

**Information for the Data Subject – Data Processed to Fulfil Contractual and Statutory Obligations and on the Basis of the Subject’s Consent**

**Information of the controller for the personal data subject concerning the processing of personal data obtained from the data subject to fulfil contractual and statutory obligations and on the basis of the subject’s consent**

according to Article 12 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, General Data Protection Regulation (hereinafter referred to as the “**Regulation**”), kept by the entity:

**Porta Invest, s.r.o.**, RN 049 98 391,  
with its registered office at Lucemburská 2136/16, 130 00 Praha 3  
Registered in the Commercial Register kept by the Municipal Court in Prague, Section C,  
Insert 256821  
Executive Manager and responsible person Marek Bartes  
contact: bartes@portainvest.cz; in writing to the address above  
(hereinafter referred to as the “**Controller**”)

The Controller provides you with the following information in accordance with the Regulation

**1. Contact details of the Data Protection Officer**

The Data Protection Officer was not appointed for the Controller because the Controller is not required to do so.

**2. Description of data subject categories processed by the Controller in relation to you, the categories of personal data, and the purpose of their processing**

The categories of personal data processed by the Controller in relation to you in fulfilling contractual and statutory obligations:

- name and surname or business name,
- RN, VAT ID if any, and the name of the company you act on behalf of
- national ID number
- address
- e-mail address
- telephone

Purpose of processing of personal data: fulfilment of statutory obligations of the Controller and contractual obligations related to contracts entered into by the Controller and you, negotiations on the conclusion of contracts, pre-contractual negotiations. In case the data subject has given explicit consent, then marketing consisting mainly of the sending of business offers of the Controller.

**3. Description of the categories of recipients to whom your personal data may be made available or transmitted, including recipients from third countries or international organizations**

All personal data may be provided to providers of brokerage, financial, legal, tax advisory and accounting services who cooperate with the Controller on the basis of a contractual relationship and who are required to ensure its protection under this contractual relationship.

Personal data will not be provided to recipients from third countries or international organizations.

#### **4. Information about your rights**

- a. On your written (by post or otherwise) or e-mail request, the Controller will provide you with information pursuant to Articles 15 to 22 of the Regulation, without undue delay, and in any case within one month of receiving the request.
- b. In particular, you have the right to request access to the personal data processed by the Controller, to have it corrected in the case of inaccuracies, to have it deleted (right to be forgotten) or to have the processing limited, and to object to the processing – meaning to raise an objection to the processing of personal data. You are entitled to obtain a confirmation from the Controller whether the personal data concerned are processed or not. The Controller points out that as far as the personal data obtained to fulfil statutory and contractual obligations are concerned, a service required by you cannot be provided unless you provide contact details.
- c. You are entitled to obtain (as a copy) personal data concerning you that you have provided to the Controller in a structured, commonly used and machine-readable format, and you have the right to pass this data to another controller without being prevented to do so by the Controller.
- d. If personal data is processed on the basis of your consent, you are entitled to withdraw this consent at any time by delivering the withdrawal to the Controller.
- e. You are entitled to complain about the Controller's procedure at any time with the supervisory office, which is the Office for Personal Data Protection.

#### **5. Method of processing of personal data**

There is no automated processing and decision making, including profiling, in the practice of the Controller. Personal data will be processed manually by the Controller or the processor of the Controller (above).

#### **6. Information on scheduled deadlines for deletion of individual categories of personal data**

The personal data of the subjects processed under the statutory and contractual obligations by the Controller will be erased always without undue delay after the expiry of the statutory period for which the Controller is obliged to keep the data (in particular the period for the archiving of accounting documents, unless another archiving period is longer).

Personal data processed based on your consent will be erased always without undue delay after the expiry of the period for which they are needed; but at the latest when the consent to the processing ceases.

#### **7. Description of the technical and organizational security measures that the Controller has taken to protect your personal data**

##### **a) Protection against unauthorized access to personal data**

Access to recording equipment and paper records has been provided by the Controller in particular as follows: recording equipment and paper records are located in a

lockable room of the Controller or, as the case may be, in a lockable cabinet. Only authorized persons may enter the lockable room. Other persons have access to the room only when accompanied by authorized persons. The software access to the recording equipment is protected by a username and password, and the Controller's storage is sufficiently secured.

**b) Protection against unauthorized reading, copying, transferring, editing and deleting of your personal data**

Access to personal data is protected by a login name and password. Authorized persons are trained on how to handle personal data.

**c) Protection from outside attack**

The Controller's system is connected to the Internet network. Anti-intrusion measures have been taken in the form of a firewall security, security by login name and password.

**d) Protection against unauthorized use of login data (negligence)**

Login passwords to the Controller's system are regularly changed.

**e) Protection against ignorance**

All authorized persons are properly instructed. Instructions and training are principally meant to inform such persons about the functionality of the Controller's system, recording equipment and software (including updates), as well as rights and obligations in the processing of personal data within the meaning of the Regulation.