# **Privacy Policy**

CZG – Česká zbrojovka Group SE





CZG – Česká zbrojovka Group SE, having its registered office at Opletalova 1284/37, Nové Město, 110 00 Prague 1, Czech Republic, identification number: 29151961, registered in the Commercial Register maintained by the Municipal Court in Prague, file no. H 962 (hereinafter referred to as "CZG" or the "Controller") processes personal data of data subjects in the course of its business activities which means that CZG determines the purpose and means of the processing of personal data, processes such personal data and is liable for such processing.

### 1. PRIMARY OBJECTIVES OF DATA PROTECTION

The processing of personal data in CZG is guided by the following primary objectives of data protection:

- to protect individuals in connection with the processing of their personal data;
- to protect the rights of individuals in connection with the processing of their personal data;
- to ensure permanent compliance with the requirements of the General Data Protection Regulation;
- to comply with other legal and technical requirements laid down in related legislation and standards;
- to ensure the ability to prevent and handle adverse events;
- to promote accountability of employees in personal data protection;
- to ensure continuous improvement of the suitability, adequacy and effectiveness of the data protection management system.

#### 2. PURPOSES OF PERSONAL DATA PROCESSING

Personal data are processed only to the extent necessary for the relevant purpose and for the time necessary to meet the relevant purpose. The purposes of personal data processing by CZG include but are not limited to:

- to conclude and perform contracts;
- to comply with statutory obligations;
- to pursue its legitimate interests;
- as defined in the consent to the processing of personal data.

### 3. SCOPE OF PERSONAL DATA PROCESSING

Personal data are processed to the extent to which they were provided by the relevant CZG data subject in connection with the conclusion of a contractual or any other legal relationship with CZG and/or to which they were otherwise collected and processed by CZG in compliance with applicable laws and regulations, and/or to comply with statutory obligations.

# 4. SOURCES OF PERSONAL DATA

CZG obtains personal data directly from the data subjects, from publicly available resources and/or its own activities. Where the personal data are obtained from data subjects, the data subjects are always informed about the purpose of and legal basis for the processing of their personal data, about the data processed, the recipient of the personal data and the duration of their processing.

# 5. CATEGORIES OF PERSONAL DATA PROCESSED BY CZG

- Address and identification details used to clearly and unambiguously identify the data subject, such as first name, last name, title, personal identification number, date of birth, permanent address, ID number (IČO), tax number (DIČ);
- Details permitting contact with the data subject contact address, phone number, fax number, e-mail address and other similar information;
- Descriptive details bank details;
- Employee details;
- Other details necessary for the performance of a contract or processed due to a statutory obligation.

#### 6. CATEGORIES OF DATA SUBJECTS

- Third parties cooperating with the Controller;
- Employees and persons holding posts in the Controller's bodies, job candidates;
- Service providers;
- Shareholders;
- Other persons in a contractual relationship with the Controller.

### 7. PERIOD OF PROCESSING

In accordance with the periods set out in the relevant contracts, privacy notices, consents to processing and/or the applicable laws and regulations, this is the period of time necessary to exercise the rights and meet the obligations under a contract or applicable laws and regulations.

# 8. METHOD OF PERSONAL DATA PROCESSING

CZG proceeds so as to ensure that the personal data are secure and cannot be misused and to prevent any harm to the data subject's rights, and prevents any unauthorised interference with the data subject's private and personal life.

For this purpose, CZG has adopted technical and organisation measures to safeguard personal data, including but not limited to measures preventing any unauthorised or accidental access to personal data or their modification, destruction or loss, unauthorised transmission, unauthorised processing and any other misuse of personal data.

CZG represents that it considers the personal data processed to be confidential and will use them only for the intended purpose. Personal data are processed primarily by the relevant employees who need to have access to the personal data in order to fulfil their work duties. Such employees must have agreed to keep confidential all facts and data, of which they learn when fulfilling their work duties. In addition, access to personal data is also granted to employees of processors on a need-to-know basis for the purposes of the activities they perform for CZG. CZG enters into written personal data processing agreements containing personal data security guarantees with all processors.

# 9. RIGHTS OF DATA SUBJECTS

CZG will provide information about the ability to exercise the following rights at any time during the processing of personal data:

- a) to request access to personal data from the Controller;
- b) to object to the processing of personal data;
- c) to request rectification of inaccurate personal data (if the data subject believes that the personal data processed are inaccurate);
- d) to request deletion of personal data or, where appropriate, to request limitation on their processing;
- e) to withdraw consent at any time by written notification to the Controller if consent has been granted;
- f) to lodge a complaint with the Office for Personal Data Protection.

CZG will always duly assess all requests and handle them in compliance with the relevant provisions of the General Data Protection Regulation (GDPR).

