

PRINCIPLES OF PROTECTION AND PROCESSING OF PERSONAL DATA

This document has been prepared by RUDBECIA a.s., company ID: 242 54 118, with registered office: Prague 1 - Nove Mesto, Opletalova 1323/15, Prague City District, Postal Code 11000 (hereinafter referred to as "Rudbecia"), in order to provide complete information on the methods and conditions of protection and processing of personal data by the company. This document serves for your better orientation in the issue of personal data protection and represents a tool for easy exercise of your rights and resolution of your requests.

Contact details of RUDBECIA a.s.

Email: info@oldroyalpost.com

1) Legal framework for processing

Rudbecia processes your personal data always and exclusively in accordance with the applicable legislation, i.e. Regulation (EU) No. 2016/679 of the European Parliament and of the Council (GDPR). Rudbecia places special emphasis on the security of processing and protection of your personal data, the protection of your personal data is an absolute priority for us. Rudbecia is obliged to comply with other legal regulations in the conduct of its business activities beyond the GDPR, which also set out obligations that affect the processing of personal data and are binding on Rudbecia.

Rudbecia is subject to the supervision of the Office for Personal Data Protection of the Czech Republic, to which you can lodge a complaint if you are not satisfied with Rudbecia's procedures in exercising your rights or processing your personal data.

2) Who processes the data

Rudbecia is the controller of your personal data. You can therefore exercise all your rights and direct your questions to this Administrator. Rudbecia processes your personal data through its authorised employees and selected collaborators, and it is always the case that these persons:

- a) are carefully selected and screened, are of the good integrity and are competent to ensure the proper protection of your personal data;
- b) are bound by the obligation of confidentiality under severe sanctions;
- c) are bound by strict processing rules and are also obliged to ensure all the security standards set by Rudbecia and regularly checked by Rudbecia;
- d) always process only the extent of your personal data that is necessary for the performance of the processing operation, and only for the necessary period of time;
- e) Your personal data is only ever processed in the secure environment of the Rudbecia information system on secure computing resources;
- f) are required to keep a consistent record of all personal data processing activities;
- g) are subject to regular and ongoing monitoring of their compliance with Rudbecia's processing obligations and security standards.

3) What personal data Rudbecia processes

In accordance with the relevant legislation, Rudbecia processes only such personal data as is required by the relevant legislation and such data as is necessary for the performance of Rudbecia's business activities. We process such Personal Data prior to entering into a contract to contact you on the basis of an expression of interest in our services and for the purpose of fulfilling the obligations arising from the contractual relationship.

We process the following categories of personal data:

- 1) Identification data - personal data used to uniquely identify you (name, surname, maiden name, title, birth number, date of birth, number of identity document (ID card, passport number or other similar document), signature; in the case of a natural person running a business, also tax identification number, ID number, registered office address),
- 2) contact data - personal data used to ensure contact with you (permanent address, correspondence address, telephone number, e-mail address, data box ID),
- 3) other personal data defined by specific legal regulations - other personal data whose use is always linked to a specific purpose of processing - to a specific agenda.

Rudbecia is obliged to process the personal data listed above even without your consent, as Rudbecia is obliged to process them in accordance with the relevant legal regulations, or Rudbecia is entitled to process them in connection with the performance of a contractual obligation or on the basis of a legitimate interest (see below). However, it is still solely your choice whether or not to provide Rudbecia with your personal data. However, if you do not provide personal data to the extent requested, one of the following two situations may occur. Rudbecia:

- 1) may not provide the service in question if a specific regulation so provides; or
 - 2) is entitled not to conclude the transaction or contract or not to provide the service.
- 4) Personal data for Rudbecia's marketing activities - personal data that Rudbecia processes for the purpose of Rudbecia's marketing activities, in particular sending commercial communications or advertising (name, surname, telephone number, e-mail address, correspondence address).

