

# PERSONAL DATA PROTECTION POLICY

Personal data is processed only if needed and to the extent which is necessary for the purposes determined by us. Concurrently, we pay attention to the data we have available to be accurate, protected by appropriate measures, and not to be used in relation to a different purpose. The personal data is processed only for a necessary period. This document is intended particularly for you to be informed about details of the personal data processing and your rights.

## 1. Responsible persons

Data controller:

**Autonapůl, družstvo**, Company ID: 29301751, having its registered office at Údolní 567/33, 602 00 Brno  
(hereinafter referred to as “Autonapůl”, “we”, “our”, or “us”)

Controller's contact person:

Name: Stanislav Kutáček

Phone: +420 736 643 394

E-mail: kutacek@autonapul.cz

Data box: wa27896

(hereinafter referred to as the “Contact person”)

## 2. Basic terms

### Data subject = you:

The data subject means an identified or identifiable natural person; 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.

### Controller = we:

Under Article 4 par. 7 of the GDPR, the controller means a natural person or legal entity, 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. the Company as well.

**Processor:**

Under Article 4 par. 8 of the GDPR, the processor means a natural person or legal entity, public authority, agency or other body which processes personal data on behalf of the controller; i.e. some business partners of the Company which, as instructed and required by the Company, or a responsible employee of the Company, act as a data controller on behalf of the Company.

**Supervisory authority:**

The Office for Personal Data Protection (the “Office”) is a supervisory authority in the Czech Republic.

**3. Categories of data subjects, personal data being processed, purpose, legal basis and duration of processing**

We process personal data for a clearly defined purpose:

Categories of data subjects	Purpose of personal data processing	Legal basis and personal data being processed	Duration of personal data processing
Our clients	Maintenance of our client database	<ul style="list-style-type: none"> <li>• <b>Fulfilment of a legal obligation</b> provides a legal basis for the processing.</li> <li>• The database including <b>identification and accounting data of clients</b> must be maintained for compliance with Act No. 563/1991 Sb., on Accounting, as amended, Act No. 586/1992 Sb., on Income Taxes, as amended, and Act No. 235/2004 Sb., on Value Added Tax, as amended.</li> </ul>	For such purpose, personal data may be processed for the duration of a contract and for a period prescribed by law.
Our clients	Vehicle location tracking if we suspect that any criminal activity takes place, serious damage is caused to Autonapůl and the like; the location of a vehicle is disclosed after termination of the reservation for further	<ul style="list-style-type: none"> <li>• <b>Our legitimate interest</b> provides a legal basis for the processing.</li> <li>• <b>The location of a vehicle</b> used by a client must be processed for prevention of a criminal activity or prevention of damage if such activity is suspected. Under normal circumstances, we do not monitor or record data on current location of vehicles and on their routes during the</li> </ul>	For such purpose, the personal data may be processed for a period of one week or a period of suspicion of the above-mentioned situations.

	reservations of clients	reservation. The current location of a vehicle is only disclosed upon termination of the reservation.	
Our co-workers Our creditors	Performance and implementation of contracts with external workers and creditors, debt collection	<ul style="list-style-type: none"> <li>• <b>Performance of a contract</b> and in the event of electronic identification <b>performance of a contract as well as our legitimate interest for accurate identification of a counterparty</b> are a legal basis.</li> <li>• <b>Identification and accounting personal data of the other contracting parties</b> must be processed in order to perform mutual contractual obligations.</li> </ul>	For such purpose, the personal data may be processed for the duration of a contract. Data necessary only for identity verification and other circumstances of concluding a contract will be subsequently deleted.
Our clients Our potential clients	Performance and implementation of contracts concluded with clients, including their electronic identification	<ul style="list-style-type: none"> <li>• <b>Performance of a contract</b> and in the event of electronic identification, <b>performance of a contract as well as our legitimate interest for unambiguous identification of a client</b> provide a legal basis for the processing.</li> <li>• Consent provides a legal basis for keeping a photo of an ID card.</li> <li>• Data on offences under Act No. 361/2000 Sb., on Road Traffic, as amended must be processed for collection of our debts resulting from such offences.</li> </ul>	For such purpose, the personal data may be processed for the duration of a contract. Data necessary only for identity verification (e.g. a photo of an ID card) is stored until the consent is potentially withdrawn, not longer than for six months of its disclosure, the data is subsequently deleted.
Our clients Our co-workers Our creditors	Making contractual claims after termination of a contract	<ul style="list-style-type: none"> <li>• <b>Our legitimate interest</b> provides a legal basis for the processing.</li> <li>• <b>Identification and accounting data, <i>inter alia</i> data on payments made</b> must be collected for complaint handling, debt collection, enforcement of other contractual obligations from contracts concluded between us and those data subjects. Data on offences under Act No. 361/2000 Sb., on Road Traffic, as amended must be processed for debt collection resulting from such offences.</li> </ul>	For such purpose, the personal data may be processed for a period of four years of termination of a contract, in the event litigation throughout the proceedings.
Our clients	Distribution of commercial	<ul style="list-style-type: none"> <li>• <b>Our legitimate interest</b> provides a legal basis</li> </ul>	For such purpose, the personal

