROCESS AND WHO ARE THE DATA SUBJECTS?

We only process personal data that we absolutely need in order to comply with our legal obligations, properly fulfill our contractual obligations and protect our legitimate interests, or if we have your

consent to process it. For these reasons, we process the personal data of the following persons in particular:

- our customers and, where applicable, their representatives or employees;
- our distributors (dealers) and, where applicable, their representatives or employees;
- our business partners and, where applicable, their representatives or employees;
- subscribers to our newsletter;
- people who contact us via the online form;
- our employees and job applicants;
- whistleblowers.

Regardless of which of the above groups you belong to, we always process your personal data only to the extent that we need it for the given purpose of processing. In most cases, this only concerns your identification and contact details.

### **FOR WHAT PURPOSES DO WE NEED YOUR PERSONAL DATA?**

We determine the purposes of processing your personal data primarily based on the nature of the contractual or other relationship with you, or based on the services provided to you or our legitimate interests.

You will always be informed in detail about the specific purposes of processing your personal data through the relevant privacy notice that we provide to you at the time of obtaining your personal data.

### **ON WHAT LEGAL BASIS DO WE PROCESS YOUR PERSONAL DATA?**

We always process your personal data on the basis of at least one legal reason (title). If this were not the case, we would not be acting in accordance with the principle of lawfulness as one of the most important principles of the GDPR.

The processing of your personal data is based on the following legal bases:

- fulfilling a legal obligation that applies to us;
- fulfilling a contractual obligation entered into with you (or your employer);
- the existence of our legitimate interest;
- your consent to the processing of personal data.

Information about the specific purpose of processing based on specific legal basis can also be found in the relevant privacy notice that we provide to you at the time of obtaining your personal data.

### **HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

We only store your personal data for as long as is necessary for the purpose of processing. If the processing of your personal data is required by law, the law usually also specifies the period for which we are required to do so. If we process your personal data in order to be able to fulfill a contract concluded with you, it is necessary to process your personal data for the entire duration of the contract. If the processing of your personal data is necessary for the purposes of our legitimate interest, we only process it for as long as our legitimate interest lasts. If you give us your consent to process your personal data, we process your personal data for the duration of this consent or until it is withdrawn.

## **WHO DO WE GET YOUR PERSONAL DATA FROM?**

We obtain your personal data primarily directly from you or in connection with our contractual relationship. This gives you control over what personal data you provide to us and what you do not. However, we need some of your personal data in order to comply with applicable legal regulations or to conclude a contract with you. We will always notify you of what personal data you are required to provide to us and what the consequences of not providing this data may be.

We may also obtain some of your personal data from public sources, such as public registers. In certain cases, we also obtain your personal data from other controllers, but we are obliged to inform you of this.

## **WHO DO WE SHARE YOUR PERSONAL DATA WITH?**

Your personal data is available to our employees who need it for their work. Your personal data will only be transferred outside our company in necessary cases, in particular the following:

- the transfer of your personal data to us is required by law (this mainly concerns the transfer of your personal data to state authorities or agencies);
- the transfer of your personal data is necessary for us to fulfill our obligations under the contract concluded with you (or your employer);
- you have given us your consent to transfer your personal data to another entity;
- we transfer your personal data to our processor – this transfer occurs in situations where we are unable to perform a certain activity involving the processing of your personal data ourselves (or it is disadvantageous for us to do so) and we have therefore entrusted another person with its performance; this person is our processor from the perspective of the GDPR; we have verified that this person provides sufficient guarantees to implement appropriate technical and organizational measures so that the processing of your personal data complies with the requirements of the GDPR and that your rights are protected; a written contract on the processing of personal data is always concluded with this processor, which specifies the subject matter and duration of the processing, the nature and purpose of the processing, the type of personal data and categories of data subjects, our obligations and rights; this processor also has certain obligations set out directly in the GDPR; however, we (not the processor) are always responsible for the processing of your personal data.

As a rule, we do not transfer your personal data to third countries (i.e. outside the European Union or the European Economic Area) or to international organizations. The only exception is when, based on your consent, we transfer your personal data to our distributor, who is located in a third country. Exceptionally, this may include countries that do not provide adequate protection of personal data, to which we hereby expressly draw attention.