Rudbecia is entitled to process the personal data referred to above only with your consent, and always for the necessary period of time, but no longer than the duration of such consent. Consent to processing is entirely voluntary. The above applies with the exception of the sending of commercial communications by e-mail, which may be sent to Rudbecia's clients in accordance with Section 7 of Act No. 480/2004 Coll., on certain information society services and on amendments to certain acts, as amended, also without prior express consent and until the data subject has expressed his or her disagreement with such sending.

Rudbecia always processes personal data only to the extent necessary for the fulfilment of the given purpose, personal data obtained for one purpose may not be used for another purpose unless these purposes are mutually compatible.

Rudbecia generally only processes personal data that you have provided to Rudbecia.

4) Legal grounds and purpose for processing the personal data

The legal basis for processing the personal data is:

- 1) the performance of their own business activities;
- 2) compliance with legal obligations;
- 3) compliance of contractual obligations;
- 4) protection of persons, property, data, trade secrets and legitimate interests of persons, including proper identification and authentication of persons acting;
- 5) determining, enforcing and defending Rudbecia's legal claims;
- 6) for the purposes set out in points 1) to 5), Rudbecia is entitled to process your personal data in accordance with the GDPR, possibly without your consent;

- 7) Marketing events and promotional activities of Rudbecia - sending marketing offers, advertising, sales events, events to raise brand awareness and support and develop sales, promotion within the Internet environment, or other purposes.

For the purposes set out in paragraph 7, Rudbecia processes personal data only with your consent. Rudbecia is also always entitled to process the personal data (where relevant) for the purpose of establishing, exercising and defending its own legal claims, even if the personal data was obtained for another purpose. Rudbecia is entitled to do so if the original purpose and the purpose of defending the legal claims are in any way related or consequential.

5) On what legal basis and for how long Rudbecia processes personal data

Rudbecia processes personal data within the meaning of Article 6 or Article 9 of the GDPR on the following legal bases:

- 1) consent of the data subject - personal data are processed on this legal basis if there is no other legal basis for processing (if it is not possible to apply it), and always for the duration of the purpose for which the personal data were obtained, but no longer than until the consent is withdrawn, provided that in such cases of processing you always have the right to withdraw your consent (the methods of withdrawing consent are listed below),
- 2) performance of a contractual obligation - if a contract has been concluded between you and Rudbecia to which you and Rudbecia are parties, Rudbecia is entitled to process the personal data it has obtained in the performance of the contract, or which are necessary for the exercise of rights and obligations under the contract, for the duration of the relevant contract,
- 3) compliance with a legal obligation - Rudbecia is obliged to process the personal data selected if it is obliged to do so under the relevant legislation for the period of time specified in the relevant legislation.
- 4) Rudbecia's legitimate interest - in this case, Rudbecia processes personal data for the duration of its legitimate interest. If you object to such processing on the basis of your individual situation and Rudbecia accepts this objection after due consideration, then Rudbecia is obliged to terminate the processing. The legitimate interests of Rudbecia shall be understood to mean, in particular, the legitimate interest:
 - a) on the performance of their own business activities,
 - b) for the establishment, exercise and defence of legal claims of Rudbecia, in which case the scope of the personal data processed is limited to the minimum necessary and access to personal data is further limited to specified persons only (typically, if a contract has been concluded between you and Rudbecia to which you and Rudbecia are a party, Rudbecia processes certain personal data obtained in the course of activities under such contract even after its termination, since it is after its termination that you and Rudbecia may assert your claims within the statutory limitation periods),
 - c) to protect persons, property, data, trade secrets and legitimate interests of persons, including the interest in proper identification and authentication of persons acting.

Each personal data may be processed on more than one legal basis. Any personal data may be processed if there is at least one legal basis for processing it. If the last legal basis for processing the personal data ceases to exist, the personal data must be disposed of properly.

