

## TERMS OF PERSONAL DATA PROCESSING

**Accolade Group companies**, the full list of which can be found [HERE](#) (“**Accolade companies**”) hereby provide information on the method and extent of personal data processing, including rights relating to personal data processing.

Accolade companies, as personal data controllers or processors, collect, store and use (and otherwise process) personal data in connection with their business activities (the individual purposes for which personal data are processed are specified below).

The protection of privacy and personal data processing is a priority for Accolade. The processing of personal data is considered to be strictly confidential and personal data are handled in accordance with the applicable data protection legislation, in particular the EU General Data Protection Regulation 2016/679 (“**GDPR**”).

### 1. LEGAL BASIS AND PURPOSES OF PERSONAL DATA PROCESSING

The legal basis for personal data processing by Accolade companies is the negotiation of the conclusion and performance of a contract, the performance of obligations imposed on Accolade companies by legislation and Accolade companies’ legitimate interest.

Accolade companies are authorised to process personal data primarily for the following purposes:

**Performance of a contractual relationship** - negotiations on the conclusion, amendment or performance of a contract. Performance of a contractual relationship is mainly the provision of services to the customer, or tenant, associated with the lease of premises and other services provided by Accolade companies, the contractual relationship with a supplier that supplies Accolade with goods or services or any other contractual relationship with a third party (the “**partner**”),

**Compliance with legal obligations** - obligations under accounting and tax legislation. Compliance with legal obligations also means providing data and information to law enforcement agencies or other public authorities, in accordance with applicable law. In the case of a person’s birth ID number, this is an obligation arising from the Cadastral Register Act, also the Investment Companies and Investment Funds Act;

**Controller’s legitimate interest** - protection of the controller’s rights and interests and interest in developing business relationships with the partner;

**Sending commercial messages** - offering the services of Accolade companies or third parties.

### 2. PROCESSED PERSONAL DATA

Accolade companies are authorised to process the following personal data according to the processing purpose:

Data subjects’ data	Processing purposes:
<b>Name, surname</b>	Performance of the contractual relationship, Compliance with legal obligations, Controller’s legitimate interest, Sending commercial messages.
<b>Date of birth</b>	Performance of the contractual relationship, Compliance with legal obligations, Controller’s legitimate interest.
<b>Birth ID Number</b>	Compliance with legal obligations.
<b>Address</b>	Performance of the contractual relationship, Compliance with legal obligations, Controller’s legitimate interest, Sending commercial messages.
<b>E-mail</b>	Performance of the contractual relationship, Compliance with legal obligations, Controller’s legitimate interest, Sending commercial messages.
<b>Phone number</b>	Performance of the contractual relationship, Compliance with legal obligations, Controller’s legitimate interest, Sending commercial messages.
<b>Account number</b>	Performance of the contractual relationship, Compliance with legal obligations.
<b>Reg. no., Tax reg. no.</b>	Performance of the contractual relationship, Compliance with legal obligations, Controller’s legitimate interest.
<b>Contract details (contract number, date, file reference, etc.)</b>	Performance of the contractual relationship, Compliance with legal obligations, Controller’s legitimate interest.
<b>Information on partner’s creditworthiness, payment record and trustworthiness</b>	Performance of the contractual relationship, Compliance with legal obligations, Controller’s legitimate interest.

### 3. RECIPIENTS OF PERSONAL DATA

Personal data are only accessible to authorised employees of Accolade companies or to individual personal data processors and controllers of Accolade companies, only to the extent strictly necessary for the individual processing purposes or based on consent to the processing of personal data.

**Personal data may be transmitted to:**

- a) external accounting firms,
- b) external law firms;
- c) processors who provide Accolade companies with server, website, cloud or IT services or who are our business partners.

In cases provided for by law, Accolade companies are authorised, or rather required, to transmit certain personal data under applicable law, for example to law enforcement agencies or other public authorities.

### 4. PERSONAL DATA STORAGE PERIOD

Accolade companies process personal data for the period strictly necessary to ensure all rights and obligations under the applicable contractual relationship and also for the period for which Accolade companies are required, as personal data controllers, to store personal data according to generally binding legislation.

