

PERSONAL DATA PROCESSING POLICY DURING BUSINESS ACTIVITY

FOR CUSTOMERS, SUPPLIERS, JOB APPLICANTS, VISITORS TO THE PREMISES

In the joint stock company BONATRANS GROUP a.s. having its registered seat at the address: Revoluční 1234, 735 94 Bohumín, Czech Republic, business ID No: 27438678, entered in the Companies Register kept by the Regional Court in Ostrava, section B, inset 3173, (hereafter also the "**Company**"), we pay great attention to personal data protection. And so in compliance with Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data (hereafter also the "**regulation**" or the "**GDPR**") we have decided to issue this Personal Data Processing Policy (hereafter the "**Policy**").

The purpose of this document is primarily to **provide information** about what personal data the Company as the controller **processes about natural persons during business activities**, in what way and to which purpose and for how long, to whom and for what reason it may transfer it, and also to provide information about which rights natural persons have in the context of the processing of their personal data.

Present Policy applies to the processing of personal data:

- of our customers and service users,
- representatives of these customers or contact persons of customers,
- our suppliers,
- representatives of these suppliers or contact persons of suppliers,
- those interested in our services or goods,
- persons to whom we send commercial messages,
- visitors to our web sites,
- visitors to our premises.

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I PERSONAL DATA CONTROLLER

The personal data controller is the Company (for the Company's identification data, see above).

Contact data, where you can ask questions, make complaints and requests concerning personal data processing:

postal address: BONATRANS GROUP a.s. having its registered seat at the address: Revoluční 1234, 735 94 Bohumín, Czech Republic

Email: gdpr@ghh-bonatrans.com

Telephone: (+420) 597 083 112
WEB: <https://www.ghh-bonatrans.com/en/personal-data/>

II CATEGORIES OF PERSONAL DATA

Any information related to a natural person who the Company is capable of identifying constitutes personal data.

In the context of trading, the Company handles the following types (categories) of personal data¹:

1 IDENTIFICATION AND CONTACT DATA FOR CONTRACTUAL RELATIONS

Such data is essential for the conclusion and performance of a contract between the Company and you or company which you represent or for discussions about such a contract. This involves in particular your academic title, first name and surname, name, business name, date of birth, Business ID No, Tax ID No, address of permanent residence, address of registered seat or place of trading, signature etc. It also involves the academic title, first name and surname, position and signature of your representatives or entrusted persons.

We process the contact data so that we can contact you if needs be in connection with the contract, and this consists in particular of your telephone number and email address and that of your representatives or entrusted persons.

2 DATA ABOUT GOODS AND SERVICES AND DELIVERY DATA

We process data about which services or goods you order from us and the address to which the goods should be delivered. Similarly we process data about services or goods which we order from you.

3 PAYMENT DATA

We process the number of your bank account and data from your payment card so that we can identify your payments and so that we know to where we should make payments in your favour.

4 INVOICING DATA

We process data such as your first name and surname, invoicing address, data about purchased, ordered or delivered goods or service and their price essential so that we can issue billing for the goods or services, we can confirm the shipping notes and we can comply with the duty to keep accounts as imposed on us by the law.

5 DATA FROM COMMUNICATION BETWEEN THE COMPANY AND THE CUSTOMER OR SUPPLIER

This data arises during communication associated with the provision of services and goods between the Company and the customer or supplier. These are records of personal communication with the customer or supplier, written and electronic communication with the customer or supplier.

6 CAMERA RECORDINGS FROM COMPANY PREMISES

For reasons of security and to protect the legitimate interests of the Company, the complex and premises of the Company are covered by a camera system. The areas where cameras are located are always marked with a warning. Video recordings are processed using the camera system. More detailed information about the camera system is available on the web sites of the company in the section "Personal Data" and also at all our receptions in the Company complex and its premises.

¹ Some personal data comes in several categories, so it may be repeated several times in the overview.

7 DATA GAINED DURING REGISTRATION ON WEB SITES

This involves the data you enter during registration on our web sites, such as academic title, first name and surname, name, business name, date of birth, Business ID No, Tax ID No, address of permanent residence, address of registered seat or place of trading.