## **WHAT ARE YOUR RIGHTS IN RELATION TO THE PROCESSING OF YOUR PERSONAL DATA?**

In connection with the processing of your personal data, you have a number of rights, which are explained in detail below. First, however, it is necessary to provide some general information relating to the exercise of these rights.

We are obliged to facilitate the exercise of your rights, so you can contact us in various ways (by letter, email, telephone, or data box). Contact details for all these methods can be found above. Since we are required to verify your identity when reviewing your request, some methods of exercising your rights are more appropriate than others. The ideal methods of exercising your rights, which will save both you and us time, are as follows:

- sending a letter to our registered office, ideally with your officially certified signature;

- sending an email to our email address, ideally signed with your guaranteed electronic signature;
- sending a message to our data box;
- in person at a pre-arranged meeting.

In order for us to process your request quickly and properly, the following information must be clearly stated in the request:

- who is submitting the request (the applicant's first and last name, date of birth, and address);
- what right are you exercising (it is sufficient to describe it in words or refer to the relevant article of the GDPR);
- what you are requesting and, if applicable, why (explained in more detail below for each right);
- how would you like to receive a reply (by letter, email, phone, or data box);
- your contact details (phone number, email address) for any additional questions we may have.

It is our obligation to process your requests free of charge, however, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we have the right to charge you a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested, or we have the right to refuse to act on your request.

We will always respond to your request within one month of receiving it.

And now let us turn to the rights themselves.

### **Right of access**

You have the right to request confirmation from us as to whether we process your personal data and to obtain an overview of this data from us. Furthermore, you have the right to obtain the following information from us in connection with the processing of your personal data:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom your personal data have been or will be disclosed (in particular recipients from countries outside the European Union and the European Economic Area or international organizations);
- the envisaged period for which your personal data will be stored;
- the existence of the right to rectification or erasure of your personal data, the right to restriction of processing of your personal data or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from you, any available information as to their source;
- the fact that automated decision-making takes place and related information.

Where your personal data are transferred to a third country or to an international organisation, you have the right to be informed of the appropriate safeguards pursuant to Article 46 GDPR relating to the transfer.

If this is not clear from your request, we may ask you to specify exactly which of your personal data your request concerns.

If you also wish to receive a copy of your personal data that we process, you have the right to do so, and the first such provision is free of charge. For additional copies, we may request a reasonable fee not exceeding the costs necessary to provide the information. The exercise of this right shall not adversely affect the rights and freedoms of others.

### **Right to rectification**

You have the right to request that we correct your personal data that we process and that is incorrect or inaccurate. Just let us know what data and how we should correct it. We will do so without undue delay.

You also have the right to request that we supplement your personal data that we process and that is incomplete, according to your instructions. We will comply with your request if we actually need the supplemented personal data for the purposes of the processing in question.

If you request this when exercising this right, we will also inform you about the recipients of your personal data to whom your personal data has been disclosed in the past and to whom we have notified the corrections or additions to your personal data requested by you.

### **Right to erasure („right to be forgotten“)**

You have the right to request that we erase your personal data in the following cases:

- you believe that we no longer need your personal data for the purposes for which we collected or otherwise processed it;
- you withdraw consent on which the processing is based and there is no other legal ground for the processing;
- you have objected to us processing your personal data on the basis of our legitimate interests and you believe that we no longer have any overriding legitimate reasons for processing it;
- you believe that we are processing your personal data unlawfully;
- you believe that we are obliged to delete your personal data under European Union law or the law of a European Union Member State.

When exercising this right, you must state in your request which of the above cases you are requesting the erasure of your personal data on the basis of, as well as exactly which of your personal data you are requesting to be erased. Your request should also be duly justified, otherwise it cannot be granted.

If we find your request justified and the processing of your personal data is not necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by European Union law or European Union Member State law to which we are subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in us;
- for reasons of public interest in the area of public health;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- for the establishment, exercise or defence of legal claims,

we will erase the personal data you requested without undue delay.

If we have published your personal data and subsequently deleted it in accordance with your right to erasure, we are also obliged, taking into account the available technology and the cost of implementation, including technical measures, to inform the controllers who process your personal data that you also require them to delete all links to your personal data, copies or replications thereof.

