



Processing of personal data and their protection

About us

The personal data you provide are processed by Kofola ČeskoSlovensko or its subordinate organizations (hereinafter referred to as “Kofola”).

Personal data processing is a necessary part of our activity. Without providing personal data and without processing it, we would not be able to provide you with our services, provide a gift, enter into a contractual relationship with you and fulfil the obligations arising from it. If your consent is required for the processing of personal data, we will not enforce the consent in any way or make it subject to a threat of refusal to enter into a contractual relationship, to provide a service for the sale of goods, or an obligation specified by us.

We treat your personal information within the limits of generally binding legal regulations and we ensure that it is not tampered with or misused. Personal data protection, privacy protection and the rights of each individual is one of the core values that Kofola’s employees follow.

Our employees are fully aware of the value and sensitivity of the personal data they come into contact with and they work with. They are fully aware of the damages that the disclosure, destruction, or alteration of this information may cause to any one owner of this data, to each of you.

Kofola and each of its employees personally undertake to protect the confidentiality, accessibility, and integrity of the personal data they come into contact with and they work with because they consider it to be a matter of personal professional honour irrespective of whether they are bound by a legal act. Personal data that our employees come into contact with and they work with will never be disclosed, will not be passed on to anyone without authorization, they will never change or destroy them, beyond the scope of the job. In order for our employees to avoid unintentional disclosure, destruction or alteration of personal data they come into contact with and they work with, our employees regularly educate themselves and undergo training in this area.

Each employee makes maximum effort to prevent disclosure, destruction or alteration of personal data he or she comes into contact with and he/she works with. This means that he/she follows the security measures of information security, protects personal data in paper form, observes his/her surroundings and immediately reports any suspicious behaviour of computer technology, colleagues or third parties.

Kofola and its all employees make maximum effort to ensure a fair and transparent processing of personal data. For this purpose, we process processes that we continually improve so that each subject has an answer to any question about his/her personal data and their processing at all times.

Kofola and its all employees make maximum effort to ensure that the rights of data subjects are met and for this purpose both the appropriate technologies and the right processes are implemented.



Who to contact regarding your personal data and your rights

In case you have any questions regarding your personal data or the exercise of your rights, please do not hesitate to contact us. We are ready to provide you with full information service or help with fulfilling your rights.

In such cases, please contact:

gdpr@kofola.cz

What personal information on you we process

The personal data you provide and which we process serve to conclude and execute the contract, without this information it would unfortunately not be possible. These are:

- Name and surname
- Address
- Telephone number
- E-mail address
- audio
- Bank connection, bank account
- In the case of recruitment process your CV or photo.

On what legal basis we process your personal data

The above personal data you provide are processed based on the legal basis specified below:

- **Performance or conclusion of the contract**
 - Purchase and sale of goods and services, invoicing, mutual communication, request for donation
- **Compliance with legal obligations**
 - Obligations under Czech law or EU law - Act on Accounting, Labour Code, laws on social security and employment, the Insurance Act, the AML Act, etc.
- **A legitimate interest**
 - Property protection (camera system), transfer within Kofola for administrative purposes, direct marketing.

Who receives your personal data from us

We only share your personal information within Kofola. Your personal data may be further provided and made available to third parties to the extent necessary. This applies to the following groups of recipients:

- Our logistics suppliers (delivery of goods and services) - performance of the contract.



- Our partners providing registration, claim and feedback to improve our products and services provided to our customers - a legitimate interest (improvement of goods and services).
- Audit companies - performance of legal obligations.
- IT companies - based on legitimate interest. It is IT outsourcing and possible access to personal data within IT system management.
- State administration bodies - tax offices, health insurance companies, social insurance companies, courts, bailiffs and so on - on the basis of the performance of legal obligations.

Any entity/third party that obtains your personal information from us for the above purposes (unless it is the performance of legal obligation) is bound by a contract that provides, inter alia:

- The obligation to protect personal data
- Obligation of confidentiality
- Obligation to cooperate when checking compliance with GDPR provisions

Transfer of your personal data abroad

We only share your personal information within Kofola. Your personal data may be further provided and made available to third parties to the extent necessary. This applies to the following groups of recipients:

- Our partners providing registration, claim, and feedback to improve our products and services provided to our customers - a legitimate interest (improvement of goods and services).

