

Sir Joseph
CUSTOMER PRIVACY POLICY

Art. 13 of the New European Regulation 2016/679 relative to protection of physical persons with regard to handling of personal information (GDPR) and art. 13 of Legislative Decree 196/2003 as amended.

Dear Sir or Madam,

By way of this privacy policy (“**Policy**”), we hereby notify you that the personal information provided by you to SIR JOSEPH S.R.O. (SIR JOSEPH or “**Company**”), or the information acquired by the Company for the establishment, management, execution and/or termination of the contract, may be the subject of handling. Unless otherwise indicated, the terms set forth in article 4 of the Regulation are also used in this Policy with the same meanings attributed in the Regulation.

The handling of personal information shall be carried out manually or through computerized instruments, in any case suitable for guaranteeing the security and confidentiality of the same, and for preventing unauthorized access to the personal information, for the following purposes:

1. instrumental purposes for the establishment, management, execution and/or termination of the contract;
2. purposes connected to the management of said relationship, or for operating/management requirements (e.g. accounting and fiscal requirements, credit management, etc.);
3. purposes connected with fulfilment of obligations based on national and community regulations or set forth by legitimate legal authorities;

The handling of personal information for exercising the purposes set forth above shall be carried out in conformity with the provisions set forth in the Regulations and Legislative Decree 196/2003 as amended, and your advance consent is not necessary.

The collected information will be stored in full respect of the obligations set forth in applicable law, for a period of time not to exceed the time necessary for fulfilling the previously stated purposes, according to the specifications set forth in the contract.

The object of the handling shall be all the personal information that you have transferred or will transfer in relation to the execution of the contract, or which the Company may become aware of in the same context. Therefore, the Company will or may become aware of personal information, possibly sensitive or legal in nature, about your company, your employees or third parties (e.g. your Suppliers of customers). Assume that we have informed said third parties about the handling of the information that the Company may carry out for the execution of the assignment received from you, and if required according to the Regulations, that we have received necessary consent.

We therefore confirm that this personal information will be handled confidentially and in full respect of the law. Personal information and information relative to your company may be communicated to the following categories of subjects for the same purposes as those stated previously:

- people, companies, associations or professional firms that provide assistance, consulting, or services to the Company, particularly but not exclusively in reference to technological, accounting, administrative, legal, fiscal and financial issues;
- banks and insurance companies;
- subjects, which according to the law and secondary regulations, or provisions set forth by authorities or legitimated by the law, are allowed to access the personal information.

The personal information that pertains to you, if necessary for the purposes described above, will also be revealed to the employees of the Company who handle the personal information as employees assigned for that task, also in reference to offices located in foreign countries.

The subjects belonging to the categories indicated above will use the personal information as persons assigned to this task and in total autonomy, as they are separate from the original handling carried out at our Company.

Handling, External Managers of Handling of personal information through nomination, with indication of the methods of handling and security measures that must be adopted for the management and conservation of personal information held by the Company.

The list of names of people to whom your information was or may have been communicated is available to you through e-mail request sent to INFO@SIRJOSEPH.CZ.

Your transfer of personal information necessary for fulfilling a legal obligation is mandatory and possible refusal to do so or communication of erroneous information may have the following consequences: a) the impossibility of the holder of the information to guarantee correct handling of the same for the purposes of the contract, for both written and spoken information, in relation to or on the occasion for which the information was provided; b) the possible incongruence of the results of handling of the information with fiscal or administrative requirements, or the purpose for which the information was collected. Transfer of additional personal information not directly required by law or other regulations may nevertheless be necessary for the establishment, implementation or execution of the contract; in this case, possible refusal to provide said information could result in the impossibility to correctly execute the contractual relationship.

We hereby inform you that you may exercise, through a written request sent to the Information Handling Manager at INFO@SIRJOSEPH.CZ, the rights pursuant to Articles 15, 16, 17, 18, 20, 21 of the Regulations, which give the person in question the right to (i) obtain confirmation from the holder of the information of the existence or not of his/her personal information, and in this case to access the information pursuant to Article 15 section 1, among which the right to know the origin of the information, as well as the logic and objectives of the handling of the same, with indication of the categories of subjects to whom the information may be communicated, with identification details of the holder of the information and managers, the subjects or categories who may become aware of the information or may be communicated the information in their roles as designated representatives of the State, both managers and employees; (ii) obtain cancellation ("Right of Cancellation"), transformation into anonymous form, or blocking of the information handled in violation of the law, (iii) updating, rectification, or if you request it, integration of the information, (iv) obtain limitation of handling, according to the hypothesis set forth in Article 18 section 1, (v) opposing handling of the information, in whole or in part, for legitimate reasons. If the personal information is handled for the purpose of direct marketing, the person in question has the right to oppose the handling of their personal information for this purpose at any time, including information used for profiling connected to direct marketing.

The person in question has the right (vi) to receive their pertinent personal information in a structured format, commonly used and legible on an automatic device as provided to the holder of the information, and the right to transmit this information to another holder of personal information without impediment by the previous holder who provided the information, in accordance with the conditions indicated in Article 20, Comma 1; the person in question has the right to direct transmission from one holder of information to another if technically feasible. The Holder of the information commits to communicate to each of the recipients who transferred personal information all rectifications or cancellations or limitations in handling implemented in accordance with Article 16, Article 17, section 1, and Article 18, unless impossible or requiring disproportionate effort. The person in question also has the right to revoke consent at any time without prejudice to the legality of handling the information based on the consent provided prior to the revocation, without prejudice to the consequences described above of possible refusal to providing personal information, as well as the right to issue a complaint to the Control Authorities.

The Company commits to respond to requests by the person of interest within one month, except for in cases of particular complexity, which may require up to three months. In any case, the Company shall provide evidence to the person in question of the reasons for said complexity within one month from the request. The result of the request will be provided in writing or electronic format. If the person in question requests rectification, cancellation or limitation of handling of the information, the Company commits to communicate the details in the request by the person in question to each of the recipients of said information, unless this is impossible or requires disproportionate effort.

The Company hereby states that the person in question may be required to contribute if the requests are manifestly unfounded, excessive or repetitive; regarding the same, the Company records all requests in a dedicated register.

The Holder of the information is SIR JOSEPH S.R.O. with offices in KOSKOVA 1766, TURNOV 51101, CZECH REPUBLIC, EU.

The Company has identified a *Privacy Focal Point*, a person nominated by the Holder of the Information to apply identified protection measures, and also identifies a pro tempore Person of Reference in the Services Area, nominated at the Company offices.

TURNOV 25.5.2018

SIR JOSEPH S.R.O.