

INFORMATION ON PROCESSING OF PERSONAL DATA OF EMPLOYEES, EXTERNAL CO-WORKERS, CUSTOMERS AND BUSINESS PARTNERS OF MOROSYSTEMS, s.r.o.

MoroSystems s.r.o., Business Registration Number: 277 04 424, with its registered office at Smetanova 1022/19, Veveří, 602 00 Brno (hereinafter referred to as „MoroSystems“) and (hereinafter also as „We“), as a personal data administrator, informs you as a user of the web sites morosystems.com and www.morosystems.com about the collection of personal information and about the privacy policy described below.

On 25th May 2018, Regulation of the European Parliament and of the EU Council No 2016/679 dated 27th April 2018 came into force. This regulation deals with protection of individuals with regards to processing of personal data, free movement of such data and nulls and voids Directive 95/46 / EC (General Data Protection Regulation).

By providing this information, we would like to inform employees of the Company, its external workers, customers and business partners (suppliers, subcontractors) and other physical or legal persons with whom our Company maintains contacts without having a contractual relationship, which personal information we collect about them, how we deal with this information, what are the sources of such information, for what purpose it is used, to whom it is provided, where they can get more details about the personal data we process about them and what their individual rights concerning the protection of personal data are.

PRIVACY POLICY

1. MoroSystems (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 purpose of their processing; the personal data is stored only for as long as necessary.

2. When processing personal data, we provide adequate security against its unauthorized or accidental access, amendment, destruction or loss, unauthorized transmission, or unauthorized processing, as well as misuse.

3. We shall clearly inform all persons concerned of processing of personal data and of their rights to accurate and complete information regarding the processing of such data.

4. We have adopted and adhere to appropriate organizational and technical measures, internal standards and procedures to ensure the necessary level of security appropriate to the risks assumed. All persons who come into contact with personal data are obliged to maintain confidentiality about the information obtained in connection with processing of such data.

MANAGEMENT AND PROCESSING OF PERSONAL DATA

1. Company MoroSystems s.r.o., Business Registration Number (IČ): 277 04 424, with its registered office at Smetanova 1022/19, Veveří, 602 00 Brno, is the management subject of personal data. The company is registered in the Commercial Register kept by the Regional Court in Brno, Section C, Insert No. 53303 (hereinafter referred to as “the Company”)

2. In certain cases the Company also manages personal data of persons concerned on behalf of another person (another administrator). These include, for example, cooperation with other MoroSystems companies (hereinafter referred to as “the MoroSystems Group”); a list of entities belonging to the MoroSystems Group is provided in the Appendix 1 of this information and will be updated as and when necessary.

PURPOSE AND LEGAL TITLE OF PROCESSING

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

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

a) preventing damage to property of the persons concerned entrusted to the Company and the Company's assets

b) fulfillment of reporting obligations to public authorities

c) fulfillment of obligations arising from the decision of court and/or state administration authorities

d) fulfillment of obligations imposed on the Company in direct relation to services which it is authorized to provide to its business partners, in particular pursuant to Act No. 480/2004 Coll. on some services of information companies, as amended and in force

e) fulfillment of archiving obligation

f) negotiation of rights and obligations and realization of rights and obligations from concluded contracts and agreements, in particular the realization of rights and obligations arising from established or concluded employment and similar relationships with candidates or employees and from established or concluded business relationships with potential or existing customers.

In such cases, personal data is necessary i.e.: to enable to negotiate, conclude or execute contractual relationship without undue legal risks, including negotiations of its conclusion or amendment.

(g) protection of rights and interests protected by law, in particular in the interest of

- protection of rights and legally protected interests of the Company, the beneficiaries or other persons concerned for example in providing information which is mandatory to be provided by the Company in relation to third parties recovering claims, forfeiting of collateral or other claims or in the expansion and development of services provided
- negotiations on the forfeiting of rights and obligations, including related implementation and follow-up negotiations with third parties, etc.
- management of any disputed agenda, in particular for the purposes of litigation or other disputes (i.e.: the fulfillment of the evidentiary duty)

2. With the consent of person concerned

a) This is usually the case where the person concerned voluntarily agrees that the Company processes personal data provided by the person concerned or otherwise obtained. If the person concerned does not provide the consent, the Company may not be able to provide services, products or programs, or will be required to adjust reasonably the availability, scope or conditions of the services, products or programs provided. Based on the consent of the person concerned, the Company processes personal data of the person concerned for the following purposes:

- care for employees (candidates, former employees) or customers (potential customers, former customers) in activities that do not constitute work, business or other contract or rely on any other legal framework for processing of personal data and which include the following activities: market research, maintaining courtesy, relationship and communication.