8 COOKIES AND OTHER TECHNOLOGIES

We use cookies and other technologies to gain information when the Company web sites are used. These are records about behaviour on the web sites gained from cookies and other technologies in the case of their permitting in the web browser. This data is processed for the operation of the Company web sites, measuring of pages' visitor figures and internet advertising.

9 DATABASE OF CUSTOMERS AND SUPPLIERS

If we have already made a business contact with someone, we retain his/her identification and contact data, such as academic title, first name and surname, business name, Business ID No, address of permanent residence, address of headquarters or place of trading, telephone number and email address, in our database. We use this data for communication, performing contracts, concluding new contracts, dealing with claims and servicing.

10 DATA FOR MARKETING PURPOSES

For marketing purposes we use the database of our existing customers and list of persons who may become our customers in the future. On this list we have their academic title, first name and surname, name, business name, Business ID No, address of permanent residence, address of registered seat or place of trading, telephone number and email address.

We send out commercial messages in the form of postal correspondence, email, internet or mobile messages.

With regard to the sending of commercial messages by email to existing customers of the Company about the same or similar products or services of the Company, this involves the use of personal data for the use of which we do not need your consent.

In other cases this data is used on the basis of your consent to the sending of commercial messages.

11 DATA FOR PROCEEDINGS ABOUT CONTRACT OF EMPLOYMENT

If you decide to apply for a job with us, we will need your identification and contact data and data about your education, abilities and skills and work experience hitherto provided by you to us in the form of a CV and cover letter for the period of proceedings about the concluding of a contract of employment or other employment-law contract.

12 DATA ABOUT VISITS TO PREMISES

For reasons of security and protection of health and assets of the Company and third parties, we process data about persons entering the Company complex. For these purposes it is essential for a person entering the complex to provide their identification data in the scope of first name and surname, national identity card or passport, number and type of such document, and also the name of the visited person and if applicable purpose of visit.

III PURPOSE AND LEGAL BASIS FOR PROCESSING

We process your data only in the scope essential for the relevant purpose – for example so that we can supply or receive goods or provide or receive a service. This involves also cases of negotiating a new contract. Many laws, such as the Accountancy Act, the VAT Act, the Income Tax Act etc., impose on us a duty to process your data.

The scope of the processed data depends on the purpose of processing. For certain purposes it is possible to process data directly on the basis of a contract, the legitimate interest of the Company, or on the basis of a law, but for other purposes only on the basis of your consent. We do not need your consent for the processing of personal data for the purpose of performance of a contract, performance of legal obligations for the reason of the legitimate interests of the Company. For this activity the personal data is processed in the scope necessary to achieve these purposes and for the period necessary for their attainment. Then the personal data is erased or anonymised.

This involves in particular the following purpose and legal bases, divided up according to the individual categories of personal data:

Categories of personal data²	Purpose	Legal basis for processing
1 Identification and contact data for contractual relations	proceedings concerning conclusion of contract	processing is essential in order to perform measures adopted before the conclusion of the contract at the request of this data subject
1 Identification and contact data for contractual relations 2 Data about goods and services and delivery data 3 Payment data 4 Invoicing data	performance of concluded contract – delivery or receipt of goods, provision or receipt of services, resolving claims, invoicing	processing is essential for performance of a contract where the data subject is a contracting party
3 Payment data	identification and proving of origin of payments	processing is essential for the purposes of the legitimate interests of the Company and for compliance with legal obligations applying to the Company - the duty to keep accounts. The intervention in the rights of the data subject is commensurate with the given purpose. Without the specified personal data the Company would be incapable of performing business activity in compliance with the legal system, and a data subject (customer) would not be able to receive goods or a service from the Company.
4 Invoicing data	issue of accounting or tax document, keeping of accounts, payment of tax	processing is essential for compliance with legal obligations applying to the Company - the duty to keep accounts, the duty to pay tax
10 Data for marketing purposes	sending of commercial messages by email to existing customers of the Company about the same or similar products or services of the Company	protection of Company's legitimate interests The legitimate interest of the Company is confirmed by the fact that this use of data is permitted by the provision of article 16

