

# Privacy Policy of MTR2 Technology s.r.o.

*pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the information of data subjects (hereinafter referred to as "GDPR") and pursuant to Act No. 110/2019 Coll., on the processing of personal data*

Thank you for visiting our website.

The company MTR2 Technology s.r.o., with registered office: Hlavní 450, 251 01 Herink, ID No.: 17983657, registered in the Commercial Register maintained by the Municipal Court in Prague, file No. C 379680/MSPH, represented by the company's executives: Carl Johannes Fruth or Petr Tůma (hereinafter referred to as "**MTR2 Technology**" or "**Controller**") processes personal data of Personal Data Subjects in the performance of its business activities, which means that it determines the purpose and means of processing personal data, carries out the processing of personal data and bears responsibility for this processing.

In connection with the services we provide, the existence of a contractual relationship between us or when users browse our website, it is necessary for us to collect certain personal data. Therefore, for your convenience, we have compiled a set of policies regarding the protection and treatment of such personal information ("Policy"). The protection and security of your personal information when using our website is very important to us. We would therefore like to inform you at this point which personal data we collect from you when you visit our website or MTR2 Technology applications, and for what purposes it is used.

This Policy applies to the MTR2 Technology website, which is accessible under the domain <https://mtr2.global/> and various subdomains ("**our website**").

## **Basic terms used:**

**PII** = Personal data, i.e. all information leading to the identification of a specific natural person.

**OU Subject** = Subject whose personal data is processed by the Controller.

**Controller** = MTR2 Technology, which records, processes, archives and protects your personal data.

**Group** = Represents a grouping of several companies around the main parent company MTR2 GmbH, to which they are mainly linked through shareholdings, and which also includes MTR2 Technology. FIT AG is also part of this group.

## **I. CONTACT DETAILS OF THE ADMINISTRATOR**

As data controllers, we are available for questions or requests for information regarding the processing and protection of personal data of all persons whose data we process. You can contact us at the contact details below:

MTR2 Technology s.r.o.  
headquarters: Hlavní 450, 251 01 Herink, Czech Republic  
**Phone: 724 833 773**  
**E-mail: [mtr2@mtr2.global](mailto:mtr2@mtr2.global)**

## **II. WHAT ARE THESE PRINCIPLES ABOUT?**

This Policy contains the legal requirements for transparency in the processing of personal data. Personal data is any information relating to an identified or identifiable natural person. This includes, for example, information such as your name, age, address, telephone number, date of

birth, email address, IP address or user behaviour when visiting a website, etc. The processing of personal data (e.g. collection, retrieval, use, storage or transfer) always requires a legal basis and a defined purpose for the processing.

### III. CATEGORIES OF OU ENTITIES

1. Cooperating third parties Administrator, contractors
2. Employees, workers and persons holding positions in the bodies of the Administrator, applicants for employment,
3. Service providers for the Administrator,
4. Other persons who are in a contractual relationship with the Administrator
5. Customers Administrator

### IV. MAIN OBJECTIVES OF DATA PROTECTION

The processing of personal data is guided by the following main data protection objectives:

- Ensuring the protection of the rights of natural persons in connection with the processing of their personal data.
- Maintaining ongoing compliance with the requirements of the GDPR.
- Maintaining compliance with other legal and technical requirements set out in related legislation and standards.
- Ensure the ability to prevent and manage adverse events related to GDPR.
- Continuous improvement of the suitability, adequacy and effectiveness of the OU protection management system.

### V. CATEGORIES OF DATA SUBJECT TO PROCESSING (WE PROCESS THE FOLLOWING DATA)

With regard to data protection, we limit the processing of personal data to data that is reasonable and relevant for the relevant contractual or business purpose. These are personal data for identification and communication with you and special categories of personal data that are necessary for our business activities in accordance with the relevant statutory provisions.

#### Categories of personal data of customers, business partners or suppliers:

1. Identification data used to uniquely and unmistakably identify the OU Subject (i.e. name, first name, surname, date of birth, title, ID number, VAT number, etc.)
2. Contact details (email, phone, residence, headquarters, etc.)
3. Financial or bank details (billing details - bank account number, bank)
5. Data necessary for the performance of the contract or processed on the basis of a legal obligation (order data...etc.)
6. Other data provided on the basis of explicit consent to the processing of personal data (e.g. photographs, IP address, date and time of access to the website, information about your internet browser, operating system, data on web behaviour, etc.)
7. Audiovisual data (e.g. a likeness, audio or visual recording taken by a camera system with recording).

#### **Categories of personal data on job applicants and employees and contractors:**

1. Address and Identification Data used to uniquely and unmistakably identify the Subject of the OU (i.e. name, surname, date of birth, ID card number, birth number, title, if applicable)
2. Data enabling contact with the Subject of the OA (email, telephone, workplace address, residence, etc.)
3. Descriptive data (billing data - bank account number, bank)

5. Other data necessary for the performance of the contract or processed on the basis of a legal obligation
6. Other data provided on the basis of the subject's explicit consent to the processing of personal data (e.g. photographs, etc.)

