

PRINCIPLES OF PERSONAL DATA PROTECTION

In these Principles of Personal Data Protection we inform the subjects of data whose personal data we process about all our activities regarding processing and principles of protection of privacy of these subjects. These Principles are integral part of our General Business Conditions, and thus Contract.

1. Responsible persons

Data Protection Officer:

Autonapúl, družstvo, IČ 29301751, Údolní 567/33, 602 00 Brno
(thereafter „Autonapúl“, „we“, „our“ or „us“)

Contact Person of Data Protection Officer:

Name: Michal Šimoník
Phone Number: +420 608 468 579
E-mail: simonik@autonapul.cz
(thereafter „contact person“)

2. Definitions

GDPR: 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, thereafter “GDPR”).

Personal data: By Personal data we understand all information about identified or identifiable natural person (“data subject”) according to GDPR

Specific personal data: By specific personal data we understand any data about racial or ethnical origin, political opinions, religious or philosophical beliefs, or trade unions membership, and the concerning natural person’s sex life or sexual orientation.

Data subject: By data subject we understand an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing of personal data: By processing of personal data in accordance with article 4, paragraph 2 of GDPR we mean any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Controller: By controller according to Article 4, paragraph 7 of GDPR we mean the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law, i.e. also Autonapúl.

Processor: By processor according to Article 4, paragraph 8 of GDPR we mean a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller, i.e. also some business partners of Autonapúl, who under our instruction, or instruction of our employee process personal data for Autonapúl.

Supervisory authority: Supervisory authority in the Czech Republic is The Office for Personal Data Protection (thereby UOOU)

Risky processing: By risky processing we mean any processing which probably implies the risk for rights and freedoms of data subject, processing is not occasional, which includes processing of special categories of data or processing of personal data related to criminal convictions and offences referred to in Article 10 of GDPR.

3. Processed Personal Data

We process identification, contact, accounting, salary data, records of correspondence, and occasionally picture records or special categories of personal data of data subjects, and identification data of family members of data subjects in accordance with GDPR and the bill of law No. 101/2000 Coll., about personal data protection, as amended.

4. Categories of Personal Data

- a) Our customers.
- b) Our potential customers.
- c) Employees, persons performing service for us base on contract different than labour contract, members of the cooperative.
- d) Job applicants.
- e) Our collaborators (external collaborators, namely natural persons undertaking under Czech law, who provide services to us).
- f) Our creditors.

5. Purpose of Processing of Personal Data

Personal data are processed for specifically determined purpose:

Categories of Personal Data	Purpose of processing of personal data	Legal basis and description	Time limits of processing
Our customers	Keeping of database of our customers	<ul style="list-style-type: none"> Legal basis is fulfilment of legal obligation Keeping of the database with identification and accounting personal data of our customers is necessary for fulfilment of obligations according to Accounting Act 563/1991 Coll., as amended, Income Tax Act 586/1992 Coll., as amended and Value Added Tax Act 235/2004 Coll, as amended. 	For this purpose, personal data may be processed for the duration of contractual relation and for the period determined by law.
Our customers	Position tracking of the vehicles in case of suspected criminal activity, in case of suspected risk of serious damage for Autonapůl etc.; publication of the location of the vehicle after finishing of Reservation ¹ for future Reservations by customers	<ul style="list-style-type: none"> Legal basis is our legitimate interest Processing of the location of our vehicle used by our customer is necessary for prevention of criminal activity or damage, if there is suspicion for such an activity. In normal course of events we do not track and do not record data on the actual location of our vehicles and data on their route during Reservation; only when finishing the Reservation, the actual location of the vehicle is published in the Reservation system. 	For this purpose, personal data may be processed for the period of one week or for the period when suspected activity lasts.
Our customers Our collaborators Our creditors	Fulfilment and realization of contracts with customers, external collaborators and creditors, recovery of receivables.	<ul style="list-style-type: none"> Legal basis is fulfilment of contract. Processing of identification and accounting personal data of parties of contracts is necessary for fulfilment of mutual contractual obligations. Processing of data on traffic offences according to Road Traffic Act No. 361/2000 Coll., as amended, is necessary for recovery of our receivables arising from these violations. 	For this purpose, personal data may be processed for the duration of contractual relationship.
Our customers Our collaborators Our creditors	Claims arising from contractual relations after termination of the contract	<ul style="list-style-type: none"> Legal basis is our legitimate interest The collection of identification and accounting data, including payments made, is necessary for the settlement of claims, recovery of claims and other contractual obligations under contracts between us and these data subjects. The processing of data on offenses pursuant to the Road Act No. 361/2000 Coll., On Road Traffic, as amended, is necessary for the recovery of our receivables from these offenses. 	For this purpose, personal data may be processed for a period of four years after termination of the contractual relationship, in the case of disputed proceedings throughout the proceedings.
Our customers Our potential customers	Dissemination of business messages in the form of expert information and reports,	<ul style="list-style-type: none"> Legal basis is our legitimate interest The processing of customer identification and contact data is carried out to disseminate business communications. 	For this purpose, personal data may be processed for the

