



PERSONAL DATA PROTECTION POLICY

We are a medium-sized fast-growing company that processes personal data not only of our employees, but also of suppliers, customers and co-operants. We are also in contact with a number of other persons - consultants, persons from state and public authorities, etc. Therefore, the following applies to us:

- EU Regulation 2016/679 of 27 April 2016 - General Data Protection Regulation (GDPR). .
- Act No. 110/2019 Coll. on the processing of personal data.
- Act No. 111/2019 Coll., Amending certain acts in connection with the adoption of the Personal Data Processing Act.

Our goal is to provide employees and partners with the security of their personal data and prevent their misuse. Therefore, we have adopted a privacy policy with the following motto:

VINOLOK, a.s. is a guarantee of personal data security of employees and business partners.

We fulfill this basic motto by focusing on the following principles:

1. Personal data security management system

- a) We implement the protection of personal data as a comprehensive system with linked management documents (policy, a chapter of the IMS Manual, manuals) and records.
- b) We have included the protection of personal data as an integral part of the Integrated Management System (IMS).

2. Employees

- a) We keep only the necessary records of our employees for the performance of the personnel and payroll agenda.
- b) Employees know what information we collect and, if necessary, express their consent.

3. Business partners

- a) We collect only records necessary for the business activities (purchase - cooperation - sale) of the specific persons of our business partners.
- b) Our partners are reminded that we adhere to the privacy policy and require the same from them.

4. Security of personal data in the PRECIOSA Group

- a) We share basic contact data of people in the group according to the rules set by Preciosa, a.s.
- b) The contractual administrator of our information technologies is PREGIS, a.s. Where this company acts as a processor of our data, we also conclude an agreement to protect the personal data of our employees or other persons.

In Jablonec nad Nisou, March 4th 2020



Ales Urbanek, CEO



Information about Personal Data Protection

Pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“GDPR”) Pursuant to EU 2016/679 **VINOLOK, a.s.**, a company with a seat at Opletalova 3197/17, 466 01 Jablonec nad Nisou, business ID No.: 06812759, tax ID No.: CZ06812759 (“Data Controller”), informs you that it will process your personal data (“OU”) to this extent: name, SURNAME, address, e-mail address, telephone No., or any further PD if you provide it to the Data Controller or if the Data Controller obtains the same in a legal way, in order to fulfil a contract, to take measures before making a contract, to comply with a statutory duty or on the grounds of the legitimate interest of the Data Controller or a third party, including but not limited to the interest to achieve the below Purposes, or on the basis of your consent provided it has been given by you (“Legal grounds for processing”). PD are data used for addressing another or identification.

Having regard to the sale of services or goods, and also in the event that you give consent with receiving commercial communications, the Data Controller will continue to process PD in order to send commercial communications, news, promotional campaigns providing information about the services and goods of the Data Controller and its subcontractors.

The Data Controller wishes to inform you that PD will be processed for the following purposes: processing of commercial offers, conclusion of contracts, fulfilment of contracts and purpose related thereto, marketing activities of the Data Controller, processing of complaints, identification and recording of business partners, keeping a register of contracts, invoicing, communication with business partners (“the Purpose”) based on any Legal ground for processing. The Data Controller wishes to inform you that the following categories of recipients belong to the further recipients of your PD: the other companies organized within the PRECIOSA Group with which we share PD on the grounds of our legitimate interest to maintain the synergy of our concerted activities; accounting, tax, legal and other advisors of the Data Controller; auditors, suppliers of services to the Data Controller, such as providers of IT services, carriers, holders of a postal service license, and PD processors who process personal data for the Data Controller according to its instructions and who concluded a personal data processing contract with the Data Controller (“Data Processor”). The Data Controller wishes to inform you it will process PD during the contractual relationship with you. Upon its termination, your PD will be accessible only by a limited number of people until the statutory bar of the right under the Contract and for the time for which their archiving is required under the law. If no contractual relationship has been created between you the Data Controller, your PD will be processed for the time necessary for achieving the Purpose, and if your PD is to be processed by us on the basis of your consent, it will be processed until you revoke your consent.

The Data Controller wishes to inform you that you have the right (i) to obtain from the Data Controller access to k PD, (ii) rectification of PD, (iii) erasure of PD, (iv) restriction of PD processing, (v) to object to PD processing (vi) to portability of PD (i.e. to obtain from the Data Controller PD in a structured, commonly used and machine-readable format and to hand them over to another data controller). The Data Controller further wishes to inform you that (i) your consent may be revoked, if you provide your PD with consent, (ii) it is





possible to lodge a complaint about processing with the Office for Personal Data Protection (Úřad na ochranu osobních údajů) at this address: Pplk. Sochora 27, 170 00 Praha 7, Czech Republic, official website [www: https://www.uoou.cz](https://www.uoou.cz), (iii) provision of PD is not your duty and (iv) there is not automated decision-making process or profiling in place. The Data Controller further informs you that you have the right to obtain from the Data Controller confirmation about whether PD are or are not processed, or to obtain copies of processed PD. Requests, complaints, and documents in which you will exercise your rights can be sent to the registered office of the Data Controller or to this e-mail address: gdpr@vinolok.com.

The Data Controller wishes to inform you in detail that you have the right to the erasure of your PD if (i) your PD are no longer necessary for the Purpose, (ii) you revoke your consent and there is no other legal ground for the processing, (iii) you object to the processing of PD processed on the grounds of the legitimate interest of the Data Controller, (iv) PD have been processed unlawfully, (v) PD must be erased in order to comply with a duty, and (vi) PD were gathered in connection with commercial communications.

The Data Controller expressly points out your right to object, at any time, to (i) the processing of PD which regard you and which were obtained on the grounds of the legitimate interest of the Data Controller or a third persons, which applies but is not limited to profiling based on such grounds or (ii) processing of PD for direct marketing. The Data Controller also informs you that you have the right not to be the subject matter of any decision which would be based only and exclusively on automated processing, including profiling, which has legal effects on you or which affects you substantially, unless such processing is necessary for the fulfilment of a contractor is based on express consent.





What are cookies?

Cookies are small text files which are stored on your computer or mobile device by websites at the moment you visit them. The websites then remembers, for a certain time, your preferences preference and activities you made on them (e.g. login information, language, font size and other imaging preference), allowing you not to have to enter the same information during the next log-in.

How do we use cookies?

Storing your preferences and settings

We use cookies to store the preferences and settings which you make during your visit.

Logging into your customer account

We use cookie files with limited validity to facilitate your logging into our website.

Analysis

We use cookie files to collect information about the performance and operation of our website and other online presentations. The cookie files which are used for traffic analysis and statistics enable us to identify unique web users. However, they are not connected in any way with yourself or your IP address. This also applies to cookie files from the providers of analytical tools.

As serving and advertisement targeting

We use cookie files in order to target advertising to the products in which you were interested in the past. 'Interest' means, e.g. browsing through the catalogue of a specific product on a website.

