

Webglobe's Privacy and Data Processing Statement

The purpose of this Webglobe's Privacy and Data Processing Statement issued by Webglobe, s.r.o., with its registered office at Vinohradská 190/2405, Prague 3, Postal Code 13061, identification number: 26159708, registered in the Commercial Register kept by the Municipal Court in Prague, Section C, File 75587 (hereinafter referred to as the "Statement" and "Webglobe") is to provide you with information on how and which personal data about individuals is collected, processed, used and protected by Webglobe (as the controller).

This Statement applies to the processing of personal data of Webglobe's customers and, where appropriate, their representatives or contact persons, users of Webglobe services, prospective users of Webglobe services and visitors to websites operated by Webglobe, in each case to the extent of personal data corresponding to their position with respect to Webglobe. The Statement also applies, to the extent appropriate, to the processing of personal data of our partners, i.e., customers with whom a cooperation agreement will be concluded regarding participation in the Webglobe commission program.

Webglobe is committed to the protection of your personal data and complies with Regulation (EU) 2016/679 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 (hereinafter referred to as the "General Data Protection Regulation" or "GDPR"), as of the effective date of the Regulation, with Act No. 110/2019 Sb., on the processing of personal data, as amended and amending certain acts, Act No. 480/2004 Sb., on certain services of the information society, as amended, the Civil Code and other related legal regulations.

This Statement is issued for the purpose of ensuring the disclosure duty of Webglobe as the controller pursuant to Art. 13 or Art. 14 of the GDPR.

PERSONAL DATA

The General Data Protection Regulation defines personal data as any and all information about an identified or identifiable natural person ("data subject"); an identifiable natural person is an individual who can be identified, directly or indirectly, in particular by reference to an identifier or data. Therefore, if you enter into a contract with us for the provision of services either as an individual or as a natural person carrying out business ("self-employed person"), then you are a data subject within the meaning of the GDPR and the data we process about you constitutes personal data.

Personal data, however, **is not anonymous or aggregated data**, i.e., data that, from the outset or as a result of processing, cannot be linked to a specific person, but is the result of aggregation of a mass of individual information.

In connection with the provision of the services, Webglobe may process the following categories of personal data. However, the list of data that we provide here does not imply that Webglobe processes data about everyone to such an extent. It is only a matter of fulfilling the disclosure duty, where the scope of data is always individualised to the specific service customer, except for data that Webglobe is required by law to process.

1. Personal identification and contact details

These data are processed, inter alia, for the conclusion and performance of the contract. These include in particular:

- academic degree
- name and surname
- name of the business company
- date of birth
- Id. No., Tax Id. No.
- permanent residence address
- address of the registered office or place of business
- invoicing address
- identification details of the client's representative or a contact person designated by the client
- identification details of the bill payer
- bank
- signature
- contact telephone number
- contact e-mail
- social network addresses

2. Details of services taken and their use

- type and specification of the service provided
- volume of the services provided and their price
- customer segment

3. Operating data and location data

- data connection address (e.g., IP address or URL address)
- type of Internet connection

4. Data from communications between you and Webglobe

This includes records of personal communications or other direct contact with you, written and electronic or chat communications and records of telephone calls, primarily related to your enquiries about our services, service complaints etc. In this context, please note that telephone calls may be recorded or monitored for the purpose of improving the quality of services. You will always be duly informed of any recording or monitoring. Any processing of your personal data (in the case of call recording) for the purposes of improving the quality of services will always be carried out on the basis of our company's legitimate interest and will always be carefully assessed to ensure that your rights and freedoms are not unreasonably interfered with. Of course, you will also always have the possibility to protest against such data processing by raising an objection to the processing of your personal data.

