

**Information on the processing of personal data  
of customers/ contractual partners  
in connection with the sale of goods and provision of services  
and with eventual marketing activities  
of the company BenThor automation s.r.o.**

**1. Business activities of the company BenThor automation s.r.o.**

- 1.1** The business activities of the company BenThor automation s.r.o., ID No.: 03676234, with its registered office at Konviktska 291/24, Stare Mesto, 110 00 Praha, in the commercial register administered by the Municipal Court in Prague in Section C insert 235982 (hereinafter referred to as “BenThor automation s.r.o.”) include primarily production, trading and provision of services in Annexes 1 to 3 of the Trade Licence Act; production, installation and repair of electrical machines and devices, electronic and telecommunications equipment; assembly, repair, revision and testing of electrical equipment; rental of real estates, apartments and non-residential premises.
- 1.2** Marketing activities to promote the company and its goods and improve the services of customers/ contractual partners are also an integral part of business activities, within which personal data of customers and contact details of contractual partners are also processed.

**2. Controller or processor?**

- 2.1** The company BenThor automation s.r.o. is the controller of personal data.  
The company BenThor automation s.r.o. is further also referred to as “our company” or “we”.
- 2.2** Our company informs that it is not obliged to appoint a personal data protection officer in the sense of the GDPR regulation. If the need for such an appointment arises, our company will inform its customers and business partners about it in time.
- 2.3** Please direct questions concerning the processing of your personal data to/at the e-mail address [info@benthor.tech](mailto:info@benthor.tech).

**3. What do we have to fulfil in order to be able to process your data?**

- 3.1** Our company, as a personal data controller, is obliged, when processing personal data, to comply with the obligations arising from the Regulation of the European Parliament and the Council (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR) as well as from the law on the processing of personal data (hereinafter referred to as “**applicable legal regulations**”). Our company regularly checks the compliance of its procedures with applicable legal regulations and approaches the fulfilment of these obligations responsibly, with an emphasis on preserving the privacy of natural persons and the protection of their data. At the same time, it also ensures the necessary protection by third cooperating persons who, in connection with the processing of personal data, act or may act as administrators of personal data, or their following controllers, processors or recipients of personal data.

#### 4. What data do we process and what purposes for?

- 4.1** Basic contact personal data and contractual data of our customers, contractual partners and potential customers are processed for the purpose of managing the contractual relationship and fulfilling obligations arising from the business relationship.
- 4.2** Personal data are further processed for the purpose of fulfilling legal obligations, especially tax obligations, obligations towards other administrative or judicial authorities, towards control authorities, etc.
- 4.3** Personal data is also processed on the basis of the legitimate interest of our company, in particular in connection with the enforcement of legitimate claims of our company, support of business activities, marketing activities and management of business relations within the group of which our company is a part.
- 4.4** Our company processes personal data of contractual partners and customers specifically for the following purposes:
- a) negotiating the conclusion or amendment of the contract;
  - b) fulfilment of the contract and provision of services;
  - c) fulfilment of the obligations imposed by law in connection with the given contract, if the legal regulations assume the fulfilment of such obligations;
  - d) settlement of contractual claims and fulfilment of payment obligations;
  - e) fulfilment of accounting and tax obligations;
  - f) debt collection and other claims through courts or other independent institutions;
  - g) assessment of customers' ability to pay;
  - h) basic customer contact;
  - i) offering similar products and services;
  - j) marketing activities, in particular keeping customer records, marketing surveys, customer satisfaction surveys, sending information messages about news regarding the administrator's activities, etc.).
- 4.5** The personal data of potential customers or contractual partners are processed for the purpose of future contractual relations and the sale of goods or services by our company.
- 4.6** As a personal data controller, our company maintains an electronic database (CRM system) in which it records the basic personal and contact data of customers/ business partners or potential customers and evaluates their purchasing behaviour in order to provide individualized offers for the purchase of products and services.
- 4.7** Personal data of customers are also processed as part of the bonus system, special offers, promotions, etc.
- 4.8** Personal data of customers, business partners and potential business partners are processed within the CRM system to the following extent:
- identification data: name, surname, date of birth or birth number, nationality;
  - contact details: permanent address, correspondence address, phone number, e-mail address;
  - other personal data: bank account details.

- 4.9** The following data of legal entities or self-employed natural persons is processed:
- identification data: company name, first name, last name, date of birth or birth number, if it serves as an identifier within the TIN/VAT; identification number, registered office, place of business, registration number under which the person is registered in the commercial register;
  - contact details: correspondence address, phone number, e-mail address;
  - other data: bank account number, name and surname of a contact person/ account manager, his/her phone number, e-mail address or another contact detail; job position.
- 4.10** For the purpose of marketing promotion of our company and of improving our services, customers/ business partners and future business partners are also sent commercial communications (newsletters, discount and special offers, satisfaction surveys, invitations to events, etc.) to the electronic addresses provided by them obtained in connection with the purchase of goods and services or based on the consent provided. The customer/ contractual partner has the right to refuse the sending of commercial communications at any time simply and free of charge, of which he/she is informed in each commercial communication.