¹ As defined in the General Business Conditions

Categories of Personal Data	Purpose of processing of personal data	Legal basis and description	Time limits of processing
	marketing materials, car sharing service offers, invitations to professional events		duration of the contractual relationship.
Our potential customers	Re-addressing data subjects base on a completed form or obtained during the negotiation of a contract with the customer.	<ul style="list-style-type: none"> ⊙ Legal basis is our legitimate interest. ⊙ Processing of identification and contact data of potential customers obtained a) from the form on www.autonapul.cz, b) from the contracting process, without the conclusion of a contract between the data subject and us, is carried out in order to re-address these data subjects with the offer of services. 	Personal data is kept for nine months after the form has been filled in, or since the e-mail has been received with personal data, within which we will contact the data subject in order to offer our services.
Job applicants	Assessing the suitability of the job applicant for the selection procedure and re-addressing him / her in case of termination of employment with another selected candidate in the probationary period.	<ul style="list-style-type: none"> ⊙ Legal basis is our legitimate interest ⊙ We collect identification and contact data, and education and job experience data of job applicants for the ongoing selection process and possible re-address when cancelling employment relationship with another selected candidate during a probationary period. 	Personal data are processed for this purpose for a period of six months from the cancellation of the selection procedure or from the start of another selected candidate to an advertised position as an employee.
Job applicants	Possible proof of compliance with the prohibition of discrimination and equal treatment under the Employment Act in the selection procedure for employees	<ul style="list-style-type: none"> ⊙ Legal basis is our legitimate interest ⊙ We collect identification and contact data and data on the education and work experience of job applicants in order to demonstrate the compliance of the recruitment procedure with the provisions of the Employment Act on non-discrimination and equal treatment obligations. 	Personal data are processed for this purpose for a period of three years from the end of the selection procedure.

6. Time Limits of Processing of Personal Data

Personal data are kept only for the time necessary for the purpose of processing - see table above. After this time, personal data may be retained for the purposes of the State Statistical Service only, for scientific and archival purposes.

7. Recipients of Personal Data and Transfer of Personal Data Outside the European Union

In justified cases, we may also transfer your personal information to other entities (the "recipients"). **We never pass on your personal information to third parties for marketing purposes.**

Personal data may be transmitted to the following categories of recipients:

- **processors** who process your personal data according to our instructions (service providers, suppliers, ICT providers, external collaborators):
 - External collaborator Autonapúl, who provides services in the area of marketing activity management, communication with potential and existing customers, and possibly other services necessary for car sharing system operation;
 - Providers of systems and facilities for our services have access to your personal data to manage and support systems and devices. In the case of the Heroku service (part of the Sales Force group, www.heroku.com), whose software we use for the Autonapúl internal information system, it is possible for the purpose of administration and support to be handed over to the United States of America, while the company is involved in the so-called Privacy Shield, valid on the basis of Commission Decision 2016/1250 of 12 July 2016. Similarly, for Convadis AG (www.convadis.ch), which supplies hardware and an IT support system to us, the management and technical support for the system of car sharing, transfer of personal data is possible to Switzerland on the basis of Commission Decision 2000/518 of 26 July 2000;
 - When you visit our web site, cookies are stored on your computer through Google Analytics and Facebook Pixel, and we pass the data necessary for these services to Google or Facebook companies. We use both services to compile statistics on the effectiveness of our ads and statistics on traffic to our web site, and all data is anonymized;
- **public authorities** and other entities, if required by applicable law;
- **other** entities in the event of an unexpected event in which the provision of data is necessary for the purpose of protecting life, health, property or other public interest or if it is necessary to protect our rights, property or security.

7. Principles of processing of personal data

Legality

We process your personal information in accordance with applicable law, especially with GDPR.

Data subject consent

We process personal data only in the manner and to the extent that you have given us consent if the consent is the title of processing.

Minimization and limitation of processing of personal data

We process personal data only to the extent that it is necessary for the purpose of its processing and for no longer than is necessary to achieve the purpose of its processing.

Accuracy of processed personal data

We process personal data with emphasis on their accuracy using available measures. And using reasonable resources, we process updated personal information.

Transparency

Through this Policy and contact person, you have the opportunity to learn how we process your personal data, as well as its scope and content.

Purpose restriction

We process personal data only to the extent necessary for the fulfilment of the intended purpose and in accordance with that purpose.

Safety

We process personal data in a manner that ensures its proper security, including its protection by appropriate technical or organizational measures against unauthorized or unlawful processing and against accidental loss, destruction or damage.

8. Automated individual decision making and profiling

Personal data processing **does not** involve automated individual decision making or profiling. Automated individual decision-making and profiling is generally understood to mean any form of automated processing of personal data to use for the assessment of certain personal aspects relating to the data subject, in particular for analysis or estimation, analysing or anticipating aspects relating to his / her work performance, economic situation, health, personal preferences, interests, reliability, behaviour, location, or movement.

9. Your rights as a data subject

Right of access to personal data

You have the right to request from us access to personal information about your person. In particular, you have the right to receive a confirmation from us that personal data concerning you are processed or processed by us and to provide further information on the processed data and the processing within the meaning of the relevant GDPR provisions (purpose of processing, category of personal data concerned, recipients, the planned duration of the record, the existence of the right to request a correction, the deletion, the limitation of the processing or the right to object, the source of personal data and the right to file a complaint). If you ask for it, we will provide you with a copy of the personal data we process about you free of charge. In the case of a repeated request, we may charge a reasonable fee for providing a copy corresponding to the administrative costs of processing. To get access to your personal data, use a contact person.

The right to withdraw consent to the processing of personal data if processing takes place on the basis of consent

You have the right at any time to withdraw consent to the processing of personal data processed by us on the basis of such consent. You can revoke your consent through a contact person.

Right of repair, restriction or deletion

If you find that personal data about you is inaccurate, you may require us to correct this data without undue delay. If this is appropriate in the light of the specific circumstances of the case, you may also request the addition of the information we have about you. You may request repair, limitation of processing or deletion of data through a contact person.

Right to deletion of personal data

You have the right to request us to erase without undue delay the personal data processed by us that concern you in the following cases:

- if you revoke your consent to the processing of personal data, and there is no other legitimate reason for our processing to prevail over Your right of deletion;
- if you object to the processing of personal data (see below);
- Your personal data is no longer needed for purposes for which we have collected or otherwise processed it;
- personal data has been unlawfully processed by us;
- personal data was gathered in connection with the provision of information society services to a person below the age of 18;
- personal data must be deleted to comply with a legal obligation laid down in European Union law or the Czech law applicable to us.