5. Data processed for business and related purposes

The processing of this data is not strictly necessary for the performance of a contract or legal obligations or for the protection of Webglobe's legitimate interests, but the processing of this data will allow us to improve our services, to focus on what you are really interested in and, where appropriate, to inform you about offers that may be beneficial or interesting to you. This data is only processed if consent is given or if Webglobe has a legitimate interest in processing it and may be processed for as long as the consent is valid or for the duration of the legitimate interest or until an objection to such processing is raised. These include in particular:

- data about the use of the services for the purpose of sending our commercial communications (we process this data only until you object to the sending of commercial communications that we send on the basis of Webglobe's legitimate interest)
- data collected by marketing surveys (we can only process this data if you give us your consent to the processing of your personal data for commercial purposes)
- contact details in case you are not yet our customers (we process them on the basis of consent to marketing outreach)
- records of behaviour on websites managed by Webglobe obtained from cookies if cookies are enabled in your web browser (they are processed to improve the operation of our website, Internet advertising and, if you consent to the processing of personal data for commercial purposes or consent to marketing outreach, these data may be processed together with other personal data for this purpose)

PURPOSE, LEGAL BASIS AND TERM OF PERSONAL DATA PROCESSING

The purpose of the processing is decisive for the scope of the processing of your personal data. While for some purposes we may process data directly on the basis of a contract, our legitimate interest or the law (i.e., without your consent), for other purposes we must first ask for your consent.

1. When we don't need to ask for your consent

The provision of personal data necessary for the performance of a contract and the fulfilment of Webglobe's legal obligations is mandatory. We cannot provide services to you without the provision of your personal data for these purposes and therefore we do not need your consent to process your personal data for these purposes. Therefore, processing cannot be refused for the performance of a contract and the fulfilment of legal obligations. In addition, we may also process your personal data without your consent if we have a sufficient legitimate interest to do so.

Here is an overview of the most important purposes for which your consent is not required:

- provision of services specified in a contract (contract fulfilment)

- fulfilment of mutual cooperation with customers who are partners in the case of participation in the Webglobe commission programme (contract fulfilment)
- billing for services (contract fulfilment)
- compliance with statutory tax obligations (fulfilment of legal obligations)
- purposes set out by special laws for the needs of criminal proceedings and for the fulfilment of the duty to cooperate with the Police of the Czech Republic and other governmental authorities (fulfilment of legal obligations)
- exchange of data between Webglobe as the controller and other controllers to ensure interconnection and access to the ordered services (contract fulfilment)
- internal administrative needs of Webglobe, a.s. Group (legitimate interest)
- enforcement of receivables from a customer or partner and other related disputes (legitimate interest)
- recording and monitoring of calls with the customer line (legitimate interest)
- processes related to customer identification (contract fulfilment)
- securing evidence in case Webglobe needs to defend its rights (legitimate interest of the company)
- records of debtors (legitimate interest of the company)
- records of internet abuse (legitimate interest of the company)

If you order, at least once, one of our services from us and thus become our customer, we may send you, on the basis of Webglobe's legitimate interest, commercial communications that relate exclusively to our products and services similar to those you have ordered. In this case we do not need your prior consent either, but – unlike the above purposes – you can say, at any time after the conclusion of the contract, that you no longer wish to receive such commercial communications. In such case, we are obliged to accept your decision without any impact on the services provided.

We process personal data for the said activities to the extent necessary for the fulfilment of these activities and for the period necessary to achieve them or for the period directly stipulated by the legal regulations. We will then either delete or anonymise your personal data.

How long we process your personal data:

a. less than 1 year

- if you are not our customer, but you have negotiated a contract with us which has not been ultimately concluded, we are entitled to process the personal data you have provided for a period of 3 months after the negotiation in question
- you may challenge the service billing we have prepared with a claim and for this purpose we process data on the service provided for a maximum of 6 months after the service has been provided, unless a longer period is needed. Furthermore, we are entitled to process the operational data of the service until the dispute about objection to the settlement of the claim is resolved or until the claim can be legally enforced.

b. maximum of 4 years

- if you terminate your contract with us, we may process your basic personal, identification, contact data, details of services and data from our mutual communications in the customer database for a period of 4 years from the date of termination of your last contract with Webglobe, provided that you have fulfilled all your obligations to us.

c. maximum of 10 years

- Section 35 of Act No. 235/2004 Sb., on value added tax, requires us to archive all invoices issued by Webglobe for a period of 10 years from the date of issue. Due to the need to prove the legal ground for issuing invoices, all contracts relating to the provision of services and other contractual documents are also archived for a period of 10 years from the date of termination of the contract.

