

Dear suppliers

SOPHIA, jazykové služby s.r.o., Reg. No.: 26025876 (hereinafter "SOPHIA" or "WE"), considers personal data protection to be an integral part of its responsibilities with respect to parties it cooperates with. Therefore, it pays due attention to personal data protection and complies with the applicable legislation in doing so.

In the paragraphs below you will find the following information:

- A. What personal data we process.**
- B. Why we process personal data and what authorizes us to do so.**
- C. Who processes your personal data and whom they are disclosed to.**
- D. What the sources of the personal data we process are.**
- E. What your rights are concerning personal data processing.**

This information on personal data processing deals with the processing of the personal data of our **suppliers - natural persons doing business** and **representatives of our suppliers - legal persons**.

This website always contains the latest version of information on personal data processing in our company.

A. What personal data do we process?

We process the following personal data:

- **Identification data**, referring in particular to the name, surname, date of birth, permanent residence address, Registration Number, place of business, etc.,
- **Contact details**, referring to personal data which allow us to contact you, in particular correspondence address, telephone number, email address, etc.,
- **Data on the financial situation**, referring in particular to SOPHIA's paid as well as unpaid receivables and liabilities with respect to you, its payment history, history of inquiries and purchase orders, complaints, etc.

B. Why do we process personal data and what authorizes us to do so?

As part of our activities we process personal data for various purposes and to a varying extent on the basis of contracts, legal obligations and our legitimate interests.

Processing without your consent - based on a contract and our legitimate interests

We process your personal data on the basis of a **contract, if you are a supplier - natural person doing business**, or on the basis of **our legitimate interests, if you are a representative of a supplier - legal person**, insofar as the legitimate interests in these cases mean ensuring the proper conduct of our business and the fulfilment of our obligations with respect to our customers. On the aforementioned legal grounds we process **your identification data and contact details and data from public sources** for the following purposes:

- *preparation, conclusion and implementation of contracts with suppliers and business partners* (in other words, to be able to prepare and conclude a contract with you as the basis of our cooperation and to be able to better ensure the proper performance of that contract as well as the settlement of your related complaints and queries).

For these purposes we retain personal data for the period of time necessary to exercise the rights and obligations arising from the mutual contractual relationship with you and for the duration of the statute of limitations (no longer than 15 years from the end of the contractual relationship) for any claims arising from or related to the contractual relationship, extended by an additional year to ensure the protection of our legal claims. In case judicial, administrative or other proceedings are initiated we process your personal data to the necessary extent for the duration of such proceedings.

Processing without your consent - based on fulfilment of a statutory obligation

While carrying out our activities we must perform certain obligations stipulated by law. If we process your personal data for that reason, we are not required to obtain your consent.

If you are a supplier - natural person doing business or a representative of a supplier - legal person, we process **your identification data and contact details and data on your financial situation** to fulfil our statutory obligations and ensure compliance in particular with the following acts:

- Act No. 499/2004 Coll., on Archiving and Records Management (this Act governs obligations relating to the keeping of selected documents);
- Act No. 563/1991 Coll., on Accounting (this Act governs requirements for creating and processing accounting documents and related activities);
- Act No. 235/2004 Coll., on Value Added Tax (this Act governs requirements for creating and processing accounting documents and related activities).

Based on justified requests and similar communication, we may disclose your personal data to public authorities (e.g. police, courts and tax revenue offices).

We keep the personal data processed in order to fulfil legal obligations for the period of time required by legislation. Since this type of processing is specified by law, you cannot raise any objections to this processing or revoke your consent because we are required to process such data.

Processing without your consent - based on our legitimate interests

If you are a supplier - natural person doing business or a representative of a supplier - legal person, we may process **your identification data and contact details and data on your financial situation and data from public sources** on the basis of our legitimate interests without your consent for the following purposes:

- *protection of our legal claims* (in other words, for activities relating to the prevention and detection of fraudulent and other unlawful conduct, risk management, recovery of receivables, settlement of complaints as well as for evidentiary purposes in the form of archiving records on legal conduct and other material facts), where our legitimate interest is to prevent the occurrence of losses on our part;
- *keeping internal statistics and records, performing internal controls and providing for other operating purposes of our company* (in other words, to ensure the effective operation of all of our internal processes (e.g. correspondence management) a continuous improvement of our services (e.g. by creating statistics and overviews for planning purposes), where our legitimate interest is to ensure the provision of our services at the highest quality possible and to improve the efficiency of our company's operations.

For these purposes we retain personal data for the period of time necessary to exercise the rights and obligations arising from the mutual contractual relationship with you and for the duration of the statute of limitations (no longer than 15 years from the end of the contractual relationship) for any claims arising from or related to the contractual relationship, extended by an additional year to ensure the protection of our legal claims. In case judicial, administrative or other proceedings are initiated we process your personal data to the necessary extent for the duration of such proceedings.

