

Personal data processing and protection rules

1. Information about the company

1.1 The principles of processing and protection of personal data within QA Czech s.r.o., ID No.: 28828836, VAT No.: CZ28828836, with registered office at Smilova 2934, 530 02 Pardubice (hereinafter referred to as "the Company"), regulate the rules for handling personal data of the following individuals (hereinafter also referred to as "Subjects"):

- visitors to the www.qaczech.com website,
- the company's customers,
- the company's suppliers,
- job seekers and employees of the company,
- certain third parties.

1.2 The Company processes personal data of natural persons in accordance 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, hereinafter also referred to as the "GDPR"), or in accordance with other legislation in the field of personal data protection.

1.3 The Company acts in principle as a controller in the processing of personal data that independently determines the purposes and means of processing personal data of natural persons, or on which certain personal data processing obligations are imposed by law.

1.4 The Company acts as the processor of personal data of natural persons in the event that it processes personal data of natural persons for another controller, under the instructions thereof.

1.5 The Company is not obliged to appoint a Data Protection Officer.

1.6 Contact details of the company: 2934 Smilova Street, 530 02 Pardubice, email: info@qaczech.com.

2. What principles do we follow when processing your personal data?

2.1 We legally process personal data in accordance with the GDPR, based on at least one of the legal titles expressed therein.

2.2 We only process personal data for specified and legitimate purposes. We ensure that personal data collected for different purposes are kept separately and are not used for other purposes without further notice.

2.3 We process personal data in a proportionate manner and only ever to the extent necessary for the intended purpose.

2.4 We only retain personal data for as long as is necessary to achieve the intended purpose. Personal data for which the statutory retention period has expired and which we no longer need are securely disposed of without undue delay.

2.5 We keep personal data accurate and updated where necessary. We employ appropriate measures to correct or delete inaccurate personal data.

2.6 We process personal data fairly and with complete transparency. We always properly inform personal data subjects, i.e. natural persons whose personal data we obtain, in accordance with the GDPR, in particular about who we are, for what purpose and on what legal basis we process personal data, how long we store such data, and what rights they can exercise in relation to their personal data.

2.7 We appropriately secure personal data against unauthorised or unlawful processing and against accidental loss, damage or destruction. We only disclose personal data to authorised persons and institutions.

3. On what legal grounds do we process personal data?

In particular, we act based on the following legal grounds (legal titles) when processing personal data:

- for the fulfilment of a legal obligation to which the company is subject, or
- for the performance of a contract to which the data subject is a party, or to carry out pre-contractual measures at the request of the data subject, or
- in pursuit of a legitimate interest of the company.
- If In addition to any of the above-mentioned legal titles, we will ask for your consent to process your personal data. Consent can be withdrawn at any time but is not retroactive.

4. What personal data do we process and for what purpose?

In connection with the provision of our services (translation, proofreading, interpreting and desktop publishing), we process, under the conditions and within the limits set by the applicable legislation, in particular the GDPR and related legislation, the following personal data:

4.1. Personal data provided by potential or existing customers of the company, usually in the scope of identification and contact data (e.g. name, surname, address, email address, telephone number, ID number, VAT number), other operational data (e.g. payment data, data obtained through contract performance):

- for the purpose of concluding and subsequent performance of contracts with customers,

- for the purpose of fulfilling legal obligations under relevant legislation (in particular accounting, financial and tax matters),
- in order to implement the legitimate interests of the company.

4.2. Personal data provided by potential or existing suppliers of the company, usually in the scope of identification and contact data (e.g. name, surname, address, email address, telephone number, ID number, VAT number), other operational data (e.g. payment data, data obtained through contract performance):

- for the purpose of concluding and subsequent performance of contracts with customers,
- for the purpose of fulfilling legal obligations under relevant legislation (in particular accounting, financial and tax matters),
- in order to implement the legitimate interests of the company.

4.3. Personal data provided by job applicants seeking employment within the company, usually in the scope of identification and contact data (e.g. name, surname, date of birth, registration number, address, telephone number, email address), as well as other operational data necessary in relation to the job (e.g. education and experience, confirmation of eligibility to work):

- for the purpose of conducting selection procedures for the given position,
- for the purpose of keeping a register of candidates for other positions in the company for a limited period of time.