2. When we need your consent**· Processing of personal data with consent for commercial purposes**

Webglobe does not currently feel the need to include you in various marketing surveys or to send you commercial communications from third parties for which it would be necessary to require your consent to the processing of personal data for commercial purposes. If we decide to do this in the future, you will find a box in your user account that you can check to give us your consent to the processing of your personal data for business purposes. You will be able to revoke the thus-given consent at any time and such revocation will not affect the quality or scope of the services provided. You can revoke your consent in your user account or you can use the direct link in the sent commercial communication. Your consent will remain valid for as long as you use Webglobe products and services and for the period of 4 years thereafter or until you revoke it. For business purposes, we will be able to process the personal data referred to in the first section of this Statement (Personal Data) on the basis of your consent, with the exception of your signature, for as long as Webglobe is entitled to record such data for the purposes of providing the services, fulfilling its legal obligations and protecting its legitimate interests, but no longer than until the consent is revoked or until the expiry of 4 years from the date of termination of a contract for services provided by Webglobe, unless you revoke your consent earlier. If you revoke your consent, this does not affect the processing of your personal data by Webglobe for other purposes and based on other legal grounds, in accordance with this Statement.

· Processing of data of data subjects who have consented to marketing outreach via electronic contact (you are not our customer)

If you are not our customer but have given us your consent to marketing outreach via electronic contact, we process the contacts you have made available to us for the purposes of marketing outreach with Webglobe's services and products with your consent for the period specified in the consent. If you have given us such consent via our website, we also

process the data from the Webglobe cookie that is placed on the website on which such consent was given together with these contacts, but only if you have cookies enabled in your web browser.

- **Processing of cookies from websites operated by Webglobe**

In case you have “cookies” enabled in your web browser, we process behavioural records about you from cookies placed on the websites operated by Webglobe for the purpose of ensuring better operation of these websites and for the purposes of Webglobe's Internet advertising.

SHARING YOUR PERSONAL DATA

1. You as our customer

We will only disclose information regarding your personal data to you after we have sufficiently verified your identity, usually by means of a customer password. This password also gives you access to your user account, from which you can further manage your personal data. If you forget your password, there are documented alternative procedures for us to authenticate you.

2. Employees of Webglobe

Not all of our employees have access to your personal data that we process – our binding internal regulations clearly define a limited group of persons authorised to handle your data (including collection, processing and/or further transfer to third parties, etc.). Our company's internal regulations govern the process of selecting processors, the duration of processing and the individual categories of personal data, the confidentiality obligation, security rules for handling personal data, etc. We have taken measures against possible unauthorized acquisition of your personal data by a third party at three interrelated levels, namely:

- Legal measures (e.g., review and control of contracts between us as the controller of your personal data and processors, our company's personal data processing policy, drafting or reviewing existing directives and internal company regulations, confidentiality clauses for employees, etc.)
- Organisational measures (information protection policy, regular staff training on personal data protection, setting up a process to deal with security incidents with a 72-hour limit, setting up processes to deal with your queries, etc.)
- Technical measures (consent collection system, management of access rights to the system, data logging - i.e. “who, when, where, how, what and why processed”, information security, data anonymisation, etc.)

3. Third parties

We may disclose your personal data or your account information to third parties only subject to the conditions set forth by the laws of the Czech Republic and in accordance with the Business Terms and Conditions, this Statement and any other documents that we agree directly with you.

We will never transfer your personal data to third parties (except as set out below) if:

- you do not give us your unequivocal consent
- it is not necessary for the provision of services or products you have ordered or use
- not required by the legal regulation
- Webglobe is not legally entitled to do so.

We may transfer your personal data only to the following entities:

- **Processors**, i.e. an entity that processes personal data on the basis of a special law or a mandate from the controller (e.g. an external processor of accounting agenda, a partner for sending postal and parcel deliveries, etc.)
- entities to which such authorisation arises by law (e.g. government authorities) and which request us to transfer your personal data in a lawful manner, or entities to which we may transfer personal data as to independent controllers and which are independently responsible for such processing.

If we process your personal data outside of the Czech Republic through our partner, we will comply with all legal regulations and fulfil any and all obligations imposed on us by law.

The recipients of your personal data are companies based both in the Czech Republic and in a Member State of the European Union or in countries providing an adequate level of protection of personal data within the meaning of the relevant decisions of the European Commission.