THE SCOPE AND MANNER OF PROCESSING PERSONAL DATA

The Company processes personal data to the extent necessary to fulfill the afore-mentioned purposes. In particular, it processes contact and identification data, creditworthiness data, credibility and payment commitments, description

and other data and, to the extent necessary and justified, data on other persons, generally available from public sources. For more information on the extent of processing client's personal data see **Appendix 2 of 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 are mostly processed by Company employees and, to necessary extent, by a third party entrusted with the processing of personal data under a special written agreement concluded prior to any personal data being transferred to that third party. This special agreement contains the same personal data processing safeguards that the company itself follows in accordance with its legal obligations.

RECIPIENTS OF PERSONAL DATA

Personal data of the persons concerned (employees, candidates, former employees) or customers (potential customers, former customers) or business partners (potential or former business partners) are made available to extent necessary, in particular, by the Company's authorized employees where personal data is needed in the performance of their duties. It is accepted that to fulfil their duties they ensure that all safety measures are observed. In addition, personal data of the persons concerned are passed on to third parties who, under a special written contract, are involved in the processing of personal data of the persons concerned, or that such personal data are made available to them for other reasons in accordance with the law.

In accordance with the applicable law, the Company is entitled or required, without the consent of the person concerned, to transmit personal data:

- a) to the competent public authorities, courts and law enforcement authorities for the purpose of carrying out their statutory duties and for the purpose of enforcement of law
- b) to other persons to the extent provided for by law, such as third parties, for the purpose of recovering the Company's claims against the persons concerned

On the basis of consent of the person concerned the Company is entitled to manage information including confidential information, trade secrets, financial details and other classified information pursuant to Act No. 412/2005 Coll. on pro-

tection of classified information and on security authority, we pass the personal data further to:

- a) entities belonging to the MoroSystems group, persons with financial interests in the Company, for the purpose of complying with the Company's legal obligations, concluding and performing the contract, offering products and services, protecting the rights and legally protected interests of the Company, customer care and mutual information within the MoroSystems Group on matters that testify to customer creditworthiness and credibility
- b) entities belonging to a group of persons with financial interests in customer's company, if this is agreed in a written business contract with the customer of the Company
- c) to other persons for the purpose of transfer of information, offering products and services to the Company, the Company shall, in the event of the consent of the person concerned, carry out such transfers fully in accordance with the other conditions set out in this information, in particular in relation to the purpose, scope and duration of data. In this case, the Company will only pass on identification and contact information to the extent necessary for the recipient.

TRANSMISSION OF PERSONAL DATA ABROAD

Personal data of the persons concerned are processed in the territory of the Czech Republic and in other European Union countries where entities belonging to the MoroSystems Group are located and share the same standards of personal data protection as the Company. Neither the Company nor its entities involved in processing of personal data of the persons concerned transfer the personal data of the persons concerned to countries outside the European Union.

THE PROCESSING PERIOD OF PERSONAL DATA

The Company processes personal data of the persons concerned only for as long as is necessary for the purposes of their processing, unless the processing period is imposed by law. Responsible persons authorized by the Company continuously assess whether the need to process certain personal data necessary for a particular purpose continues. If the Company finds that the data is no longer needed for any of the purposes for which it was processed, it will destroy the data. The need to process the relevant personal data for a given purpose

after the usual usability period has been carefully assessed by the Company, and based on the purpose of processing the usability period is evaluated.

THE RIGHT OF THE PERSON CONCERNED TO WITHDRAW HIS CONSENT

In this information, the Company explains why it needs personal data of the persons concerned and that it can only process it for certain purposes with their consent. The person concerned is not obliged to grant consent to the processing of his/her personal data and at the same time is entitled to withdraw the consent already granted. If the person concerned withdraws his consent, the Company terminates the processing of the relevant personal data for purposes requiring appropriate consent, but may be entitled or even required to continue to process the same personal data for other purposes under the appropriate legal title.

If the person concerned does not grant or withdraw his consent, the Company may:

a) adequately adjust the availability, scope or conditions of its products or services; or

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 conditions of the contract.

If the person concerned wishes to withdraw his/her already granted consent to the processing of personal data, he/she may contact MoroSystems s.r.o., Smetanova 1022/19, Veveří, 602 00 Brno in writing, and by e-mail at info@morosystems.cz.

PERSONAL DATA SOURCES

In particular, the Company acquires personal data of the persons concerned:

(a) directly by the persons concerned, directly, for example, when forwarding documents for negotiating and concluding contracts relating to employment relationships or products or services provided, or indirectly, for example, when using the products or services themselves by the persons concerned or in making available information on products and services to those concerned, i.e.: through the company's website, etc.

b) from publicly available sources (public registers, records or lists)

c) from third parties authorized to manage the personal data of the person concerned and hand them over to the Com-

pany in fulfilment of specified conditions, such as from members of the MoroSystems group

d) from potential candidates and services or products of the Company in marketing events and campaigns

e) from own activities, by processing and evaluating other personal data of the persons concerned.