C. Who processes your personal data and whom are they disclosed to?

We process all the aforementioned personal data as a **data controller**. It means that we determine the purposes defined above for which your personal data are collected, determine the resources for processing and are responsible for its proper performance.

To process personal data we also use the services of other processors who process personal data at our request. Such **processors** are in particular:

1. lawyers and companies in charge of the recovery of receivables in case they process personal data in order to protect our legal claims;
2. auditors and experts who process personal data for the purposes of protecting our legal claims or fulfilling our legal obligations.

We are also obliged to disclose the personal data processed to public authorities, courts, law enforcement authorities and supervision authorities in case they request them. We may also disclose personal data to such entities and judicial executors on the basis of our legitimate interests.

D. What are the sources of the personal data we process?

In most cases we process personal data provided to us directly by you during negotiations on the conclusion of a contract or as part of any other contact with you.

We obtain most personal data directly from you, in particular when you enter them in the respective forms and in contractual documentation or provide them during phone talks or other forms of communication.

We also obtain and process personal data from public sources, including public registers as well as data published by you on the internet, always subject to compliance with statutory requirements.

E. What are your rights concerning personal data processing?

In the same way as we have our rights and obligations concerning the processing of your personal data, so you too have many rights relating to your personal data. These rights include:

Right of access

Simply put, you have the right to know which of your personal data we process, for what purposes, for how long, where we obtain your personal data, to whom we disclose them, who processes them aside from us and what your other rights are in relation to the processing of your personal data. You have learnt all that in this information on personal data processing. If you are unsure, however, which of your personal data we process, you may ask us for confirmation of whether we do or do not process any of your personal data, and if so, you have the right of access to such personal data. As part of this right of access you may ask us for a copy of the processed personal data.

Right to rectification

If you find out that your personal data processed by us are inaccurate or incomplete, you have the right to have them rectified or amended by us without undue delay.

Right to erasure

In certain cases you have the right to have your personal data erased by us. We shall erase your personal data without undue delay if any of the following reasons applies:

- we do not need your personal data any more for the purposes for which they were processed,

- you revoke your consent to personal data processing in case of data for the processing of which your consent is necessary and at the same time there is no other reason for us to process such personal data any more (for example to defend our legal claims),
- you exercise your right to object to the processing of personal data we process on the basis of our legitimate interests and we determine that we do not have any such legitimate interests for their processing any more, or
- the processing of personal data performed by us turns out not to be in compliance with generally binding legislation any more.

Even if one of the reasons above applies, it does not mean we would erase all your personal data immediately. This right shall not apply if the processing of your personal data is still required:

- for us to meet our legal obligations,
- for the purposes of archiving, scientific or historical research or statistical purposes, or
- for the establishment, performance or defence of our legal claims.

Right to restriction of processing

In certain cases you may, in addition to the right to erasure, exercise the right to restriction of processing of personal data. This right allows you to require, in certain cases, to have your personal data marked and such data shall not be subject to any other processing operations - in that case, however, not forever (as in case of the right to erasure), but for a limited period of time. We shall limit the processing of personal data if:

- you deny the accuracy of the personal data, before we agree on which data are correct,
- we process your personal data without sufficient legal grounds but you prefer their restriction rather than their erasure,
- we do not need your personal data for the processing purposes above any more but you require them to establish, exercise or defend your legal claims, or
- you raise an objection to processing. We are obliged to restrict the processing of your personal data for the duration of the investigation of whether your objection is reasonable.

Right to portability

You have the right to obtain from us all your personal data which you have provided to us and which we process on the basis of your consent and on the basis of contract performance. We will provide you your personal data in printed form. To be able to easily transfer the data at your request, it may only apply to data processed automatically in our electronic databases. Therefore, we cannot always and under any circumstances transfer in this form all the data you have entered in our forms (e.g. your handwritten signature).

Right to object to processing

You have the right to object to personal data processing which takes place on the basis of our legitimate interest. As far as marketing activities are concerned, we will cease processing your personal data immediately; in other cases we shall do so if we have no serious and justified reasons to continue with the processing.

Right to complain

The exercise of the rights in the manner above shall be without prejudice to your right to complain with the Office for Personal Data Protection. You may only exercise this right in case you think that we process your personal data illegitimately or in conflict with generally binding legislation.

How can you exercise your rights?

In all matters involving the processing of your personal data, be it a question, exercise of a right, a complaint or anything else, you can contact us

by email at: sophia@sophia-cb.cz,

in writing at the address:

SOPHIA, jazykové služby s.r.o., Personal Data Protection, Hroznová 253/28, České Budějovice, 370 01.

You may submit complaints against our processing of personal data to the Office for Personal Data Protection, based in Pplk. Sochora 27, 170 00 Prague 7.



Jan Bauer
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SOPHIA, jazykové služby s.r.o.