

INFORMATION ABOUT PROCESSING OF PERSONAL DATA

in connection with the use of the TF mobile ID mobile application (“Information”)

TECH FASS s.r.o., reg. No.: 25073397, with its registered office Věštínská 1611/19, 153 00 Praha 5, Radotín, Czech Republic, file No. C 47258 administered by the Municipal Court in Prague (“TECH FASS” or “Controller”) as the Controller of personal data hereby, in accordance with **Regulation (EU) 2016/679**, on the protection of natural persons with regard to the processing of personal data (“Regulation”) and other generally binding legal regulations on the protection of personal data, informs its customers about the processing of their personal data by TECH FASS taking place in connection with the use of the **TF Mobile ID** mobile application (“Application”).

For the purposes of this Information, a customer of TECH FASS is every entity using the Application.

Terms not expressly defined in this Information or other documents the Information may refer to have the meanings as specified in the Regulation.

1. Controller’s contact details

If necessary to deal with issues related to the protection of personal data, customers may contact the Controller in writing, either by letter sent to the address of its registered office provided above or electronically by sending an email at gdpr@techfass.cz or, by appointment, in person in the Controller’s premises.

2. Purposes of personal data processing

In connection with the use of the Application by customers, TECH FASS processes their personal data to:

- a) enable customers to use the functionalities of the Application under the License Agreement;
- b) fulfil its statutory obligations associated with the operation of the Applications and provision of services based on it.

3. Legal basis for personal data processing

TECH FASS has the following legal titles to process personal data:

- a) processing is necessary for the fulfilment of the License Agreement the customer is a party to or for the implementation of measures adopted before the conclusion of the License Agreement at the request of the customer;
- b) processing is necessary for the fulfilment of legal obligations that apply to TECH FASS and follow from generally binding legal regulations.

Customer’s consent is not necessary for the above processing.

4. Categories of personal data concerned and their source

TECH FASS processes the following categories of personal data for the respective purposes of processing:

- a) customer’s email address;
- b) IMEI of the customer’s device on which the customer will use the functionalities of the Application.

The source of the personal data is the customer using the Application.

5. Recipients of personal data

In the context of processing, personal data may be disclosed to other entities, titled recipients. There are (i) entities directly involved in some processing sub-activities, i.e., processors, or (ii) entities to whom data can be disclosed *ad hoc* as a result of their provision of specialised services to TECH FASS (for example, IT specialists, legal counsels, etc.) the primary content of which, however, is not the processing of such data.

All recipients are selected responsibly based on guarantees they provide to safeguard the data through adopted technical and organisational measures.

In principle, processors carry out data processing activities based on a data processing agreement in place.

In the above meaning, TECH FASS may provide personal data to the following categories of recipients:

- a) HW administrators (in the context of maintenance, support and development of HW resourced used to operate the Application);
- b) administrators and creators of computer programs, mobile applications and information systems (in the context of their maintenance, support and development of the Application);
- c) providers of electronic communications services (in the context of normal communication of the Application via GSM/GPRS networks, the internet and similar methods);
- d) providers of archiving and shredding services (to ensure compliance with prescribed time limits for archiving);
- e) public authorities (e.g., law enforcement authorities, courts and bailiffs performing a legal obligation);
- f) expert consultants (e.g., in the context of testing the security of the infrastructure used, legal counsels).

All persons TECH FASS may engage in personal data processing will comply with the requirements stipulated by the Regulation. In processing personal data, all employees of TECH FASS are obliged to comply with the instructions regarding the personal data processing and to maintain in confidentiality personal data they process in performing their work activities.

The Controller does not intend to transfer the personal data processed to a recipient in a third country or an international organisation.

Personal data are stored on cloud services servers of the provider and are located in the territory of the Netherlands. Servers are managed, maintained and backed up with the necessary expertise and with adequate levels of security.

6. Storage period of personal data

Personal data are only stored with the Controller only for the time necessary for the purposes for which they are processed, i.e.:

- a) in the case of use of functionalities of the Application by the customer for the period of support of the Application;
- b) in the case of fulfilment of statutory for the period stipulated by the law.

Personal data are deleted after the expiry of that period.

7. Rights of customers and failure to provide personal data

The Regulation grants extensive rights to customers in connection with the processing of their personal data. The most important ones include:

- a) Right of access to personal data

The customer has the right to access to personal data, which includes both the right to obtain from the Controller a confirmation of whether personal data relating to the customer are being processed or not, and if so, the right to access personal data and other information laid down by the regulations on the protection of personal data.

In the case of repeated requests for a copy of the data, the Controller will charge a reasonable fee. If the customer requests provision in electronic form, information will be provided in a commonly used electronic form.

b) Right of rectification of inaccurate personal data

The customer has the right to demand that the Controller rectify the customer's personal data without undue delay. The customer has the right, taking into account the purposes of processing, to the completion of incomplete personal data, including by provision of an additional statement.

c) Right to erasure

The customer has the right, for reasons set out in Art. 17 of the Regulation, to erasure of personal data relating to them, and the Controller will erase the data without undue delay, unless the processing is necessary for any of the reasons set out in the Regulation.

d) Right to restriction of processing

The customer has the right to demand that the Controller restrict the processing of the customer's personal data in any of the cases set out in Art. 18 of the Regulation.

e) Obligation to inform with respect to rectification or erasure of personal data or restriction of processing

The customer has the right to demand that the Controller inform each recipient to whom the personal data have been disclosed of any rectifications or erasures of personal data or restriction of processing made in accordance with the Regulation, unless where this proves impossible or involves disproportionate effort.

f) Right to data portability

In cases set out in Art. 20 of the Regulation, the customer has the right to obtain personal data relating to the customer previously provided to the Controller in a structured, commonly used and machine-readable format, and the right to transmit those data to another controller without hindrance from the Controller. If technically feasible, the customer may request transmission of the customer's data by the Controller directly to the other controller. The exercise of this right must not adversely affect the rights and freedoms of other persons.

g) Automated individual decision-making, including profiling

The customer has the right not to be subject to a decision based solely on automated processing, including profiling.

If the customer believes that the Regulation has been violated by the processing of the customer's personal data, the customer has the right to lodge a complaint with the supervisory authority. The supervisory authority of the Czech Republic is the Office for Personal Data Protection (www.uoou.cz).

Failure to provide the above personal data is an obstacle to the use of the Application, and any request for erasure of personal data can mean the end of its use.

Provision of personal data is mandatory in cases where the provision of such data follows directly from the law.

8. Means of personal data processing

TECH FASS processes personal data largely automated, to a lesser extent in a different manner; however, automated decision-making without the influence of human assessment with legal effects for the customer, including profiling, does not take place.

TECH FASS s.r.o.