

**Assessment of the impact of activity on the protection of personal data**

**1. Subject of the protection of personal data of  
Hexpol Compounding s.r.o.**

The subject of the protection of personal data shall include:

**1.1 identification data of employees** that shall mean in particular the academic title(s), first name(s) and surname, date of birth, Birth Certificate No., place of birth, permanent address, citizenship, marital status, name(s) and surname(s) and number of children, previous job, information on health insurance company, information on the wage or salary amount, bank details, level of education attained, telephone number(s), e-mail addresses, user name and password, photocopy of the identity card, decision of a court on enforcement of a decision;

out of which **sensitive data**, such as sentence for a criminal act (a copy of the entry in the Criminal Register) and information on the health status (including information on pregnancy and information relating to industrial injuries), biometric data;

**1.2 identification data on business partners** that shall mean self-employed persons, in particular their academic title(s), first name(s) and surname(s), date of birth, Company ID, VAT Reg. No., place of business;

**1.3 identification data on business corporation members**, in particular their academic title(s), first name(s) and surname(s), date of birth, permanent address, citizenship;

**1.4 identification data on persons with another relation to the company Hexpol Compounding s.r.o.** - in particular IT service suppliers, security service, quality management suppliers, cleaning service when legal relationships with them are governed by a separate contract;

**1.5 contact details** that shall mean personal data enabling the contact with employees, business partners and business corporation members, in particular their e-mail address, telephone number, permanent address;

**1.6 data on purchase orders of business partners** that shall include in particular data on trade payables and any other legal negotiations, payments including the bank account number;

**1.7 sensitive data on health status** that shall include in particular information on health limitation relating to any handicap or pregnancy provided that the subject has disclosed these data to the company;

**1.8 data from the evaluation of provided trade payables:** quality reports – data of employees of any other companies (name and surname);

**1.9 data related to the operation of camera system and telephone sets,** such as recordings from camera systems in the company premises, records from statements of telephone service utilisation (mobile phones).

## **2. Purpose, scope and source of personal data processing**

The company Hexpol Compounding s.r.o. processes personal data based on the fulfilment from contracts, for reasons of legitimate interest or for reasons of compliance with a legal obligation or based on the authorised person's consent.

### **2.1 Personal data processing based on a legitimate interest in the case of concluding business relations and relations obligation with a self-employed person**

The company keeps identification and contact details of a business partner and data on his purchase orders based on a legitimate interest of the company (without the subject's consent) for the purpose of the protection of legal claims and internal record-keeping and control.

Legitimate interests shall be here the protection of legal claims and control of proper provision of services. For the purpose of the protection of legal claims and internal record-keeping and control, the company processes data for the period of limitation – three years and one year after its lapse with respect to claims made at the end of the period of limitation. In the event of initiating any judicial, administrative or any other proceedings, the company processes personal data to a necessary extent throughout the duration of such proceedings and the remaining part of the period of limitation after their termination. For any other specified purposes, personal data shall be used by the company for a period of three years after placing a purchase order. The authorised person – subject shall have the right to file an objection against these proceedings carried out based on a legitimate interest.

### **2.2 Processing based on compliance with legal obligations**

The company processes personal data for reasons of the duty laid down by the act, defined in particular in the Act No. 89/2012 Coll., the Civil Code, the Act No. 634/1992 Coll., on the protection of consumer, the Act No. 235/2004 Coll., on value-added tax, the Act No. 563/1991 Coll. on accounting; all as subsequently amended. For these purposes, we use personal data for a period of ten years.

### **2.3 Processing based on the authorised person's consent**

These personal data are processed by the company for a necessary period of time or until the authorised person's consent is withdrawn.

### **2.4 Processing based on legitimate interests**

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Company ID: 26447461, VAT Reg. No.: CZ26447461  
The company entered with the Regional Court in Ostrava, File No. C  
27563  
Executive Directors: Miloš Pitela, Carsten Rüter, Ralph Wolkener, Mikael  
Bernt Torsten Fryklund

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The company processes **recordings from the camera system** where any authorised persons can be recorded, based on a legitimate interest for the purpose of the protection of life, health of persons moving around in the company premises and surroundings, and for the purpose of the property protection.

For this purpose, the company shall keep personal data for a period of maximally 43 days. The authorised person shall have **the right to file an objection** against this processing.