You can request a deletion in these cases through a contact person.

Right to request deletion of personal data is not given in a situation where processing is necessary:

- ⊙ for exercise of the right of freedom of expression and information;
- ⊙ for meet our legal obligations;
- ⊙ on grounds of public interest in the field of public health;
- ⊙ for purposes of archiving in the public interest, for purposes of scientific or historical research or for statistical purposes, where the deletion of data is likely to make it impossible or seriously jeopardized to achieve the objectives of that processing;
- ⊙ For the determination, exercise or defence of legal claims.

Whether there are reasons for not using the right to erase can be found through a contact person.

The right to limit the processing of personal data

You have the right to restrict the processing of your personal data in the following cases:

- ⊙ you deny the accuracy of your personal data. In this case, the limitation is valid for the time required to verify the accuracy of personal data.
- ⊙ processing is illegal, and you do not want to delete your personal data and instead you want to limit their use.
- ⊙ We no longer need your personal data for the purposes for which we processed it, but you required these data to identify, exercise or defend legal claims;
- ⊙ you object to the processing (see below). In this case, the limitation applies for a period until it is verified that the legitimate reasons on our behalf outweigh your legitimate reasons.

At a time when we limit the processing of personal data, we may only process your personal data (with the exception of its storage) only with your consent or for the purpose of determining, enforcing or defending our legal rights to protect the rights of another natural or legal person or for reasons of major public interest of the European Union or a Member State. As mentioned above, you can request processing restrictions through a contact person

Right to object to processing

You have the right to object to the processing of your personal data in the following cases:

- ⊙ In the case that personal data are processed because processing is necessary to fulfil a task carried out in the public interest or in the exercise of public authority to which we are entrusted or for the purposes of our legitimate interests and you object to the processing, we cannot continue in processing unless we can demonstrate serious legitimate processing grounds that outweigh your interests, rights and freedoms, or to determine, exercise or defend our legal rights.
- ⊙ If personal data is processed for direct marketing purposes and you object to the processing, we will no longer process personal data for these purposes.
- ⊙ If your personal data is processed for purposes of scientific or historical research or for statistical purposes, we will not process it further unless processing is necessary to fulfil a task carried out for reasons of public interest.

You can file an objection with a contact person.

Right to data portability

In the case that we process your personal data with your consent or because it is necessary to fulfil a contract between us, you have the right to obtain from us the personal data which are referring to and which you have provided us, in a structured, commonly used and machine-readable format, if personal data are processed by us in such a way. You have the right to pass this data to another data controller or to require us to provide this information directly to another data controller if this is technically feasible. Please contact our contact person to obtain your personal data.

The right not to be subject to any decision based exclusively on automated processing, including profiling

We do not currently use personal data for profiling or automated decision making. Otherwise, you have the right not to be the subject of any decision based solely on automated processing, including profiling, which has legal effects for you or you have a significant impact on you. This does not apply if:

- ⊙ it is necessary for the conclusion or performance of a contract concluded between us;

- your explicit consent was granted.

The right to obtain information about a breach of security of your personal data

If it is likely that a breach of our security will be a high risk for your rights and freedoms, we will notify you of this violation without undue delay. If appropriate technical or organizational measures have been used to process your personal data, such as making it incomprehensible for unauthorized person, or by additional measures to ensure that the high risk does not occur, we do not need to transmit the infringement information.

Right to file a complaint with the Supervisory Authority

If you believe that the processing of your personal data is in violation of the obligations set forth in the GDPR, you have the right to file a complaint with the Supervisory Authority. The Supervisory Authority in the Czech Republic is the Office for the Protection of Personal Data:

Úřad pro ochranu osobních údajů (Office for the Protection of Personal Data)

Pplk. Sochora 27

170 00 Praha 7

telefon: 234 665 111

E-mail: posta@uouu.cz

Datová schránka: qkbaa2n

www.uouu.cz

These Principles of Personal Data Protection is effective from 25 May 2018.