# Information on the processing of personal data

(within the scope of EU Regulation 2016/679 GDPR)

This document was produced by **Trigama International s.r.o.**, tax number 02184117, with its registered office at Pernerova 691/42, Prague 8, Post Code 186 00, as a manager of personal data (further referred to as Trigama), in order to provide comprehensive information on the method and purpose of personal data processing and related data..

At Trigama, personal data is processed transparently, correctly, ethically and in accordance with processing standards and applicable laws. Trigama does not collect and store data that is not necessary for the performance of the contract, or fulfillment of legal obligations, or data whereby its storage and process has not been consented to.

## What personal data do we store and for what purposes do we use it?

- We always store personal data only to the extent necessary for the performance of contracts, accounting purposes, fulfillment of legal and tax obligations, for the proper functioning of internal processes, and for the protection of rights or effective communication, and always strictly to the maximum extent permitted by law.
- This information has usually been provided to us for the purpose of concluding and fulfilling contracts or for the of offering business activities. All processed data are necessary for us to carry out these activities and are primarily used in order to fulfill the contractual obligations and other obligations arising from law.
- Most often we process:
  - personal data in order to identify the data subject such as full name, academic title, tax ID number, date of birth, personal ID, business address or address of residence;
  - contact and location data such as telephone number, email address, IP address
  - data arising from buisness matters such as bank details, data about performance, rates, invoicing and reporting
  - Data provided with express consent that goes beyond contracts and laws such as audio-visual recordings.
- We obtain all personal data only directly from the data subject, from contact forms, from public registers and records, or from social media networks. No personal data is used for profiling and is not processed automatically or in a collective form.

#### How long will we keep personal data?

- We keep accounting documents and accounting records with the stated personal data even after the termination of contracts for the period specified in the internal rules concerning data disposal and in accordance with legal archiving periods.
- We keep contact data for the same period as the archiving period of accounting documents. Contact details can
  often be contained in documents that must be archived due to a legal obligation, and we consider the retention
  of contact details for this period to be in our legitimate interest.
- Other documents which contain personal data (eg CV, contact form) will be erased following the end of the contractual relationship.

#### Who can we give personal data to?

- During the internal processing and storage of personal data, this data is made available only to persons authorized by Trigama who handle the data in the performance of their work tasks (ie accountant, administrator).
- Personal data may be contained in documents that we pass on to state authorities on the basis of legal duties.
- We transfer personal data to clients or other third parties only to the extent necessary and only in cases where this is necessary for the fulfillment of Trigama's obligations and always only with the consent of the data subject
- Trigama clients and service providers are always companies that are permitted to handle personal data according to GDPR. We do not transfer any personal data outside the European Economic Area.



#### Where do we store personal data and how do we protect it?

- We have technical and organizational measures in place to protect all personal data as much as possible, in particular against unauthorized access and data leakage. We regularly evaluate the effectiveness of these measures and take measures against newly identified or emerging risks.
- The internal company infrastructure (systems used internally, e-mail accounts) is accessible only to authorized persons via encrypted protocols (passwords, certificates).
- The accounting system is password protected and encrypted. The backups of the accounting system are stored in the internal company infrastructure. Personal data stored on the computers of authorized persons are also protected by password and encryption.
- Paper documents that contain personal data are suitably secured according to their nature, for example they are stored in a locked registered box.

### What are your rights?

- Upon request, you have the right to obtain information about the data recorded about you, the origin, the purpose of processing and storage and the recipients of this data.
- You have the right to correct personal data if this data is inaccurate or out of date. If there is no longer a legal reason for the processing of personal data or it is proven that the data is being processed illegally, you have the right to request the deletion of the data (the right to be forgotten). Should the deletion of data require a disproportionate effort, the right to restrict processing may be exercised.
- You have the right to object to the processing of data
- You have the right to portability, ie the right to obtain personal data that you have provided to us in a structured, commonly used and machine-readable format and to pass this data on to another administrator.
- You have the right to withdraw consent to processing. Withdrawal of consent does not affect the lawfulness of processing until the effective date of withdrawal of consent.
- An e-mail account; gdpr@trigama.eu has been set up in order to exercise these rights and for your questions. The deadline for processing requests for information is one month. The period may be extended by two months in exceptional circumstances, of which the data subject must be informed, including the reason for the extension.
- You have the right to file a complaint with the Data Protection Authority if you believe that your rights have been violated.