YOUR RIGHTS RESULTING FROM PROCESSING OF PERSONAL DATA

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

a) the right of access to personal data;

b) the right of rectification;

c) the right of cancellation ("right to be forgotten");

d) the right to limit the processing of data;

e) the right to object to the processing; and

f) the right to lodge a complaint about the processing of personal data.

Your rights are explained below to make their content clearer to you.

You can apply all your rights by contacting us at info@morosystems.cz

You can file a complaint with the supervisory authority, which is the Office for Personal Data Protection (www.uoou.cz).

The right of access means that you can at any time ask for our confirmation whether personal data concerning you are processed or not and, if so, for what purpose, to what extent, whom they are made available, what period we will process them for, whether you have the right to rectify, erase, limit processing or object to where we have obtained personal information and whether it is based on the processing of your personal data for automated decision making, including any profiling. You also have the right to obtain a copy of your personal information, with the first provision being free of charge, and the Provider may require reasonable reimbursement of administrative costs for additional provisions.

The right to rectify means that you may at any time ask us to correct or supplement your personal data if it is inaccurate or incomplete.

The right to delete means that we have to delete your personal data if

- they are no longer needed for the pur-

poses for which they were collected or otherwise processed

- processing is illegal

- you object to the processing and there are no overriding legitimate reasons for processing; or

- a legal obligation is imposed.

The right to restrict processing means that until we resolve any disputes regarding the processing of your personal data, we must restrict the processing of your personal data so that we may only store them and, if applicable, use them to determine, execute or defend legal claims.

The right to object means that you may object to the processing of your personal data we process for direct marketing or for legitimate interest. If you object to processing for direct marketing purposes, your personal data will no longer be processed for that purpose.

ELECTRONIC COMMUNICATION MEANS AND MOBILE APPLICATIONS

The Company develops its technologies to care for all concerned so that the people concerned can make appropriate use of its products, services and programs using modern electronic means of communication. In particular, services related to the use of the Internet, the use of social networks and various online applications. The Company processes all personal data collected about the persons concerned in accordance with the terms and conditions set forth in this information.

In commercial communication through websites and social networks, the company also uses cookies - small text files that are stored on the person's computer when they first load the website. More information on the use of cookies is available at www.morosystems.com and www.morosystems.com.

This information comes into effect on 25 February 2019.

Appendices are an integral part of this information:

Appendix 1: MoroSystems Group

Appendix 2: The scope of personal data processed

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APPENDIX 1 MOROSYSTEMS GROUP

As of 25th February 2019 MoroSystems, s.r.o. is formed of the following companies:

MoroSystems, s.r.o.

registered address: Smetanova 1022/19, Veverří, 602 00 Brno

Business registration number: 277 04 424

Entry in the Commercial Register kept by the Regional Court in Brno, Section C, Insert No. 53303

MoroSystems Software Development, s.r.o.

registered address: Francouzská 421/87, Zábřdovice (Brno-north), 602 00 Brno

Entry in the Commercial Register kept by the Regional Court in Brno, Section C, Insert No. 85792

MoroSystems SK, s.r.o.

registered address: Hraničná 18/1728, 821 05 Bratislava, Slovakia

Entry in the Commercial Register kept by the Regional Court in Bratislava I, Insert No. 95680/B

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APPENDIX 2 THE EXTENT OF PERSONAL DATA BEING PROCESSED

1. Identification data – include, in particular, name, surname, date and place of birth, birth number, permanent address, type, number and validity of the identity card; for individuals – businesses ID (Business Registration Number) and VAT. Other possible identifying information is, for example, the IP address used by the PC, bank details and the account number, and sets of specific authentication data that has been agreed by both the company and the person concerned.

2. Contact details – contact address, telephone numbers, email, fax addresses or other similar contact details.

3. Data necessary to aid a decision to conclude a contract – these are mainly necessary to assess the risk of the contractual relationship or trade. Depending on the type of contract concluded, these data include, but are not limited to, data on integrity, medical fitness, possible execution, insolvency proceedings, entry into liquidation, and data on business contacts.

4. Data arising from fulfillment of contract obligations – depending on the nature of the product or service provided we process data relating to the product or service provided. Personal data such as the duration of the contract, the due date, the company's liabilities to the person concerned, the company's claims on the person concerned, the details of the payment transactions with the person concerned, the use of payment instruments in relation to person concerned are processed.

5. Personal information obtained in connection with the provision of our products or services.