² The numbers of the personal data categories given in this column correspond to the numbers of the categories given in article II of this Policy.

		paragraph 2 of the REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL concerning the respect for private life and the protection of personal data in electronic communications
10 Data for marketing purposes	other than the aforementioned marketing of products or services telemarketing	the data subject granted their consent to the processing of their personal data for one or more specific purposes
1 Identification and contact data for contractual relations 2 Data about goods and services and delivery data 3 Payment data 4 Invoicing data 5 Data from communication between the Company and the customer or supplier	recovery of receivables, protection against claims of other persons	protection of Company's legitimate interests The intervention in the rights of the data subject is commensurate with the given purpose. Without the specified personal data and its handover, for example to a legal representative and court, the Company would not be able to assert its claims or defend itself against suits and claims of other parties.
11 Data for proceedings about contract of employment	recruitment of new employees in the Company	processing is essential in order to perform measures adopted before the conclusion of the contract at the request of this data subject
6 Camera recordings from Company premises	protection of property preventing the incidence of damage recovery of receivables, protection against claims of other persons	protection of Company's legitimate interests The intervention in the rights of the data subject is commensurate with the given purpose. The cameras only cover common spaces, and the recordings are kept for 1 week. The camera system also protects the property of data subjects brought onto the Company premises.
7 Data gained during registration on web sites	use of Company web sites	processing is essential in order to perform measures adopted before the conclusion of the contract at the request of this data subject
8 Cookies – information gained using cookies placed by the Company	implementation of transfer of electronic communication, or for provision of service via Company web sites, or for measuring the traffic to Company web sites	protection of Company's legitimate interests The legitimate interest of the Company is confirmed by the fact that this use of data is permitted by the provision of article 8 paragraph 1a), c), d) of the REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL concerning the respect for private life and the protection of personal data in

		electronic communications
8 Cookies – information gained using cookies placed by third parties (Google etc.)	internet advertisement	the data subject granted their consent to the processing of their personal data for one or more specific purposes using the internet browser's settings article 8 paragraph 1b) OF THE REGULATION OF THE EUROPEAN PARLIAMENT AND THE COUNCIL concerning the respect for private life and the protection of personal data in electronic communications
9 Database of customers and suppliers	communication, performing contracts, concluding new contracts, dealing with claims and servicing	protection of Company's legitimate interests The intervention in the rights of the data subject is commensurate with the given purpose. Without the specified personal data the Company would not be capable of performing business activity and the data subject would not be able to achieve a resolution of a claim, provision of servicing services.
12 Data about visits to company premises	protection of Company assets, safety, protection of health and assets	protection of Company's legitimate interests The intervention in the rights of the data subject is commensurate with the given purpose. The data serves to protect the health of data subjects, for example in the case of an extraordinary event or accident in the Company complex.

IV PERSONAL DATA PROCESSING AND STORAGE PERIOD

We use your data and keep it only for the period absolutely essential required of us by legal regulations or which we need to protect our rights. We have internal archiving rules configured that ensure that we do not hold on to data longer than we are authorised to.

In general terms we are obliged to store basic data and data about products and services on the basis of legislation, for example accountancy act or tax acts. For example, we keep invoices for 10 years from the end of the tax period in which performance occurred. Due to the need to prove the legal basis for the issue of invoices, contracts are also kept for 10 years from the end of the contract.

We keep data for a period of 3 – 5 years for the needs of our legitimate interests, in particular for the eventuality that we would have to submit evidence in a court case, this with regard to the periods of limitation according to the current Civil Code.

If we use the data on the basis of your consent, we do so only for the period for which this consent lasts, unless we have another legal ground for it.

The below table contains the concrete periods for processing of individual categories of personal data for the individual purposes.