## **VI. RESOURCES FOR OBTAINING OU**

We're getting OU:

- a. Directly from the OU Subject (business electronic communication, purchases, delivery of products and services, contact form on the website, communication by phone, login to user account, business cards, etc.).
- b. Another source of OI is information necessarily provided by OI Subjects (contractors, business partners, job applicants in the tender process and employees of the Administrator at the conclusion of a contract or in connection with the performance of a contract, the provision of services under a contract or in accordance with the consent obtained from the OI Subject).
- c. If the data are obtained from public sources, the Internet, social networks, public administration information systems, they are used exclusively for the purpose of implementing the contractual relationship. Furthermore, we process personal data legally obtained about OU Subjects from public registers.
- d. The processing of personal data may also occur in the case of the provision of personal data to the OU Subject by a third party to whom the OU Subject has provided consent or direct power of attorney for this purpose.
- e. CCTV footage. More detailed information on the camera systems with recordings taken in the premises leased by the Administrator for the performance of its activities can be obtained by the subjects of the OÚ on request from the Administrator, namely the Internal Directive entitled: Information on the protection and processing of personal data - camera system of 25.3.2024, which is available in the office at the entrance to the headquarters of the Administrator.

## **VII. SCOPE OF PROCESSING OF THE OU**

PII is processed to the extent that the relevant Subject has provided it to the Controller, in the context of and on the basis of a free decision at the time of the establishment of the relationship or registration and further within the framework of a contractual or other legal relationship with the Controller, or which the Controller has otherwise collected and processes in accordance with applicable law or to fulfil the Controller's legal obligations.

## **VIII. THE PURPOSES OF THE PROCESSING OF THE OU**

OU is processed only to the extent necessary for the purpose and for the time necessary to fulfil the purpose. In particular, the Controller processes the following:

- for the purpose of concluding and performing product, service or cooperation contracts
- for the purposes of the Administrator's internal administration (process optimization, reporting, training, customer record keeping, marketing purposes, tracking website traffic, improving website features ...),
- for the purposes of legitimate interests, protection of the rights of the Controller, the recipient or other persons concerned (business risk assessment, security...)
- for archiving purposes kept on the basis of the law
- for the purposes of vacancy selection procedures
- for the purposes of the Administrator's compliance with its legal obligations
- for the purpose of protecting the vital interests of the OU Subject or other entities

- for the purpose of sending commercial communications concerning similar products or services of the Controller
- for the purposes contained in the OU Subject's consent to the processing of personal data

## IX. PROCESSING TIME OÚ

The Controller shall process personal data in accordance with the time limits specified in the relevant contracts, information on the processing of personal data, processing consents, the Controller's file and shredding rules or in the relevant legal regulations (e.g. for tax documents, the time limit is at least 10 years. The controller is guided by the principle that personal data should be kept for the shortest possible period of time.

The retention period of your personal data may vary from case to case. Unless otherwise specified below (e.g. by law), we process personal data for a period of 5 years from the end of the contractual relationship (all rights and obligations) between the Data Subject and us. For personal data provided on the basis of consent, for a maximum period of 3 years from the end of the last contractual relationship (all rights and obligations) or within 30 days from the withdrawal of your consent. In the case of CCTV recordings made, the recordings are kept for a maximum of 7 days in accordance with the Guideline entitled: Information on the protection and processing of personal data - CCTV system dated 25.3.2024, except in cases where the recordings are provided to law enforcement authorities for reasons given by law.

The stored personal data will be erased, destroyed or anonymised as soon as the purpose of the processing has been achieved and there are no legitimate grounds for further retention of the data. We will inform you of the specific archiving and shredding periods or archiving criteria for individual processing operations upon request.

## X. Who will receive my data? - CATEGORIES OF RECIPIENTS OÚ

We will only share your personal data that we process on our website with third parties if this is necessary for the fulfilment of the purposes and if there is a legal basis for doing so in the specific case (e.g. consent or safeguarding legitimate interests).

If we use service providers to operate our website who process personal data on our behalf in the context of delegated processing pursuant to Article 28 GDPR, these may be the recipients of your personal data.

To the extent permitted by law or as contractually agreed with you, **we share personal data with** companies in our Group as well as with external service providers. Recipients of Personal Data have committed to at least the same level of protection of Personal Data as set out in this document.