WHO IS RECIPIENT AND RECIPIENT-PROCESSOR

Recipient means any person to whom your personal data is disclosed, either:

- on the basis of or in accordance with the law
- on the basis of a contract for the processing of personal data (recipient - processor).

We also use the services of third parties in the performance of our contractual obligations and duties. If these third parties process personal data that we have transferred to them, they are in the position of recipients – processors and they always process the personal data transferred by us only within the framework of the instructions we give them and may not use it for any other purpose. Typically, this includes business representation, bookkeeping, activity of various consultants, etc. We always carefully select the entities concerned, assess the extent to which they are able to protect the personal data transferred, and enter into a personal data processing agreement with each of them, in which we clearly

define the processor's obligations to protect and secure your personal data. We have divided the processors of your personal data into the following exhaustively defined categories:

- Administrative and technical support
- Provision of electronic communications services
- Provision of postal and parcel services
- Provision of IT services
- Provision of accounting, tax and legal services, including advisory and audit activities
- Provision of services in the field of marketing and business activities
- Enforcement of receivables

In accordance with the applicable legal regulations, we are entitled or directly, without your consent, obliged to transfer your personal data:

- to the administrative bodies and authorities established by the applicable legislation
- other persons to the extent stipulated by law
- in accordance with our legitimate interests, also to other entities belonging to the Webglobe, a.s. group for the internal administrative needs of the Webglobe, s.r.o. means Webglobe, .s.r.o., with its registered office at Vinohradská 190/2405, Prague 3, Postcode 13061 Czech Republic, Id. No.: 26159708, and all entities directly or indirectly controlled by that company.

HOW WE PROCESS YOUR PERSONAL DATA

Webglobe processes personal data both manually and automatically and keeps a record of all activities, both manual and automated, in which your personal data is being processed.

We collect your personal data in case of:

- purchase of a product or service
- registration for a specific product or service
- order for information materials, brochures, etc.
- enquiries about products or services or other requests for information
- use of our products and services
- visits to websites operated by Webglobe

In addition to the above, we may also collect your data in the form of so-called indirect collection, for example from the commercial register or other list of entrepreneurs, from registers of debtors, etc., in each case in accordance with the applicable legal regulations and only to the extent necessary.

COMMERCIAL COMMUNICATIONS

You can always tell from the commercial communications we send you that Webglobe is the sender. If you are our customer, we send commercial communications to the contacts listed in your user account on the basis of Webglobe's legitimate interest, and only until you raise objection to this. If you are not our customer, we can only send you commercial communications on the basis of your prior consent to the processing of personal data for marketing outreach. If we decide to send third-party commercial communications in the future, we will ask you to consent to the processing of your personal data for commercial purposes in advance. It is always possible to opt-out of receiving these communications via a link in the commercial communications sent. If you are our customer, you can also opt-out of receiving commercial communications directly in your user account.

YOUR RIGHTS IN CONNECTION TO DATA PROTECTION

PASSIVE RIGHT

You have the right to be informed about the processing of your personal data. This means the right to certain information about the processing of your personal data so that the principle of transparency of processing is fulfilled in the first place. This includes in particular information on the purpose of the processing, the identity of the controller, the controller's legitimate interests and the recipients of the personal data. In this case, this is your passive right, since we, as the controller of your personal data, must take action with respect to you - even without your initiative, we must provide the requested information or make it accessible to you as required by law. We do so in particular through this Statement.

ACTIVE RIGHTS

The rights that are primarily based on your activity (request) include, but are not limited to:

1. Right of access to personal data

Upon your request, we will provide you with:

- confirmation of whether we process your personal data
- in particular, information on the purposes of the processing, the categories of personal data concerned, the recipients to whom the personal data have been or will be disclosed, the intended duration of the processing, the existence of the right to require the controller to rectify or erase personal data relating to the data subject or to restrict or object to the processing, the right to lodge a complaint with a supervisory authority, any available information on the source of the personal data, unless obtained from the data subject, etc.
- a copy of the personal data, unless this adversely affects the rights and freedoms of other persons

We may charge you a reasonable fee for providing the information, not exceeding the costs necessary to provide the information, but only if we have already provided you with the same information at least twice and your request appears to be manifestly unjustified or disproportionate. We have to substantiate the apparent lack of justification.