Categories of personal data³	Purpose	Period of processing - keeping
1 Identification and contact data for contractual relations	proceedings concerning conclusion of contract	3 years from end of contract proceedings
1 Identification and contact data for contractual relations 1 Data about goods and services and delivery data 2 Payment data 3 Invoicing data	performance of concluded contract – delivery of goods, provision of services, resolution of claims, invoicing	10 years from end of effectiveness of contract, 10 years from end of accounting period which the document containing the personal data concerns
3 Payment data	identification and proving of origin of payments	10 years from end of accounting period which the document containing the personal data concerns
4 Invoicing data	issue of accounting or tax document, keeping of accounts, payment of tax	10 years from end of accounting period which the document containing the personal data concerns
10 Data for marketing purposes	sending of commercial messages by email to existing customers of the Company about the same or similar products or services of the Company	3 years from the last provision of our service or purchase of our goods
10 Data for marketing purposes	other than the aforementioned marketing of products or services	for the period for which the consent had been granted to us legitimately - as standard 3 years we keep the actual consent and change or withdrawal of consent for the reason of our legitimate interests for the entire duration of consent and for 5 years after it has expired
1 Identification and contact data for contractual relations 2 Data about goods and services and delivery data 3 Payment data 4 Invoicing data 5 Data from communication between the Company and	recovery of receivables, protection against claims of other persons	10 years from end of accounting period which the document containing the personal data concerns. If the guarantee period or claims proceedings are longer, the Company keeps documents and data for the duration of this period or as long as these proceedings last.

³ The numbers of the personal data categories given in this column correspond to the numbers of the categories given in article II of this Policy.

the customer		If the document applies to an as yet unsettled debt or not performed undertaking, the Company will keep the documents and data up to the end of the first accounting period following the accounting period in which the debt was settled or the undertaking was performed.
11 Data for proceedings about contract of employment	recruitment of new employees in the Company	for duration of proceedings about contract of employment, longer only if the candidate so requests
6 Camera recordings from Company premises	preventing the incidence of damage recovery of receivables, protection against claims of other persons	for a maximum of 7 days from the date of video recording, After the period of keeping the recordings are erased by over-recording on a loop.
7 Data gained during registration on web sites	use of Company web sites	for duration of registration
8 Cookies – information gained using cookies placed by the Company	implementation of transfer of electronic communication, or for provision of service via Company web sites, or for measuring the traffic to Company web sites	for period given in Information about use of cookies
9 Database of customers and suppliers	communication, performing contracts, concluding new contracts, dealing with claims and servicing	10 years from end of performance of contract If the guarantee period or claims proceedings are longer, the Company keeps this data for the duration of this period or as long as these proceedings last.
12 Data about visits to company premises	protection of Company assets safety, protection of health and assets	up to the end of the month following the visit – in the case of an extraordinary event, up to the end of the investigation by the police, court or insurance company

V SOURCES OF PERSONAL DATA

We process data which we have received from you and also data from publicly accessible sources and registers, such as the Trades Register, and data from third parties.

VI RECIPIENTS OF PERSONAL DATA

During its activities the Company uses the expert and specialised services of third parties. If these suppliers process personal data for the Company in the sense of the Regulation, they have the status of personal data processors and process the personal data only on the basis of the contract and according to the instructions from the Company, and they must not use it otherwise. If the recipients process personal data for themselves (they have resources designated by the purposes of processing), they have the status of independent personal data controllers.

Your personal data may be passed on to these recipients:

- shippers,
- companies managing and recovering outstanding receivables,
- legal representatives, notaries, bailiffs,
- auditor,
- banks, insurance companies,
- Company sales representatives.
- IT systems administrator (company SAITECH s.r.o.^[Ltd], having its registered seat at the address Havlíčkova 125, 411 55 Terezín, Czech Republic, business ID No: 25010352, company KS - program, spol. s r.o.^[Ltd], having its registered seat at the address Rokytnice 153, Rokytnice, 755 01 Vsetín, Czech Republic, business ID No: 43963617, ALTEC a.s.^[joint stock company], having its registered seat at the address Poděbradova 2014, 544 01 Dvůr Králové nad Labem, Czech Republic, business ID No: 13584421, IFS Czech s.r.o.^[Ltd], having its registered seat at the address Budějovická 778/3a, Michle, 140 00 Praha 4, Czech Republic business ID No: 26166062)
- the joint stock company MS UTILITIES & SERVICES a.s. having its registered seat at the address Bezručova 1200, 735 81 Bohumín, Czech Republic, Business ID No: 29400074, which provides the Company with services in the field of purchasing, IT and security.

