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## PRINCIPLES OF PERSONAL DATA PROCESSING

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The company **Mayr-Melnhof Pellets Paskov s.r.o.**, with its registered office at Staříč, Staříč 544, postal code 739 43, company identification number: 2776947, company registered in the Commercial Register maintained by the Regional Court in Ostrava, Section C, Insert 41403 (hereinafter referred to as “MMPP”) as a personal data controller, declares that all processed personal data are considered by MMPP to be strictly confidential and are treated in accordance with the applicable data protection laws, in particular the Act No. 101/2000 Coll., on the Protection of Personal Data, as amended (hereinafter referred to as the “Act”) and Regulation (EC) No 2016/679 of the European Parliament and of the Council concerning the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter referred to as the “Regulation”).

These principles of personal data processing apply to all personal data collected by MMPP on the basis of performance of a contractual relationship, legal obligation, legitimate interest, or the consent granted and describes the methods of use and protection of personal data by MMPP.

### 1. PRINCIPLES OF PERSONAL DATA PROCESSING

When processing personal data, MMHP respects these principles:

- **The principle of lawfulness**, which requires the processing of personal data always in accordance with legal regulations and on the basis of at least one legal title.
- **The principle of fairness and transparency**, which imposes an obligation to process personal data in an open and transparent manner and to provide information on how they are processed together with information on whom personal data will be disclosed.
- **The principle of purposeful restriction** that allows the collection of personal data only for a clearly defined purpose.
- **The principle of data minimization**, which requires to process only personal data that is necessary, relevant, and proportionate to the purpose of processing.
- **The principle of accuracy**, which requires that all reasonable measures be taken to ensure the regular updating or rectification of personal data.
- **The principle of storage restriction** that requires storing personal information only for the time necessary for the specific purpose for which it is processed.
- **The principle of integrity and confidentiality, non-contestability and accessibility** that requires personal data to be secured and protected against unauthorized or unlawful processing, loss or destruction.
- **The principle of responsibility**, which imposes an obligation to be able to demonstrate the compliance of all the conditions listed above.

**2. PROCESSED PERSONAL DATA**

MMPP is authorized to process the following personal data according to the purpose for which it has been acquired by individual data subjects:

Information of data subjects	Purposes of processing
Name, surname/title	Contract negotiation. Performance of a contractual relationship. Accounting and tax purposes. Performance of other legal obligations. Creating internal databases, analyses, prognoses, and statistics.
Address	Contract negotiation. Performance of a contractual relationship. Accounting and tax purposes. Performance of other legal obligations. Creating internal databases, analyses, prognoses, and statistics.
Bank details	Performance of a contractual relationship. Accounting and tax purposes.
Business ID no. (IČ), tax ID no. (DIČ)	Performance of a contractual relationship. Accounting and tax purposes. Performance of other tax obligations.
E-mail	Contract negotiation. Performance of a contractual relationship. Managing user accounts for products and services.
Fax	Performance of a contractual relationship.
Telephone number	Contract negotiation. Performance of a contractual relationship. Performance of other legal obligations.

**3. PURPOSES OF PERSONAL DATA PROCESSING**

Personal data may be processed by MMPP for the following purposes:

- Contract negotiations.
- Performing a contractual relationship.
- Displaying only ads based on the interests of a visitor to the website.
- Sending business messages and offering products and services from MMPP’s portfolio.
- Accounting and tax purposes (accounting in the sense of accounting and tax legislation).
- The fulfilment of other legal obligations (other statutory duties performed by the MMPP include, e.g. the provision of information to law enforcement authorities and other public authorities).

The rules under which MMPP shares personal data with their processors are divided into two basic categories:

The first category involves the sharing of personal data within the European Union and the European Economic Area, the second category then sharing to third countries outside the

European Union and the European Economic Area, and sharing with international organizations.

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In order to share personal data with the processor within the European Union and the European Economic Area, it is necessary to ensure that it concerns:

- Sharing of personal data for a specific purpose (such as preparing a marketing campaign),
- Transferring only clear and necessary scope of personal data,
- Transferring performed on the basis of a duly concluded contract for the processing of personal data,
- Secure sharing (encryption, pseudomization, etc.).

In case of sharing of personal data to third countries outside the European Union and the European Economic Area and international organizations, it is only possible to do so on the basis of standard contractual clauses, i.e. a model contracts issued by the European Commission, and it will exclusively concern entities based in countries that according to the European Commission's decisions ensure adequate protection of personal data.

When processing personal data, **there is no** automated, individual decision-making, even though profiling.

