

# Information about the processing of personal data in GEM System company

## 1 The Purpose of this Document

The purpose of this document is to provide you, the customers of GEM System a.s, with its registered office Na Pankráci 1062/58, 140 00 Prague 4, registered with the Municipal Court in Prague, Section B, Insert 17281

(hereinafter referred to as the “Administrator”), and all those who have a contractual relationship with us, clear and understandable information about:

- *what personal data we collect and for what purposes,*
- *how we process personal data and how we ensure its protection,*
- *to whom we transfer personal data,*
- *what your rights are in relation to personal data processed by us.*

If you do not find the answers to your questions regarding your personal data here, or if you would like some information explained in more detail, **please email us at [info@gemsystem.cz](mailto:info@gemsystem.cz).**



## 2 Processing of personal data

### Processing of personal data in business and employment law

In the context of business dealings and the execution of business orders, we process your personal data for the preparation and performance of a contract with you (if you are a natural person as a business partner),

or on the basis of the legitimate interest of our and our business partners (if you are a contact person of our business partner) and on the basis of our legal obligations, in particular in the following activities:

- *the use of personal data in the context of the execution of orders and business dealings,*
- *informing each other of banking and identification details,*
- *activities arising from the contractual relationship such as invoicing, making bank transfers and other performance of contractual obligations arising from the contractual relationship,*
- *storing and archiving data according to legal requirements.*

In the context of business dealings, we process your identification data (e.g. name, surname, titles, VAT number and registration number for self-employed persons), contact data (e.g. addresses, telephone, e-mail and other connections), company and employment data (e.g.

employer's company, job position, department, decision-making authority), records of your communication with us (sent and received e-mails, telephone call times) and other documents containing personal data provided by you

We also process other types of personal data in the context of employment law (e.g. date of birth or birth number, place of birth, nationality, marital status, education and other personal data documents provided by you).

We keep the data for 3 years from their last use, and in the case of accounting and tax documents for the statutory archiving periods.

## Processing of personal data on the basis of legitimate interest

The processing of personal data is necessary for the purposes of legitimate interests, in particular for the following purposes: protection of our property, protection of our legal claims, identity verification and risk management.

Recording of phone calls (if you call us at our helpdesk / dispatching), where we keep the voice recordings for 3 months after they are resolved. They are only kept for longer if a specific dispute arises until it is resolved.

## Processing of personal data with your consent

The processing of personal data that does not result from legal regulations or is not in the legitimate interest of GEM System a.s. may only be carried out with your consent. Providing such consent is entirely at your discretion. This is processing for the following purposes:

- *sending invitations to a number of client events, seminars, trainings, workshops or exhibitions,*
- *thanks in the form of a symbolic gift.*

*You may withdraw your consent to the processing of personal data for the above marketing purposes at any time. You can withdraw your consent, for example, by e-mail to [info@gemsystem.cz](mailto:info@gemsystem.cz)*

*or by letter to Na Pankráci 1062/58, 140 00 Prague 4. Withdrawal of consent does not apply to your data processed on the basis of other legal bases mentioned above.*

## Automatically processed personal data, including the use of cookies

Each time you visit our website, we may collect certain information about you, such as your IP address, the date and time you accessed the website, your computer's operating system, your language settings, or information about your Internet browser, based on our legitimate interest in continuously improving the quality of our service. At the same time, we may process informa-

tion about your behavior on our website, such as what links you visit on our website. If you are accessing our website from a mobile phone or similar, we may process information about these devices (data about your mobile phone, etc.) This information is anonymized and therefore we cannot attribute it to a specific person.



If you have cookies enabled in your browser, we consider this to be your consent to their use. We also only work with cookies in an anonymized form. We cannot determine from cookies how a particular user has behaved on our website (what pages they have visited, etc.) We use two types of cookies: functional and analytical cookies and their analogues, such as device fingerprinting. We use functional cookies to give you an optimal browsing experience. Analytical cookies are collected by the scripts of analytics companies (including Google Inc.), which then anonymize this data. After anonymizing, it is no longer personal data. We also use the knowledge from these cookies for advertising

purposes, whereby we can also show you advertising on third-party websites based on this data. The validity of stored cookies is a maximum of 24 months.

You can permanently withdraw your consent to the use of cookies on our website by deleting them and disabling their storage in your browser settings. You can also avoid the storage of data about the websites you visit by turning on the anonymous browsing function in common internet browsers (e.g. Internet Explorer, Safari, Firefox, Chrome). To control which of your analytics cookies we process, please use the Google app (can only be run from a computer).

### 3 Processing method

Your personal data is strictly protected by us. We process your personal data manually and in electronic information systems, which are subject to constant and

strict physical, technical and procedural control. All persons who come into contact with personal data in the course of their work are bound by confidentiality.

### 4 Access

We may transfer your data to companies (providers of processing software, services and applications, subsidiaries, even those we do not currently use) that help us with our activities, such as communicating with you.

If we use companies outside the EEA (European Economic Area), we will only ever use companies in countries that provide adequate protection for your personal data or under adequate safeguards.

### 5 Your rights

**According to the Data Protection Act, you have the right to:**

- *request information from us about what personal data we process about you,*
- *request an explanation from us regarding the processing of personal data,*
- *request access to this data from us and have it updated or corrected,*
- *require us to delete this personal data,*
- *in the case of processing based on your consent, withdraw your consent at any time,*
- *contact us or the Office for Personal Data Protection in case of any doubts about compliance with the obligations related to the processing of personal data.*

You can exercise these rights with the Administrator – GEM System a.s., for example by sending an e-mail to [info@gemsystem.cz](mailto:info@gemsystem.cz) or a letter to the address: Na Pankráci 1062/58, 140 00 Prague 4, Czech Republic.

**We will always inform you of the processing of your request without undue delay.**

**Date of last change: 1 July 2022**