We select each subject carefully. Companies with their registered seat on the territory of the Czech Republic or in an EU Member State may be recipients of personal data. We do not pass on your personal data to recipients and processors outside the territory of the European Union.

In the context of performing its statutory obligations the company also passes on personal data to administrative bodies and authorities designated by valid legislation because some public authorities and other organisations are authorised to require information about you. These are in particular courts, the Police of the Czech Republic and others. So we provide data only if the law permits authorisation to demand this data.

Recordings from the camera system are passed on only in cases where this is imposed on the Company by the law or on its basis (making data accessible to criminal investigation and prosecution authorities or administrative bodies for the purposes of misdemeanour proceedings etc.).

VI MEANS OF PERSONAL DATA PROCESSING

The Company processes personal data manually (on paper) and automatically via IT systems.

VII INFORMATION ABOUT RIGHTS OF DATA SUBJECTS IN CONTEXT OF PROCESSING

We process your data transparently, properly and in compliance with the law. You have a right to access to your data, to explanations, and other rights if you feel that the processing is not correct.

You can assert all of your rights given below, objections and requirements (naturally with the exception of the right to lodge a complaint with the Personal Data Protection Office, which you can only assert at this office):

1. by letter delivered to the address of the Company's registered seat
2. by email to the address: gdpr@ghh-bonatrans.com
3. via the form on the internet pages of the Company <https://www.ghh-bonatrans.com/en/personal-data/>.

If you assert any of your rights, and we have reasonable doubts about your identity, we can ask for the provision of additional information essential for its confirmation.

If you assert a right, request or objection, if your request is justified, we will adopt measures commensurate with it without delay and at the latest within one month of the delivery of your request. Otherwise in the same period we will inform you of the reasons for not adopting the measure and about the possibility to lodge a complaint with the supervisory authority and apply for judicial redress. This period can be extended by a further two months if needs be and with regard to the complexity and number of requests. In such a case we will inform you of any extension within one month from receiving the request along with the reasons for this deferral.

If you submit the request in electronic form, we will also provide you with information in electronic form if possible, unless you request another method.

Information and all announcements and acts are provided and performed free of charge. If your requests are evidently unjustified or excessive, we may require of you a commensurate fee reflecting the administrative costs associated with the provision of the required information or announcements or performance of required acts, or we may refuse to accede to the request.

This concerns the following rights:

1 RIGHT TO ACCESS TO PERSONAL DATA

If you ask us, you will receive from us a confirmation about whether we process your personal data, and if so, also:

- a copy of your personal data that we have,
- information about:
 - o the purposes for which we process it,
 - o categories of processed personal data,
 - o recipients to whom your personal data was or will be made accessible,
 - o planned period of processing (keeping) of your personal data,
 - o about the existence of the right to demand of us rectification or erasure of your personal data, restriction of its processing or to object to this processing,
 - o the right to lodge a complaint with a supervisory authority,
 - o about all available information, about the personal data source if we did not obtain it from you,
 - o whether automatic decision-making, including profiling, is taking place,
 - o about suitable guarantees should we send your personal data outside the EU (which we, however, do not do).

2 RIGHT TO RECTIFICATION OF INACCURATE DATA

You have the right to warn us of inaccurate, outdated or incomplete personal data. Naturally in such a case we will rectify it. Until we verify the accuracy of your data we will restrict its processing (see point 4 below). With regard to the purposes for which your data is processed, you also have the right for us to complete incomplete data.

3 RIGHT TO OBJECT TO PERSONAL DATA PROCESSING

You may object at any time to the processing of your personal data which we use for the reason of our legitimate interest.