**Accolade companies process personal data depending on the purpose for the period:**

Purpose of processing	Storage period
<b>Performance of the contractual relationship</b>	For the duration of the contractual relationship and for 10 years from termination of the contractual relationship.
<b>Compliance with legal obligations</b>	For the period stipulated by the relevant legal regulation.
<b>Controller's legitimate interest</b>	For a maximum of 3 years from the time the data are stored, unless special legislation stipulates a longer period in certain cases or unless in a justified case there is a need to store data for a longer period in connection with a specific case.
<b>Sending commercial messages</b>	For the duration of the consent given to the sending of commercial messages or until consent to processing is withdrawn.

### 5. THIRD PARTIES' PERSONAL DATA

Third parties' personal data, which means the personal data of employees and other natural persons involved in cooperation with the partner, or other data that Accolade companies receive from the partner in connection with the conclusion or performance of the Contract will be processed in accordance with applicable data protection legislation. These personal data will be used by Accolade companies to perform contracts with the partner. The partner hereby acknowledges that Accolade companies will process third parties' personal data for the duration of the contractual relationship and further for the period stipulated by special legal regulations, or for a longer period if in a justified case it is necessary to store data in connection with a specific case.

**The partner shall properly instruct its employees and other natural persons** participating on its side in cooperation with Accolade **about the processing of personal data by Accolade companies.**

### 6. DATA SUBJECTS' RIGHTS

As a data subject, the partner has rights under law which it can exercise at any time regarding the processing of personal data. This is the right to (i) access to personal data, (ii) the rectification of inaccurate personal data and the completion of incomplete personal data, (iii) the erasure of personal data if they are no longer needed for the purposes for which they have been collected or otherwise processed, or if it is found that they have been processed unlawfully, (iv) the restriction of the processing of personal data, (v) data portability, (vi) the right to object after which the processing of personal data will be terminated, unless it is proven that there are serious legitimate grounds for processing that override the interests or rights and freedoms of the data subject, in particular, where the reason is for enforcing legal claims; and (vii) the right to contact the Office for Personal Data Protection ([www.uoou.cz](http://www.uoou.cz)).

**The right of access to personal data:** If you want to know whether any of the Accolade companies processes personal data, you have the right to obtain information about whether your personal data are processed, and if they are, you also have the right of access to your personal data.

**The right to the rectification of inaccurate data and the completion of incomplete personal data:** If you think that Accolade is processing inaccurate or incomplete personal data about you, you have the right to request that they be rectified and completed without undue delay, but always considering the technical possibilities.

**The right to erasure:** In the event that you request erasure, Accolade will erase your personal data if (i) they are no longer required for the purposes for which they were collected or otherwise processed, (ii) the processing is unlawful, (iii) you object to the processing and there are no overriding legitimate grounds for the processing of your personal data, or (iv) Accolade has a legal obligation to process the data.

**The right to restriction of the processing of personal data:** If you request restriction of processing, Accolade will not disclose the personal data, will temporarily remove or retain the personal data or perform other processing operations that will be necessary to properly exercise the right that has been claimed.

**The right to data portability:** If you want Accolade to transmit personal data to a third party, you can use your right to data portability. If the exercise of this right adversely affects the rights and freedoms of other persons, Accolade will not be able to comply with your request.

**The right to object:** The right to object to the processing of personal data that are processed for the purpose of performing a task carried out in the public interest or in the exercise of public authority or for the purpose of protecting Accolade's legitimate interests. If Accolade does not prove that there is a serious legitimate reason for processing that overrides the interest or the rights and freedoms of the partner, processing shall be terminated based on the objection without undue delay.

In the event of unreasonable, inappropriate or repeated requests to exercise the above rights, Accolade companies will be entitled to charge a reasonable fee for exercising a particular right or refuse to carry it out. Accolade companies will inform you about this.

Further information regarding the processing of personal data will be provided to you on behalf of all Accolade companies, as the personal data controller, by Accolade, s.r.o. (Sokolovská 394/17, Karlín, 186 00 Prague 8, reg. no.: 27851371) at the e-mail address [info@accolade.cz](mailto:info@accolade.cz). To exercise rights, the partner can make a request in writing to the registered address of Accolade, s.r.o. or by e-mail to [info@accolade.cz](mailto:info@accolade.cz). Accolade companies reserve the right to verify in an appropriate manner the identity of the data subject exercising the above rights.