### **3. Subjects processing personal data and recipients of personal data processing**

The company Hexpol Compounding s.r.o. processes personal data as a **controller** that determines the purpose of personal data processing, i.e. what personal data it collects, it determines means of processing and is responsible for their proper performance.

The company can also hand over personal data to any other subjects that also act as a controller, based on a contractual relationship concluded with them, when it mainly includes IT service suppliers, personal and wage issues processors, fire protection services and occupational safety and health protection, environmental protection services.

For personal data processing, the company also uses services of any other processors who process personal data only as per the company's instructions and for the defined purposes when such processors shall include:

1. affiliated companies and parent company (companies in the group);
2. providers of accounting services and tax advisory, auditors, personnel and wage issues processors, law offices, security agency;
3. IT technology suppliers.

### **4. Handing over of personal data outside the EU**

The company can also hand over personal data to any third countries outside the European Economic Area (EEA) that, nevertheless, ensure the corresponding level of the protection of personal data according to the legislation of each individual country.

### **5. Personal data processing**

The company shall safeguard the following rights of the subject of personal data resulting from the valid legal regulation:

## 5.1 Right to access

The subjects personal data of which are processed have the right to know what data about them are processed, for what purpose, for how long, where personal data are obtained, to whom they are handed over, and what other rights relating to personal data processing these subjects have, by means of this assessment of the impact of activity on the protection of personal data.

In accordance with the law, subjects have the possibility to ask for the confirmation whether personal data that concern them are processed by the company or not, and if they are processed by the company, they have the right to have the access to these personal data. Under the right to access, subjects have the right to ask for a copy of personal data processed.

## 5.2 Right to correction

If the data subject ascertains that personal data processed about it by the company are inaccurate or incomplete, the data subject has the right so that the company corrects or completes them without undue delay.

## 5.3 Right to erasure

Subjects of the protection of personal data have the right to erasure of their personal data for the following reasons:

- using personal data is not necessary any more for the purposes for which they have been processed;
- if a subject withdraws its consent with the personal data processing, while they are data for the processing of which the consent is necessary, and at the same time there is not any other reason why the company needs to process these data any further;
- if a subject uses its right to raise an objection against the processing of personal data that the company processes based on legitimate interests and the company ascertains that it has no such legitimate interests any more that would justify this processing, or
- if a subject supposes that personal data processing carried out ceased to be in accordance with the generally binding regulations.

## 5.4 Right to processing restriction

The company can use the right to personal data processing restriction. A subject of the personal data processing can demand in certain cases so that personal data are marked, and these data are not the subject of any other processing operations; in this case, however, not forever (as in the case of the right to erasure), but for a limited period of time.

The personal data processing must be restricted by the company when:

- a subject denies exactness of personal data until the agreement is reached what data are true;

- personal data of a subject are processed by the company without any sufficient legal basis, but the subject will prefer only restriction of such data to their erasure;
- the company does not need personal data of the subject any more for the aforementioned processing purposes, but the subject requires them for determination, performance or defence of its legal claims, or
- a subject raises an objection against the processing. For the period for which the company examines an objection, whether the objection of the subject is justified, the company shall be obliged to restrict the personal data processing.

### **5.5 Right to transferability**

The subject has the right to receive from the company all personal data that the subject has provided to the company and that the company processes based on its consent and based on the performance of the contract.

### **5.6 Right to raise an objection against processing**

The subject has the right to raise an objection against the processing of its personal data carried out based on a legitimate interest of the company.

### **5.7 Right to file a complaint**

By exercising rights in the aforementioned manner, the right of the subject to file a complaint with the competent supervisory authority shall not be affected in any way. This right can be exercised by the subject in particular if it supposes that its personal data are processed by the company in an unauthorised manner or at variance with the generally binding legal regulations. A complaint against the personal data processing carried out can be filed by the subject with the Office for Personal Data Protection, with its registered office at Pplk. Sochora 27, 170 00 Prague 7.

### **5.8 Place of exercising the subject's rights**

In all matters related to the processing of personal data of the subject, either it is a question, exercising of a right or filing a complaint, the subject can contact via e-mail address: [gdpr-uni@hexpol.com](mailto:gdpr-uni@hexpol.com) or the data box 2sq98wv. The current contact information is accessible at the company's websites.

The application of the subject shall be handled by the company without undue delay, however, maximally within one month. In exceptional cases, in particular for reasons of complexity of the requirement, the company shall be authorised to extend this time-limit by another two months. The company shall inform the subject of such possible extension and its justification.

In Uničov, on 24 May 2018