Any entity/third party that obtains your personal information from us for the above purposes (unless it is the performance of legal obligation) is bound by a contract that provides, inter alia:

- The obligation to protect personal data
- Obligation of confidentiality
- Obligation to cooperate when checking compliance with GDPR provisions

How long we store your personal information

We store your personal information, depending on the purpose for which the personal data are processed. We keep your personal information for at least the duration of the contract. In most cases, we are required to store your personal data in accordance with the laws (Accounting Act, Labour Code, laws on social security and employment, Insurance Act, AML, etc.) that is usually for 10 years.

If you are interested in specific terms of retention of your personal data, please do not hesitate to contact us



gdpr@kofola.cz

Processing of cookies, IP address monitoring and other means of technological monitoring

We do not use means to monitor, analyse, and evaluate cookies, IP addresses, and other electronic tags.

Profiling based on personal data

Kofola does not perform profiling based on the personal data provided.

Your rights

Kofola is committed to the principles established by European Parliament and Council Regulation 2016/679 on the protection of individuals with regard to the processing of personal data and the free movement of such data (GDPR) and is ready to fully cooperate in exercising your rights.

According to the GDPR, your rights are:

- The right of the data subject to be forgotten, to be erased (Article 17 of the GDPR)
- The right of the data subject to get acquainted with the data that the controller or processor has on the subject (Article 15 of the GDPR)
- The right of the data subject to object to the processing of his or her personal data (Article 21 of the GDPR)
- The right of the data subject to limit processing (Article 18 of the GDPR)
- The right of the data subject to be able to transfer his or her personal data from the controller to a third party (Article 20 of the GDPR)
- The right of the data subject to request a human review in the case of automated decision making (Article 22 of the GDPR)
- The right of the data subject to update his/her personal data so that his/her outdated version does not cause him/her harm (Article 16 of the GDPR)

Erasure (right to be forgotten) - your personal data will be erased, except for the data necessary for the fulfilment of a legal obligation, data necessary for the defence of legal claims or data necessary for the protection of public interests.

Access (seeing the information we have about you) - You will be provided with a copy of all personal information we keep about you except for our intellectual property or our business secret, as well as cases where personal information of others may be transferred.

You can object to the processing of your personal data - you can raise an objection at any time, which will be dealt with in a corresponding way that does not harm your interests. The objection may be invoked in cases where processing is necessary for the purposes of the legitimate interests of the relevant controller or third party, or to the processing of



personal data for direct marketing or profiling purposes. If you object to processing for direct marketing purposes, your personal data will no longer be processed for this purpose.

Restrictions on the processing of personal data - based on your objection, the processing of your personal data will be limited. The processing of personal data is limited until the resolution of the objection.

Transfer of personal data - if you provided us with your personal data on the basis of a contract or consent, your personal data will be exported to you in a structured, commonly used electronic format so that you can transfer it to a third party.

To request human review for automated decision making - if you are in doubt about the accuracy of automated decision making on the basis of your personal data provided, we will ensure the implementation of the decision by an authorized role.

To update your personal data so that their outdated version does not cause you harm - we will update your personal data on the basis of your initiative.

In accordance with Article 21 (4) of the GDPR, Kofola notifies you in particular that you have the right to object to automated individual decision making under Article 21 of the GDPR, and that under Sec. 21 (2) of the GDPR you have the right at any time to object to the processing of personal data for direct marketing purposes (see above). At the same time, Kofola informs you that if you suspect that your personal data is being processed unlawfully, you have the right to file a complaint with the Office for Personal Data Protection of the Czech Republic.

Personal data protection

Kofola ensures the protection of your personal data by a security management system based on risk analysis of personal data. Kofola assures you that it continuously assesses the security situation and risks and modifies its security plans so that your personal data are not endangered. We want to assure you that appropriate procedures and technologies are implemented to ensure information, physical and administrative security, both through organizational and technical means. For understandable reasons, we do not mention these procedures and mechanisms at this point.

Finally, we would like to assure you that your personal data are safe and we approach them in the way we would like others to approach our personal data.