4.4. Data provided by visitors to the website in the form of cookies, which contain information about the visitor's visit to the website and other activity on the website. For this purpose, the Company uses the Google Analytics tool with data anonymisation and is not able to identify individual website visitors. The information obtained is therefore anonymous and is not subject to personal data processing under the GDPR.

4.5 Special categories of personal data of customers or suppliers (sensitive data) are not processed by the company.

5. How long will we process personal data?

5.1 We will only process personal data for the period of time necessary to achieve the purpose for which it was obtained - for example, from the moment a customer provides personal data in the context of pre-contractual arrangements with the company, for the duration of the contractual relationship until the termination of contractual obligations, or until the expiry of the last of the legal grounds (legal titles) that entitled the company to process said data.

5.2 Once the purpose of the processing has ceased or the company has no legal grounds to further process personal data, said personal data will be securely erased or destroyed.

6. To whom can we transfer personal data?

The Company reserves the right to disclose personal data to:

- suppliers who provide accounting services to the Company under a processing contract,
- contractors who provide translation, proofreading, interpretation and graphic design services to the company under a processing contract,
- to state authorities and other public authorities on the basis of a legal obligation to provide such personal data.

7. What rights do you have with regards your personal data?

7.1 In accordance with the principle of transparency, you have the right to information about the processing of your personal data. The Company provides information upon request. General information about personal data processing activities is also contained in this policy. For a full list of the information provided, please refer to the provisions of Articles 13 and 14 of the GDPR.

7.2 You may exercise other rights under Articles 15-22 of the GDPR Regulation by requesting:

- **The right to confirm whether** or not your personal data is being processed by the company and, if it is, to obtain access to your personal data, including further information about its processing.
- **The right to rectification of** inaccurate personal data or, where appropriate, taking into account the purposes of the processing, the right to supplement incomplete personal data, including by providing an additional declaration.
- **The right to erasure of** personal data if your personal data is no longer necessary for the purpose of processing, you have withdrawn your consent to processing, or you wish to object to the processing of your personal data and there are no overriding legitimate grounds for processing.
- **The right to restrict the** processing of personal data if you object to such processing or contest the accuracy of the personal data for the time necessary to verify the accuracy of the personal data, or if the company no longer needs your personal data for the purpose of processing but you require it for the establishment, exercise or defence of legal claims.
- **The right to the portability of** automated personal data obtained by the company directly from you on the basis of consent or performance of a contract, where the company will transfer the personal data to you or to another controller of your choice in a commonly used and machine-readable format.
- **The right to object to** the processing of your personal data if the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the company, the processing is necessary for the purposes of the legitimate interests of the company or a third party, for direct marketing purposes or for scientific or historical research purposes or for statistical purposes.
- **The right not to be subject to any decision based solely on automated processing**, including profiling with legal effects for the subject; otherwise, you have the right to human intervention by the company (human review of the decision), the right to express your opinion or the right to challenge the decision.

7.3 If the processing of personal data is based on consent, you have the right to withdraw your consent at any time in writing by sending a letter to the Company's address or emailing the Company at info@qaczech.com. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal.

7.4 In addition to the rights set out above, you have the right to lodge a complaint with the relevant supervisory authority if you believe that the Company's processing of personal data is in breach of the law. The competent supervisory authority in the Czech Republic is the Office for Personal Data Protection.

8. How do we protect personal data?

8.1 We handle personal data in full compliance with applicable law, including the GDPR. The personal data of the subjects is secured by the company through the set organisational and technical measures.

8.2 All personal data in documentary form is stored in locked locations, accessible only by authorised persons who need to handle the personal data immediately for the purposes set out in this policy, and only to the extent necessary. Access to this personal data is protected by physical and electronic security measures.

8.3 All personal data in electronic form is stored in databases and systems that can only be accessed by authorised persons who have an immediate need to handle the personal data for the purposes set out in this Policy and only to the extent necessary. Access to such personal data shall be protected by physical and electronic means of computer security.

8.4 Employees and contractors of the Company who process personal data are obliged to maintain confidentiality in relation to personal data of the subjects and of security measures, the disclosure of which would compromise the security of personal data. This confidentiality obligation shall continue to apply even after the termination of the contractual relationship with the company.

9. Validity

This policy on the processing and protection of personal data in the company takes effect on 1 November 2018. The original language of this document is Czech. In the event of ambiguity in another language, the interpretation according to the original language shall prevail.