6) To whom personal data may be transferred

Rudbecia is entitled to disclose personal data to the following entities:

- 1) to state authorities and other entities in the performance of a legal obligation within the meaning of the relevant legislation;

- 2) to processors of personal data on the basis of a written contract for the processing of personal data and the provision of sufficient technical and organisational safeguards to protect the personal data (e.g. IT service providers, accountants, etc.);
- 3) employees or other persons in a similar contractual relationship with Rudbecia for the purpose of performing their duties on behalf of Rudbecia;
- 4) to other entities where necessary for the establishment, exercise or defence of Rudbeck's legal claims (e.g. courts, bailiffs, lawyers, etc.);
- 5) with the consent of the data subject to other persons;

it is always the case that personal data are only provided to the above-mentioned recipients to the extent necessary for the stated purpose and for the necessary period of time.

Rudbecia does not transfer your personal data outside the European Economic Area.

7) Personal data security principles

Rudbecia is rigorous in complying with all security and organisational measures it has put in place to protect personal data.

Rudbecia regularly and consistently checks compliance with security and organisational measures to ensure the protection of personal data, regularly evaluates the findings and updates its security and organisational measures as necessary.

Personal data is processed exclusively by authorised persons, who are consistently checked by Rudbecia both before and during the processing. All persons who have the access to personal data are bound by confidentiality obligations under strict sanctions.

8) What your rights are and how you can exercise them

You may exercise all of the following rights granted to you by law under the conditions set out below regulations governing the protection of the personal data, in particular the General Data Protection Regulation

(GDPR):

- 1) the right to clear, transparent and comprehensible information about how your personal data is used and what your rights are;
- 2) the right to withdraw your consent to the processing of personal data at any time, free of charge, by post, e-mail or in person at our address below;
- 3) the right to access to personal data and to be provided with other information related to its processing by the Company or its processors;
- 4) the right to rectification of incorrect and incomplete personal data;
- 5) the right to erasure of personal data, in particular if (i) they are no longer necessary for further processing; (ii) consent to their processing has been withdrawn; (iii) the data subject has legitimately objected to their processing; (iv) they have been unlawfully processed; or (v) they must be erased pursuant to law;
- 6) the right to restrict the processing of personal data where (i) the data subject has contested the accuracy of the personal data for a period of time until the Company has verified its accuracy; (ii) the processing is unlawful; (iii) the Company no longer needs the personal data but the data subject needs the personal data for the purposes of asserting his or her legal claims; or (iv) the data subject objects to the processing of the personal data for a period of time until the Company has verified that the legitimate interests of the Company outweigh the interests of the data subject;
- 7) the right to object to the processing of personal data if it is processed for the purposes of the Company's legitimate interests. If you object to further processing for direct marketing purposes, the personal data will not be further processed for these purposes;

- 8) the right to obtain your personal data and to transfer it to another controller, subject to compliance with the legal conditions;
- 9) the right to lodge a complaint with the Office for Personal Data Protection, located at Pplk. Sochora 27, 170 00 Prague 7, www.uoou.cz, if you believe that the Company is in breach of its obligations under the data protection legislation.

We will respond to your request to exercise your rights within the statutory time limit, usually no later than 1 month after receiving the request. Should our response require longer in exceptional cases, we will inform you of this.

9) Where you can direct any questions, complaints or disagreements

If you wish to exercise any of your rights in relation to the processing of your personal data or have any other query or complaint regarding the processing of your personal data, please contact us by post, telephone or email at the contacts listed in the header of this document.

If you disagree with Rudbecio's approach to dealing with or protecting your rights or processing your personal data, or if you have other observations or comments, you can use the email address info@oldroyalpost.com to send us your comments. We will address each of your comments.

10) Final provisions

By submitting an order from the online order form, you confirm that you are aware of the terms of the privacy policy and that you accept it in its entirety.

You agree to these terms and conditions by checking the consent box via the online form. By checking the consent form, you confirm that you are aware of the privacy policy and that you accept it in its entirety.

The administrator is entitled to change these conditions. It will publish the new version of the Privacy Policy on its website or send you a new version of the Privacy Policy to the email address you have provided to the Controller.

These terms and conditions take effect on 27.3.2023.