## 4. LIST OF PROCESSORS

Within the MMPP, the personal data of data subjects are made available only to authorized MMPP employees or to the employees of the processors only to the extent necessary for processing purposes. MMPP is authorized to provide personal data to third parties, if this is necessary for the performance of a contractual relationship or legal obligations. These are the following categories of recipients:

- External accountants, tax advisers and legal advisers;
- Under certain conditions, MMPP is authorized to transfer certain personal data under applicable laws, for example to law enforcement authorities and other public authorities.

## 5. RETENTION PERIOD

Personal data are processed by MMPP and retained for the period necessary to ensure all the rights and obligations arising from the contract, i.e. at least for the duration of ensuring the implementation of the contract concluded with its business partner and for the period during which the company MMPP is obliged to as a controller to retain in accordance with generally binding legal regulations or for the period, for which permission has been granted for processing. In other cases, the processing time ensues from the purpose of processing or is given by the data protection legislation.

## 6. RIGHTS OF DATA SUBJECTS

In particular, data subjects have the following rights in accordance with the Regulation:

### **Right to access personal data:**

Pursuant to Article 15 of the Regulation, the data subject has the right to access personal data, which includes the right to obtain from MMHP a confirmation of processing personal data, information on processing purposes, categories of the personal data concerned, recipients to whom personal data was or will be made accessible, the envisaged processing period, the existence of the right to request from the controller the rectification or erasure of personal data relating to the data subject or the limitation of their processing, or contesting such processing, the right to file a complaint with the supervisory authority about any available information on the source of personal data, if not obtained from the data subject, the fact that automated decision-making, including profiling is not carried out, on suitable safeguards when transferring data outside the EU. This right applies if the rights and freedoms of others are not adversely affected. In the event of a repeated request, MMHP will be entitled to charge a reasonable fee for a copy of the personal data. The right to confirm the processing of personal data and the information can be exercised in writing at the registered address of MMPP.

### **Right to rectification of inaccurate data:**

Pursuant to Article 16 of the Regulation, the data subject is entitled to rectification of inaccurate personal data processed by the controller.

### **Right to erasure:**

Pursuant to Article 17 of the Regulation, the data subject has the right to erasure of personal data concerning him/her if the controller does not prove legitimate reasons for processing such personal data.

### **Right to restriction of processing:**

According to Article 18 of the Regulation, the data subject has the right to restrict the processing until the resolution of the complaint if he contests the accuracy of the personal data, the reasons for the processing, or if he raises a written objection to their processing.

### **Right to notification of rectification, erasure and restriction of processing:**

Pursuant to Article 19 of the Regulation, the data subject has the right to be notified by the controller in the event of rectification, erasure or restriction of the processing of personal data. This right applies unless it proves impossible or requires unreasonable effort.

### **Right to object the processing of personal data:**

Pursuant to Article 21 of the Regulation, the data subject has the right to object to the processing of his personal data because of the legitimate interest of the controller. If the controller does not prove that there is a serious legitimate reason for processing that prevails over the interests or rights and freedoms of the data subject, the controller shall terminate the processing based on an objection without undue delay.

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### Right to revoke consent with the processing of personal data:

Consent with personal data processing for business purposes effective from 25 May 2018 may be revoked at any time after that date. A revocation must be made in an explicit, comprehensible and specific manner, either in person, in writing or electronically, by sending the application to [paskov@mm-holz.com](mailto:paskov@mm-holz.com).

### Right to turn to the Office for Personal Data Protection:

In case of doubt about compliance with the obligations related to the lawful processing of personal data, the data subject can contact the Office for Personal Data Protection with the possibility of filing a complaint with this supervisory body.

At the same time, MMHP cautions that the data controller processes the data with the consent of the data subject, except in cases where the processing of personal data does not require the consent of the data subject. In accordance with Article 6 (1) of the GDPR, the controller may, without the consent of the data subject, process the following data:

- The data subject has given consent for one or more specific purposes,
- Processing is necessary for the performance of the contract to which the data subject is a party or for the implementation of measures taken prior to the conclusion of the contract at the request of that data subject,
- Processing is necessary to meet the legal obligation that applies to the controller,
- Processing is necessary to protect the vital interests of the data subject or other natural person,
- Processing is necessary to carry out a task carried out in the public interest or in the exercise of public authority entrusted to a controller,
- Processing is necessary for the purposes of the legitimate interests of the relevant controller or third party, except when the interests or fundamental rights and freedoms of the data subject that require the protection of personal data prevail over such interests.

In the event of any queries, comments, and requests regarding these facts, you may contact MMPP through an email address [paskov@mm-holz.com](mailto:paskov@mm-holz.com) or telephone number: +420 558 452 000.

In Staříč on 16 May 2018.

  
Ing. Marie Wagnerová  
Company's Executive Director

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Company's Executive Director