

# APPENDIX No. 3 TO THE LICENSING CONTRACT - PERSONAL DATA PROCESSING

## HOW ARE YOUR PERSONAL DATA BEING PROCESSED

**By personal data** we refer to any kind of information related to a definite or a definable data subject. A data subject is being regarded as definite or definable, **if the data subject can be directly or indirectly identified** especially via a number, code or one or several elements which are specific to his physical, physiological, psychic, economic, cultural or social identity.

Thus personal data contain especially data of a natural person, his IP-address, but they can also contain information about how such a person uses services, about his/her activities or the preferences of a natural person. Personal data protection is being provided for by the **Regulation (EU) 2016/679 of the European Parliament and of the Council of 27. April 2016 on the protection of natural persons** with regard to personal data processing and the free movement of such data, and repealing the Directive 95/46/EC (general data protection regulation).

## WHAT DOES PERSONAL DATA PROCESSING MEAN?

Personal data processing refers to any activity or set of activities, carried out systematically by a controller or processor with personal data, be it automated or carried out by other means, including especially gathering, storing data on data carriers, providing access, amending or changing, searching, using, handing over, disseminating, publishing, storing, exchanging, classifying or combining, blocking and liquidating.

## PERSONAL DATA PROCESSOR

**The EASY FM s.r.o., Company register Number: 025 15 695, based at: K sadu 754/2a, 182 00 Praha 8, Czech Republic**

a company operating the easyfm.cz website and the SW KLID service, processes your data as a controller, i.e. it defines, how the personal data will be processed and for what purpose.

We are processing personal data performing the role of a processor, i.e. a person entrusted by the client (performing the role of a controller) and this is carried out in connection with operating the SW KLID service. We are processing especially data that have been stored by the client into the SW KLID app about his users – especially contact data (name, surname, e-mail, phone number) or possibly other data of competent persons (service company,

cleaning company, authorized employees), information about the client's behavior as far as the use of the SW KLID app is concerned (last activity, information sent to the client about maintenance/cleaning, etc.), content of uploaded documents.

### **We would like to inform you that**

- We can control the content and in case of any doubts regarding the legality of the processing of personal data pertaining to your users, we may temporarily halt this processing without any entitlement for the compensation of damages,
- Within the SW KLID app, we are prepared to perform your users' rights for repair, adding, liquidating or the entire erasure of personal data.

## **WHICH DATA ARE WE GOING TO PROCESS?**

### **REGISTRATION INTO THE SW KLID APP**

It's about contact data (name, surname, address, e-mail, phone number), accounting and payment information. These data are indispensable for providing the ordered services and for keeping accounts. We are going to process client data throughout the duration of the contract on providing the SW KLID service and for ten years following the contract termination.

### **SENDING THE E-BOOK AND NEWS**

It's about contact data (name, surname, address, e-mail, phone number). These data are indispensable for providing the ordered services. We are going to process client data as long as the client's interest prevails, i.e. until the client undertakes a one-sided action and terminates the news reception. It's possible to do this via the sign-off link contained in any news.

### **REGISTRATION INTO AN EDUCATION PROGRAM**

It's about contact data (name, surname, address, e-mail, phone number), accounting and payment information. These data are indispensable for providing the ordered services and for keeping accounts. We are going to process client data for a period of ten years.

### **BROWSING WEBSITES**

If you are using our services or browsing the [easyfm.cz](http://easyfm.cz) or the [swklid.cz](http://swklid.cz) website, we can collect data regarding your visits and use of services. These data contain your IP-address, your behavior on the websites and your behavior within the SW KLID app. We are gathering these information in an automated manner [via cookies](#) or via tracking technologies, as we intend to provide you the best service possible. We are going to process your data for a period of five years from your last visit of your website.

## YOUR RIGHTS IN CONNECTION TO THE PERSONAL DATA PROCESSING

If we are processing your personal data as a controller, **you are entitled to refer to us at any time** and to make use of your right for an access to the data and for a correction of the data processed by us.

If you have any doubts whether we are processing your data in accordance with the Regulation, you can ask us for an explanation or to amend the defective state, which especially refers to requesting a blockage, repair, requesting the adding or liquidation of personal data, or – possibly – an entire erasure of these data.

## PROTECTION AND SECURITY

We are going to handle both your personal data and your clients' personal data responsibly and in accordance with the Regulation. We are using both automated and non-automated means for personal data processing. All data are stored **on protected servers located exclusively within the European Union**. We are protecting personal data to the maximum possible extent using modern technologies that correspond to the technical development level. We have adopted and are maintaining any possible (currently known) technical and organizational measures that are preventing misuse, damage or the destruction of personal data, especially:

- We are using a multi-level firewall for protecting the servers and this enables an access only for an https port.
- Any communication between servers is encrypted and protected by a virtual private network.
- Access to the data is only possible following a multi-level log-in procedure and only for selected and approved persons.

## WHEN CAN THE PERSONAL DATA BE MADE AVAILABLE?

We can make the data that are processed by us as a controller or processor available exclusively to our colleagues who are providing **administration and technical support** in connection to the SW KLID app, or – possibly – to other persons **and only due to fulfilling our legal obligations**.

We would like to assure you that both our employees and colleagues who are going to process your personal data, are obliged to maintain secrecy regarding the personal data and safety measures, if the disclosure thereof would pose a threat to your personal data. This **secrecy endures also during the period when the contractual obligations are terminated**.

## SW KLID CLIENT SWORN DECLARATION

The client declares that he, as a processor of personal data he stores in the SW KLID app, fulfills all legal obligations requested by applicable legislation, especially by the Regulation on the Protection of Personal Data, which means that:

- he processes personal data of natural persons only upon a valid legal title (who have declared their free and voluntary consent with their personal data being processed and that this client is able to present this consent, or when the processing is indispensable for the client's legal duties to be fulfilled, or possibly due to other reasons according to Article 6 of the Regulation,
- he does not insert sensitive personal data into the SW KLID app, i.e. personal data referring to nationality, race or ethnic origin, political opinion, membership in trade unions, religion and philosophical opinion, criminal convictions, health status and sexual life of the data subjects or genetic data about the data subjects, biometrical data,
- he complies with the information requirement regarding his users and other natural persons he inserts into the SW KLID and provides for the performance of their rights according to the Regulation on the Protection of Personal Data,
- he fulfills any other duties of a personal data controller according to the Regulation on the Protection of Personal Data, commits himself to consider any changes in the SW KLID software within the personal data evidence and to do so within a period of max. 24 hours from the adoption of the change.

If you as an SW KLID app client breach your personal data controller duties in the sense of the Regulation on the Protection of Personal Data, and a damage occurs to us in direct connection to this breach, then you are obliged to compensate us such a damage in the entire scope.