

Information on the Processing of Personal Data (GDPR)

1 Purpose of this Document

The purpose of this document is to provide you, customers of GEM System a.s., with clear and comprehensible information about:

- *what personal data we collect and for what purposes,*
- *how we process personal data and ensure their protection,*
- *to whom we disclose personal data,*
- *what your rights are in relation to the personal data we process.*

If you do not find answers to your questions concerning your personal data here or would like further clarification, ***please contact us by email at info@gemsystem.cz.***



2 Processing of Personal Data

In the course of business dealings and contract fulfillment, we process personal data to prepare and execute agreements with you (if you are a business partner – natural person), or based on the legitimate interest of

our business partners (if you are a contact person of our business partner), and based on our legal obligations. This applies especially to:

- *use of personal data in contract execution and business dealings,*
- *exchange of banking and identification information,*
- *activities arising from contractual relationships such as invoicing, executing bank transfers, and other contractual duties,*
- *data storage and archiving in accordance with legal requirements.*

We process your identification data (e.g., name, surname, titles, VAT and company ID for business persons), contact details (e.g., addresses, telephone, email), company and job-related data (e.g., employer, position, department, decision-making authority), records of your communication with us (emails, call logs), and other documents provided by you containing personal data.

For employment relations, we also process additional

types of personal data (e.g., date of birth or personal identification number, place of birth, nationality, marital status, education, and documents provided by you containing personal data).

Data is retained for 3 years from last use, and for accounting and tax documents, for the legally mandated retention periods.

Processing Based on Legitimate Interest

Personal data processing is necessary for the purposes of legitimate interests, especially for: protection of our assets, enforcement of legal claims, identity verification, and risk management.

Phone calls to our helpdesk/dispatch center may be recorded and stored for 3 months after resolution. Longer retention only applies in case of disputes, until resolution.

Processing Based on Consent

Processing not arising from law or legitimate interest requires your explicit consent. This includes:

- *sending invitations to client events, seminars, trainings, workshops, or exhibitions,*
- *thank-you gifts or symbolic gestures of appreciation.*

You may withdraw your consent at any time, e.g., by email to info@gemsystem.cz or by letter to: Štětkova 1638/18, 140 00 Prague 4 – Nusle.

Automatic Processing Including Cookies

We may collect information during website visits (e.g., IP address, time and date of access, OS, language settings, browser type), including data about your activity on our website. If accessing via mobile device, we may process anonymized data about such devices.

If cookies are enabled in your browser, we consider this as consent. We only use anonymized cookies and cannot identify individual behavior. We use functional and analytical cookies (e.g., device fingerprinting). Analytical

cookies are anonymized (e.g., by Google Inc.) and no longer considered personal data. These may also be used for advertising purposes. Cookie validity: up to 24 months.

You may withdraw your consent to cookies by clearing them or disabling them in your browser. Use incognito mode to avoid tracking. Use Google's tools to control analytics cookies.



3 Processing method

Your data is processed manually and electronically in secure systems with strict physical, technical, and

procedural controls. All personnel are bound by confidentiality.

4 Disclosure

We may disclose data to processors (software/service/application providers, subsidiaries, even if not current-

ly used). If outside the EEA, we ensure adequate data protection or appropriate safeguards.

5 Your Rights

You have the right to:

- *request information about the data we process,*
- *request explanation of the data processing,*
- *access, update, or correct your data,*
- *request data deletion,*
- *withdraw your consent at any time (if applicable),*
- *raise concerns with us or the Data Protection Authority.*

You can exercise your rights by contacting the Controller – GEM System a.s., via email: info@gemsystem.cz or by letter to: **Štětkova 1638/18, 140 00 Prague 4 – Nusle. We will respond without undue delay.**

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