Our potential clients	communication in the form of professional information and messages, marketing materials, offers of car sharing, invitations to professional events	<p>for the processing.</p> <ul style="list-style-type: none"> <li>• <b>Identification and personal contact details of clients</b> are processed in order to distribute commercial communication.</li> </ul>	data may be processed for the duration of a contract.
Our potential clients	Re-addressing of data subjects based on a form filled out or data obtained during contract negotiations with a client	<ul style="list-style-type: none"> <li>• <b>Our legitimate interest</b> provides a legal basis for the processing.</li> <li>• <b>The identification and personal contact details of potential clients</b> obtained a) from a web form available at <a href="http://www.autonapul.cz">www.autonapul.cz</a>, b) during a contracting process without concluding a contract between a data subject and us are processed in order to re-address the data subjects and offer the services.</li> </ul>	The personal data is stored for six months of filling out the form or accepting an e-mail with the personal data. Within the period, we address the data subjects and offer the services.
Job applicants	Assessing the eligibility of a job applicant during a hiring process and his re-addressing if the employment of a different job applicant is terminated in a trial period	<ul style="list-style-type: none"> <li>• <b>Our legitimate interest</b> provides a legal basis for the processing.</li> <li>• We collect <b>identification, personal contact details and information on education and work experience of job applicants</b> for the purposes of a pending hiring process and for re-addressing if the employment of a different job applicant is terminated in a trial period.</li> </ul>	The personal data is processed for such purpose for 6 months of cancelling the hiring process or starting employment of a different job applicant for an advertised position.
Job applicants	Potential demonstration of compliance with discrimination prohibition and duty of equal treatment under the Employment Act during a hiring process	<ul style="list-style-type: none"> <li>• <b>Our legitimate interest</b> provides a legal basis for the processing.</li> <li>• We collect <b>identification, personal contact details and information on education and work experience of job applicants</b> in order to potentially demonstrate compliance of the hiring process with the provisions of the Employment Act on prohibition of discrimination and duty of equal treatment.</li> </ul>	The personal data is processed for such purpose for three years of termination of the hiring process.



## 4. Recipients of personal data and transfer of personal data outside the European Union

On justified grounds, we may also transfer your personal data to other entities (hereinafter referred to as the "Recipients").

The personal data may be transferred to the following categories of Recipients:

- processors which process your personal data as instructed by us (service providers, suppliers, providers of ICT systems, external workers);
  - External workers which provide us with services in management of marketing activities, communication with potential and existing clients, or other services necessary for the operation of the car sharing system;
  - ZignSec AB which provides an automatic identity verification service for potential clients stores the data necessary for identity verification (particularly photos of documents and selfie) for maximum 60 days.
  - LegalSystems, a.s., a supplier of a form for new clients
  - When visiting our website, cookies are saved into your computer through Google Analytics and Facebook Pixel and we transfer the data necessary for these services to Google, or Facebook. We use both services in order to compile statistics on the effectiveness of our advertising and to assess statistics on our website traffic and and all data is anonymised;
- insurance companies when handling insurance claims;
- public bodies and other entities if required by an applicable law;
- other entities in case of an unexpected event in which the personal data must be disclosed in order to protect life, health, property, or any other public interest, or if necessary for protection of our rights, safety, or property.

## 5. Automated individual decision-making and profiling

When processing the personal data, the automated decision-making **takes place**, and thus upon conclusion of contracts in an electronic form, i.e. it is necessary for a contract to be made.

When processing the personal data, the profiling **may take place** for the purposes of direct marketing unless you object to the processing.

## 6. Your rights as a data subject

You have the right to obtain from us **access to the personal data concerning you** under the terms stipulated in Article 15 of the GDPR.

You have the right to **withdraw at any time your consent** to the processing of the personal data that we process based on the consent under the terms stipulated in Article 7 of the GDPR.

You have the right to obtain from us the **rectification of the personal data** under the terms stipulated in Article 16 of the GDPR, the **restriction of the personal data processing** under the terms stipulated in Article 18 of the GDPR, or the **erasure of the personal data** under the terms stipulated in Article 17 of the GDPR.

You have the right to **object to the processing of the personal data** concerning you based on Article 21 of the GDPR.

You have the right to **receive the personal data and transmit those data to another controller** under the terms stipulated in Article 20 of the GDPR.

You have the right **not to be subject to a decision based solely on automated processing, including profiling**, under the terms stipulated in Article 22 of the GDPR.

You have the right **to obtain information about the personal data breach** under the terms stipulated in Article 34 of the GDPR.

If you consider that the processing of your personal data infringes the duties stipulated in the GDPR, you have the right to **lodge a complaint with a supervisory authority** under the terms stipulated in Article 77 of the GDPR. The Office for Personal Data Protection is a supervisory authority in the Czech Republic.

**Office for Personal Data Protection**

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**This Personal Data Protection Policy comes into effect on 01 December 2025.**