You may exercise this right in writing at the Webglobe's address, provided that you prove that the request is justified.

2. Right to rectification of inaccurate data

It may be that the personal data we collect and further process about you is inaccurate. As our customer, you are obliged to notify Webglobe of any change in your personal data and to provide proof that such change has occurred. Similarly, we require your cooperation if we discover any inaccuracy in your personal data during processing. We agree to correct your personal data as soon as possible or technically feasible.

You may exercise this right in writing at the Webglobe's address, provided that you prove that the request is justified.

3. Right to erasure ('right to be forgotten')

If you do not want us to continue processing your personal data, you can ask us to erase it permanently - we are obliged to comply with your request unless we prove that there are legitimate reasons for processing such personal data (e.g. if you are still our customer, if the 10-year statutory period for archiving invoices has not yet expired, we cannot delete your personal data from the accounting database). When your personal data is no longer needed for the purpose for which it was collected and further processed, we will ensure its erasure or anonymisation through mechanisms that have been set up.

If you believe that your personal data has not yet been erased, please contact us in writing at the address of the Webglobe's registered office.

4. Right to restriction of processing

Until your suggestion or objection to the processing of your personal data you addressed to us is resolved, you have the right to restriction of the processing.

5. Right to notification of rectification, erasure or restriction of processing

If the rectification, erasure or restriction of the processing of your personal data occurs, we will notify the individual recipients of this fact, except where this proves impossible or requires disproportionate effort. If you ask us to do so, we will inform you about these recipients.

You may exercise this right in writing at the Webglobe's address.

6. Right to portability of personal data

If, in connection with the provision of services under a contractual relationship or upon granting of consent, you provide us with personal data which is further processed by automated means in our company, you have the right to obtain this data from us in a structured, commonly used and machine-readable format so that you can transmit it to another controller. If technically feasible, we may also transfer this data directly to the controller you have designated, provided that a person who will act on behalf of the controller is duly and unambiguously identified and whose identity we can verify with certainty.

However, we reserve the right not to comply with your request if the exercise of this right could adversely affect the rights and freedoms of third parties.

You may exercise this right in writing at the Webglobe's address, provided that you prove that the request is justified.

7. Right to object to personal data processing

If we process your personal data for reasons of Webglobe's legitimate interest, you have the right to object to the processing of your personal data. Unless we demonstrate that there is a compelling legitimate reason for the processing which overrides your interests or rights and freedoms, we are obliged to terminate the processing of your personal data without undue delay based on the objection raised.

You can send your objection in writing to us at Webglobe's registered office.

8. Right to revoke consent to the processing of personal data

If we decide to process your personal data for commercial purposes and you have given us your consent to do so, you may revoke your consent at any time thereafter by an explicit, comprehensible and specific manifestation of your will - in our case, either directly in your user account or, in the case of a commercial communication sent to you, also by clicking on the link in the body of such communication.

If you have given us consent to marketing outreach via electronic contact, you may revoke your consent at any time either by telephone or by sending an e-mail to helpdesk@webglobe.cz.

If you no longer wish for cookie data to be processed, it is sufficient to set your web browser to disable cookies in the future. Further information regarding cookies and Google Analytics is available by clicking on the information bar accessible from the Webglobe's homepage.

9. Right not to be subject of any decision based solely on automated decision-making, including profiling

You have the right not to be subject of any decision based solely on automated processing, including profiling, which would have legal effects for you or would similarly significantly affect you. Webglobe represents that it does not, as a matter of principle, carry out automated decision-making, without any human input, with legal effects for you as data subjects.

10. Right to address the Office for Personal Data Protection

You may at any time exercise your right to address your question, complaint or suggestion to the Office for Personal Data Protection (www.uoou.cz).

DATA PROTECTION OFFICER

As from 1 January 2021, the following contact for the Data Protection Officer within the meaning of the Regulation is available:

Webglobe, s.r.o., Data Protection Officer, Vinohradská 190/2405, Prague 3, Postcode 13061 or e-mail: helpdesk@webglobe.cz

This Statement comes into force on the date of its publication on the website operated by Webglobe and becomes effective on 1 September 2021.