Until such time as it is verified that we have serious legitimate reasons for the processing of your personal data, we restrict its processing, unless such processing is necessary for the establishment, exercise or defence of legal claims. If it is seen that we do not have reasons for the processing of your personal data, we will erase your personal data, unless you require its preservation.

At any time you can object to the processing of your personal data which we process for the reason of direct marketing, and we will terminate the use of your personal data for these purposes.

4 RIGHT TO RESTRICTION OF PROCESSING

In some cases we are obliged to restrict the processing of your personal data. This means that your personal data will be saved with us, and we will not be able to handle it in any way unless you give us consent to it or it is essential for the establishment, exercise or defence of legal claims or for the reason of protection of the rights of a another natural or legal person.

We are obliged to start restricting the processing of personal data if:

- you contest the accuracy of the personal data, for the period enabling us to verify the accuracy of the personal data;
- it becomes evident that the processing of your personal data is unlawful, and you reject its erasure, and instead demand of us a restriction of its use;
- we no longer need your personal data, but you ask us to keep it for the establishment, exercise or defence of legal claims.
- you object to the processing of your personal data for the purposes of our legitimate interests, until it is verified whether our legitimate reasons for the processing of your personal data override your legitimate reasons for this data to be erased.

5 RIGHT TO ERASURE

You have the right to erasure of personal data applying to you if:

- your personal data is no longer necessary for the purposes for which it was gathered or otherwise processed;
- you withdraw the consent on the basis of which the data was processed, and there exist no other legal grounds for processing;
- you object to the processing of your personal data for the purposes of our legitimate interests, and it becomes evident that our reasons for processing are not serious;
- you object to the processing of personal data for direct marketing;
- the personal data was processed by us unlawfully;
- the personal data must be erased for compliance with a legal obligation that the law imposes on us;
- the personal data was gathered in the context of the offer of information society services to a child.

But we point out that there are cases where we do not have an obligation to erase your personal data (even if one of the above conditions is met), for example if we need the data for the establishment, exercise or defence of legal claims.

6 RIGHT TO PERSONAL DATA PORTABILITY

If we process your personal data automatically (i.e., using information technology) on the basis of a contract or your consent, and you ask us for it, we will transmit to you your personal data that you have provided to us in a structured, commonly-used and machine-readable format. If you want, we will transmit this data to another controller who you designate if technically feasible.

If through the exercise of this right there could be an infringement of the rights and freedoms of third parties, it is not possible to comply with your request.

7 RIGHT TO WITHDRAW CONSENT TO THE PROCESSING OF PERSONAL DATA

In cases where we need your consent for the processing of your data, you are authorised to withdraw this consent at any time. Withdrawal of consent has no impact on the processing of your data for the period for which this consent was validly granted, nor on the processing of your data for other legal grounds if they are applied (for example, compliance with legal obligations or for the purposes of our legitimate interests).

8 AUTOMATED INDIVIDUAL DECISION-MAKING, INCLUDING PROFILING

You have the right not to be subject to a decision based solely on automated processing, including profiling, which would produce legal effects concerning you or would similarly significantly affect you.

The Company does not perform automated decision-making without influence of human evaluation with legal effects for data subjects.

9 RIGHT TO APPLY TO PERSONAL DATA PROTECTION OFFICE

If you feel that the regulation or some other law has been breached by the processing of your personal data, you have the right to apply to the Personal Data Protection Office (www.uoou.cz) and lodge a complaint with it.

10 RIGHT TO RESTRICT OR CANCEL MARKETING MESSAGES

If you have granted us consent for marketing, or for some other reason commercial offers are sent to you from us, you can withdraw your consent at any time or unsubscribe from the sending of offers in the following ways:

- our commercial messages directly include the possibility of stopping their sending,
- if you no longer wish us to telephone you, tell us during a call,
- you can also inform us in at our branch or in writing that you no longer wish to receive offers.

We would like to point out that if you restrict marketing, we may still contact you for the purposes of servicing, claims and the provision of services which you have ordered.

VIII DATA PROTECTION OFFICER

The company has not appointed a data protection officer.