## **5. How does the data get into our database?**

- 5.1** We obtain new data for our database (CRM system) directly from our customers/ contractual partners and from the ARES web application of the Ministry of Finance.
- 5.2** Into our customer database we enter data:
- a) obtained from concluded contracts (where our company is a party to the contract);
  - b) obtained directly from customers and business partners;
  - c) obtained directly from potential contractual partners with their consent – in particular when requesting the processing of a business or service offer (whether by the activities of sales representatives during their visits, during sales events, or based on e-mail or telephone inquiries from customers).

## **6. Which entities/persons have access to your personal data and to whom do we pass them on?**

- 6.1** All personal data is processed by our company as controller.
- 6.2** With regard to the necessary cooperation and synergies within the concern and shared management systems, the personal data of customers/ contractual partners is also made available to the companies of the Chropyňská Group.
- 6.3** The customer database is not shared with another personal data controller.
- 6.4** To a limited extent, we may share processed personal data with processors who provide certain services for us, such as:
- processing of the accounting and tax agenda;
  - provision of invoicing services;
  - law offices;
  - system support from the parent company or another company of the group;
  - support in marketing activities (sending out letters, emailing, customer satisfaction survey, market research, managing customer telephone and email lines, evaluating purchasing behaviour and similar marketing activities).

- 6.5** We may also share contact information of customers and contractual partners with companies that provide transport, storage or inspection of goods, collection and disposal of unconsumed goods and packaging for us, or with contractual insurance company, but only to the necessary extent and for the necessary period.
- 6.6** We provide IT services related to data processing by ourselves using our employees, in order to maximize the protection of data and your privacy. The IT department of external IT service providers may have access to personal data for the purpose of backing up and archiving data and ensuring the functionality and update of the IT system used in the concern. In such a case personal data is processed in the EU.
- 6.7** The processing of personal data can be carried out by processors exclusively on the basis of the contract on the processing of personal data with our company i.e. with guarantees of organizational and technical security of these data and with the definition of the purpose of processing, whereby the processors must not use the data for any other purposes.
- 6.8** Personal data may be made available in connection with the fulfilment of legal obligations within the framework of the synergy with administrative authorities, in particular law enforcement authorities, control authorities, as well as courts, executors, insolvency administrators, etc., always only to the extent stipulated by law and based on their legitimate call.

## **7. How long do we store your personal data?**

- 7.1** We keep the data of the contractual partners in the database for the entire duration of the contractual relationship in order to be able to fulfil the contract and the resulting contractual obligations and exercise the resulting rights. For the purposes of fulfilling the contract, we may process the necessary personal data even without the consent of the data subject. For the purposes of archiving and the fulfilment of legal archiving and control obligations and the enforcement of our company's legitimate claims, we retain the personal data of data subjects for at least another 10 years after the termination of the contractual relationship. If a shorter period is established by law for the fulfilment of archiving or control obligations, especially in relation to the tax office, the data is kept for this shorter period established by law.
- 7.2** We process data that we obtain with your consent or that are kept in the CRM system for the duration of the contract/ your consent. In the event of withdrawal of your consent, personal data will continue to be stored and processed if this is necessary for the effective enforcement of the legitimate claims of the contracting parties, or if such an obligation results from legal regulations.
- 7.3** If the purpose of the processing passes, all the data of the data subjects, or data that served the given purpose, are deleted from our database.

## **8. What rights do natural persons have in relation to the processing of their personal data?**

- 8.1** A natural person, who is the data subject, has the right:
- to access his/her personal data according to Article 15 of the GDPR;
  - to obtain the rectification of inaccurate personal data according to Article 16 of the GDPR;
  - to obtain the erasure of his/her personal data according to Article 17 of the GDPR;
  - to object to processing according to Article 21 of the GDPR;
  - to restrict the processing of his/her personal data according to Article 18 of the GDPR;
  - to data portability to the extent established by applicable legal regulations according to Article 20 of the GDPR;
  - to lodge a complaint with the Office for Personal Data Protection (Úřad pro ochranu osobních údajů, further details at [www.uoou.cz](http://www.uoou.cz)) in the case your rights arising from applicable legal regulations have been violated.

- 8.2** If you have any questions or require an explanation regarding the protection of personal data, please contact us at [info@benthor.tech](mailto:info@benthor.tech) or by phone +420 326 211 161.

## **9. The consequences of a failure to supply personal data**

- 9.1** Failure to provide personal data results in the impossibility of concluding a contractual relationship and the consequent impossibility of fulfilling contractual obligations. Consent to the processing of personal data, if this is provided by you, can be revoked at any time free of charge at [info@benthor.tech](mailto:info@benthor.tech) or by phone at +420 326 211 161 or in writing to our company address.
- 9.2** If consent to the processing of personal data is revoked in connection with the marketing activities of our company, the provision of services or benefits for which the given consent was granted will be terminated at the time of its revocation.

## **10. Transmission of personal data outside the European Union**

- 10.1** The personal data is not transmitted to third entities registered outside the European Union.

**BenThor automation s.r.o.**