Categories of OU beneficiaries:

- Companies that are part of the Group, i.e. companies that are related to MTR2 Technology (i.e. the parent company MTR2 GmbH and companies belonging to the Group, e.g. FIT AG.), for the purpose of fulfilling your contract and for the purpose of reporting to the parent company and related companies in the Group. Within the Group companies, we only transfer your personal data between selected companies and use it for internal administration and reporting purposes. Where the transfer of your data may facilitate, for example, the conclusion of a contract and the resolution of matters relating to your products across the selected Group companies that provide them, we

transfer it for this purpose. We may also transfer data to each other for prudent security reasons.

- the Controller's partners and third party service providers. For example, for the purposes of consulting or other services, providing the website, etc.
- Credit institutions and payment service providers for the settlement and processing of payments.
- OA processors under contracts with the Administrator (external accounting office, external IT company)
- Third parties and organisations on the basis of consent granted by the OU Subject
- Public authorities in justified cases (e.g. social insurance providers, tax authorities, police, prosecutors, supervisory authorities).

#### **XI. How is my data processed in detail in the following situations?**

##### **We also inform you about the individual processing operations:**

There is no automated decision-making in individual cases, including profiling.

##### **Preparation of the contract**

We only collect and process data that is necessary and essential for the design of your contract. In order to conclude a contract with you, we need to know your name, surname, date of birth or business name, VAT number, contact details. Other data depends on the type of service or product or the type of business cooperation that is the subject of the contract.

##### **User account**

This is the recording of data filled in forms and fields within our services. You can use MTR2 Technology services as a logged in or non-logged in user. Some of them can only be used in login mode. For these you will need to complete a registration form. Filling in your username, entering and confirming your password and confirming the terms and conditions will give you one user account. Similarly, you may be asked to agree to specific terms and conditions for a particular service and, in the case of disclosure of personal data, to give specific consent to its processing. We only collect and process data that is necessary and essential for the possibility of using a user account on our website. You can log in to your user account based on your chosen username and password. Only the user has access to the user account. In order to be able to use the user account, we need to know your name, surname, date of birth or business name, VAT number, address, telephone number, email, photo of the location of the machine in the shop. Other data depends on the type of service or product or type of business cooperation. The data is processed on the basis of the performance of the contract in order to provide the requested service to the extent and scope defined by each of them. However, it is always in accordance with the facts stated in the contractual terms and conditions and in the information on the principles of processing personal data, if the data is collected in the context of the service. The processing of data will take place for the fulfilment or conclusion of the obligation incurred towards you. The data provided is stored at the company's headquarters in an EXCEL spreadsheet on a secure computer and in the SW system for technical supervision of the machine and the possibility of purchase.

##### **Use of our website and online environment**

When you open and use our website, we collect personal information that your browser automatically transmits to our server. Information about which devices you access our services electronically is processed. The following information is temporarily stored in a so-called log file:

- IP address of the requesting computer
- Date and time of access
- Name and URL of the loaded file
- The website from which access is made (referrer URL)
- The browser and, if applicable, the operating system of your computer
- and the name of your access provider.

The processing is carried out in order to protect our overriding legitimate interest in the display of our website and to ensure the security and stability of our website on the basis of Article 6(1)(f) GDPR. Data collection and storage in log files is mandatory for the operation of the website. There is no right to object to the processing on the grounds of an exemption pursuant to Article 21 (1) GDPR. If the further storage of log files is required by law, the processing is based on Article 6 (1) (c) GDPR. There is no legal or contractual obligation to provide the data, however, calling up our website is not technically possible without providing the data. The above-mentioned data is stored for the duration of the website display and for technical reasons for a maximum of **360 days**.

### **Contact form**

On our website we offer you the possibility to contact us via the form provided. The information collected through the mandatory fields is necessary to process a commercial offer. In addition, you can voluntarily provide other information that you consider necessary to process the contact request. When using the contact form, your personal data will not be passed on to third parties. The processing of your data using our contact form is carried out for the purpose of communicating and processing your enquiry on the basis of your consent pursuant to Article 6(1)(1)(a) of the GDPR. GDPR. If your enquiry relates to an existing contractual relationship with us, processing is carried out for the purpose of performance of the contract on the basis of Article 6(1)(1)(a) of the GDPR. b GDPR. There is no legal or contractual obligation to provide your data, but processing your request is not possible without providing the information in the mandatory fields. If you do not wish to provide this information, please contact us in another way.

If you use the contact form based on your consent, we will retain the data collected about each request for three (3) years, starting from the completion of your request or until you withdraw your consent within 30 days of withdrawal.

If you use a contact form as part of a contractual relationship, we will retain the collected data of each request for **three (3) years** after the end of the contractual relationship.

## **XII. TRANSFER OF DATA OUTSIDE THE EU**

Where we use the services of various external suppliers (e.g. software tools), we may in some cases transfer your personal data outside the EU, specifically to the USA.