If you request us to do so in exercising this right, we will also inform you about the recipients of your personal data to whom your personal data has been disclosed in the past and to whom we have notified the deletions of your personal data requested by you.

### **Right to restriction of processing**

Restriction of processing means marking personal data and ceasing all processing except storage. In other words, we may continue to retain personal data whose processing is restricted (i.e., we cannot delete it), but we are not authorized to use such personal data in any way.

You have the right to request that we restrict the processing of your personal data in the following cases:

- you contest the accuracy of your personal data;
- you believe that we are processing your personal data unlawfully, but instead of erasing your personal data, you only request that its use be restricted;
- we no longer need your personal data for the purposes of processing (and should therefore delete it), but you require it for the establishment, exercise, or defence of legal claims;
- you have objected to us processing your personal data on the basis of our legitimate interests, which we have not yet decided on.

When exercising this right, you must state in your request which of the above cases you are invoking to request the restriction of the processing of your personal data and also specify exactly which of your personal data you wish to have restricted. Your request must also be duly justified, otherwise it cannot be granted.

If we find your request justified, we will restrict the processing of the personal data you have requested without undue delay. During the period of this restriction, we are only entitled to process your personal data with your consent, or for the purpose of determining, exercising, or defending legal claims, for the protection of the rights of another natural person or legal entity, or for reasons of important public interest of the European Union or a European Union Member State.

If the reasons for restricting the processing of your personal data cease to exist, we will notify you and then lift the restriction on processing.

If you request us to do so in exercising this right, we will also inform you about the recipients of your personal data to whom your personal data has been disclosed in the past and to whom we have notified the restriction of processing of your personal data as requested by you.

### **Right to data portability**

If we process your personal data on the basis of your consent or a contract concluded with you (or your employer), and we perform this processing automatically (i.e. not manually), you have the right to request that we provide you with (or allow you to download) your personal data that you have provided to us in a structured, commonly used, and machine-readable format, or to request that we provide this personal data directly to another controller.

We will only comply with your request to transfer your personal data directly to another controller if this is technically possible.

When exercising this right, you must specify in your request which of your personal data the request relates to, whether you want us to transfer the personal data only to you or directly to another controller, and how we should do so. Without this information, we cannot comply with your request.

The exercise of this right must not adversely affect the rights and freedoms of others. If this is likely to happen, we must refuse your request or not comply with it in full.

### **Right to object**

If we process your personal data on the basis of our legitimate interest, you have the right to object to this at any time and request that we no longer process your personal data in this way. Your request must clearly state which of your personal data the objection relates to and against which processing the objection is raised. Your request should also be reasonably justified. Upon receipt of your request, we are obliged to no longer process your personal data or to prove to you that there are serious legitimate reasons for such processing that outweigh your interests or rights and freedoms, or that the processing of your personal data is necessary for the establishment, exercise, or defence of legal claims.

If we process your personal data for direct marketing purposes, you have the right to object to this at any time and request that we no longer process your personal data in this way. Your request must clearly state that the objection is raised against processing for direct marketing purposes and to which of your personal data it relates. Upon receipt of your request, we are obliged to no longer process your personal data for direct marketing purposes.

### **Other rights**

You have the right not to be subject to any decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, except where such a decision:

- is necessary to conclude or perform a contract with you;
- is permitted by European Union law or the law of a European Union Member State applicable to us, which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests;
- is based on your explicit consent.

If we process your personal data on the basis of your consent to the processing of personal data, you have the right to withdraw this consent at any time. However, the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

If you consider that the processing of your personal data infringes the GDPR, you have the right to lodge a complaint with a supervisory authority, in particular in the country of your habitual residence, place of your work or place of the alleged infringement. This supervisory authority for the Czech Republic is the Office for Personal Data Protection, located at Pplk. Sochora 27, 170 00 Prague 7, Czech Republic, ID No.: 708 37 627, <http://www.uoou.gov.cz/>.

### **CONCLUSION**

We firmly believe that the above information is clear to you. However, if you do not understand something or are unsure about anything, please do not hesitate to contact us with your questions. This will prevent a number of misunderstandings.

**BRM AERO, s.r.o.**