If we transfer your personal data outside the EU, we always do so in accordance with the provisions of Chapter V of the GDPR - specifically, in accordance with the European Commission's decisions to ensure an adequate level of protection and/or standard contractual clauses (Model Clauses) containing sufficient safeguards that appear necessary given the nature of the personal data processed.

## **XIII. SECURITY OF PERSONAL DATA**

We have implemented and maintain appropriate technical and organizational measures, internal control and information security processes in accordance with legal regulations and market recognized standards to eliminate potential risks to you as an OU Entity. We also take into account the current state of technological developments when protecting your personal data from accidental loss, destruction, alteration, unauthorized disclosure or access. These measures may include, but are not limited to, personal accountability of selected employees, training of employees who are authorized to access your personal information, regular backups, established data recovery procedures, handling of adverse events, software protection of devices on which personal information is stored, etc.

The processing of the Personal Data is carried out by the Controller, or by a processor with whom the Controller has concluded a contract that guarantees that all responsibilities in processing the Personal Data and the rights of the Subject of the Personal Data will be respected.

#### **XIV. What rights do I have? - RIGHTS OF THE SUBJECT OF THE OU**

Under the terms of the legal provisions of the General Data Protection Regulation (GDPR), you have the following rights as a Subject of the Personal Data in accordance with Article 12 of the GDPR:

- **Right to Information** under Article 15 GDPR about the data stored about you in the form of meaningful information about the details of the processing and a copy of your data;
- **The right to rectification** under Article 16 GDPR of incorrect or incomplete data we store;
- **The right to erasure** pursuant to Article 17 GDPR of data stored by us if the processing is not necessary for the exercise of the right to freedom of expression and information, for compliance with a legal obligation, for reasons of public interest or for the establishment, exercise or defence of legal claims;
- **Right to Restriction of Processing** pursuant to Article 18 GDPR if the accuracy of the data is contested, the processing is unlawful, we no longer need the data and you object to its deletion because you need it for the establishment, exercise or defence of legal claims or you have objected to the processing pursuant to Article 21 GDPR.
- **The right to data portability** under Article 20 GDPR if you have provided us with personal data within the scope of consent under Article 6 (1) GDPR or on the basis of a contract under Article 6 (1) b GDPR and these have been processed by us using automated processes. We will receive your data in a structured, common and machine-readable format or we will transmit it directly to another responsible party if technically feasible.
- **The right to object** under Article 21 GDPR to the processing of your personal data, if this is based on Article 6(1)(1)(e), (f) GDPR and there are grounds for this arising from your particular situation or the objection is directed against direct advertising. There is no right to object if overriding legitimate grounds for processing are demonstrated or the processing is carried out for the establishment, exercise or defence of legal claims. If there is no right to object for individual processing operations, this is stated there.
- **The right to withdraw** pursuant to Article 7(1)(3) GDPR your consent granted with effect for the future.
- **The right to lodge a complaint** under Article 77 GDPR with a supervisory authority if you believe that the processing of your personal data violates the GDPR.

The Supervisory Authority is the Office for Personal Data Protection, address: 27 Pplk. Sochora, 170 00 Prague 7, phone +420 234 665 111, for consultations on GDPR a specially created line

+420 234 665 800 and email: [posta@uouu.cz](mailto:posta@uouu.cz). More information is available on the website of the Office for Personal Data Protection - <https://uouu.gov.cz/kontakt>. Každý A subject of personal data who discovers or believes that the Controller or processor is processing his/her personal data in violation of the protection of the personal life of the subject of personal data or in violation of the law, in particular if the personal data is inaccurate with regard to the purpose of its processing, may request an explanation from the Controller in person or via the contact email address. Said requests will always be duly considered and dealt with by the Controller in accordance with the relevant provisions of the General Data Protection Regulation (GDPR).

The controller shall have the right to request a reasonable fee for the provision of the information, not exceeding the costs necessary to provide the information.

If we process your data on the basis of your consent, you can withdraw this consent at any time with effect for the future. Upon receipt of your withdrawal, we will no longer process your data for the purposes stated in the consent. Please send your revocation or objection regarding advertising to:

**MTR2 Technology s.r.o.,**  
Subject: data protection  
Hlavní 450, 251 01 Herink  
E-mail: [mtr2@mtr2.global](mailto:mtr2@mtr2.global)  
Responsible person: Petr Tůma

#### **XV. PROCESSING OF PERSONAL DATA ON EMPLOYEES**

Information on the processing of personal data of employees and personal data of persons cooperating with the Controller is provided in a special internal document available on the Controller's intranet.

#### **XVI. COOKIES**

The cookie policy can be found [on our website](#).

#### **XVII. UPDATE OF THE POLICY**

We regularly review and update this document and reserve the right to change it. Any changes to this Policy are effective as of the date the updated Policy is posted on the MTR2 Technology website.

This Policy was last updated on 25.3.2024.

Responsible person: Petr Tůma