

## PRIVACY POLICY

We are a company **NETWORG CZ s.r.o.**, ID: 03412687, with its registered office at Sokolovská 352/215, Vysočany, 190 00 Prague 9, Czech Republic, registered in the Commercial Register kept by the Municipal Court in Prague under file No. C 231313 and as a controller of personal data we want to inform you about the processing of personal data, that may occur:

- When you use our website;
- When we provide you with our services (especially TALXIS software);
- When we fulfill our legal obligations;
- When we communicate (by phone, e-mail, etc.);
- For the purposes of protecting our legitimate interests and the legitimate interests of third parties.

We understand that it can be difficult to become familiar with individual concepts related to personal data protection, so we recommend you to look at the [basic guide](#) issued by the Office for Personal Data Protection.

### 1. WHAT YOUR PERSONAL INFORMATION WILL WE PROCESS?

We process the following information:

- **Personal information you provide to us when you use our services.** In case you are interested in our services, or you are already our client (or represent our client), we may process your personal data in the range of identification (eg. Name, surname, ID Number, date of birth, social security number), contact information (eg contact address, registered office, e-mail address, telephone number) and payment details, including data necessary for registration and other data necessary for the performance of the contract, the fulfillment of legal obligations or the protection of legitimate interests.
- **Information needed to check if there is no breach of contract.** These are the user names of the application users, the user identifier and the customer's tenant, the domain and information about the user's browser, or other data about the use of the application.
- **Information you provide to us in connection with your request** (eg if you wish us to contact you or you are interested in receiving a newsletter).
- **Information about your activity on our website.**

These are small text files, called cookies, that websites store on your computer or mobile device. The site thus remembers information about your visit for a certain period of time (eg

preferred language, login details and other display preferences or settings). The next visit to the site is therefore easier and more productive.

We can use two types of cookies:

- i. Session cookies – these are temporary cookies that are necessary for the proper functioning of the website.
- ii. Permanent cookies – these are stored for a longer period of time. It serves for easier and more convenient orientation on our website

We use cookies for technical purposes, to store your settings, for statistical records, to measure website traffic, for the proper functioning of the website, to detect unauthorized visitors on our website and to ensure sufficient security of our website. We do not combine the data obtained from cookies with any other data, they do not serve to obtain any sensitive personal data or to identify you as specific persons.

We will store cookies only for the time necessary for the proper operation of the website, but no longer than for two (2) years.

Therefore, in order to better tailor the website to you, we use some functionality provided by third parties to measure anonymous user behavior data. These tools are used exclusively to improve existing services and for marketing purposes, but do not allow the identification of a specific user, resp. collection of his personal data. However, we will always ask for your consent to use these third-party services.

**These are the following types of cookies:**

- T.lead.com: c;
- Google Analytics: \_gid, \_gat, collect, \_ga;
- LinkedIn: lidc, lissc, bcookie, bscookie;
- Instafeed.codev.wixapps.net: AWSALBCORS, bSession;
- Behavee: \_ga, \_gid, \_pk\_uid, sales\_pop\_unique\_visitor, sales\_pop\_view\_count, svSession;
- Facebook: \_fbp, tr, fr.
- Clarity: \_clck, \_clsk, CLID, ANONCHK, MR, MUID, SM;
- Azure Application Insights: ai\_session, ai\_user.

**Cookies can be set or completely rejected in the settings of the internet browser you use. However, some website functions may not work properly without cookies.**

- **We may also process information about third parties**, which are in particular the personal data of our clients' (your) employees or contractual partners, and other data that we receive

from clients or contractual partners. We use this personal data exclusively for the purpose of fulfilling contracts with our clients or contractual partners.

## 2. HOW WE USE THE INFORMATION OBTAINED AND ON WHAT LEGAL BASIS

- **We use the data you provide (communicate) to us in order to be able to provide you our services**, to resolve possible complaints, for accounting and for other purposes arising from our mutual contractual and pre-contractual relationship. The legal basis for this processing is the fulfillment of contractual obligations pursuant to Article 6, paragraph 1, letter (b) the GDPR and the fulfillment of legal obligations under Article 6 (1) c) GDPR.
- **We will use the information needed to check whether there is a breach of contract** just to check mutual contractual obligations. Under the agreement, you or the person who licensed you may use our application, and the person who entered into the agreement with us has received a certain number of licenses. For this reason, we will control the number of uses of these licenses. If you are our customer, the processing will be carried out in accordance with the fulfillment of contractual obligations pursuant to Article 6, paragraph 1, letter b) GDPR. If you have not concluded a contract with us, the processing is based on our legitimate interest pursuant to Article 6 (1) (f) GDPR, which consists in protecting our own interests. At the same time, we may use some information to fulfill our obligations and provide the application in accordance with the contract and our legitimate interest.
- **We may also use the information to process your requests**, which we have received, for example, by telephone, e-mail or otherwise. The legal basis for processing here is your request.
- **Protection of legitimate interest**, we may process personal data in order to protect our legitimate interests (eg to provide and improve customer support and care) or the legitimate interests of third parties.
- **We also process information in order to comply with our legal obligations under applicable regulations**, such as accounting and tax regulations, which require such processing.
- **We may use the information to send commercial communications and newsletters**, but only with the consent with data processing for the purposes of providing direct marketing pursuant to Article 6 (1) (a) GDPR in connection with § 7 of Act No. 480/2004 Coll., on certain information society services (consent can be revoked at any time) or if you are our client (based on our legitimate interest).

We use your data in our **internal documentation, in which we keep records of where your personal data is stored, ways of securing it, whether your data has been deleted, who deleted it within our company and when**, so that we can prove our compliance with legal regulations in the field of personal

data protection and at the same time be able to fulfill other obligations arising from other legal regulations.

We process personal data both manually and automatically.

### **3. WHO HAS ACCESS TO YOUR PERSONAL DATA**

Please note that our application also uses some third-party services (especially Microsoft), if you use these functionalities, it may happen that some data will be shared with this third party so that the functionality can be made available to you. Among other things, we use Microsoft Azure services. The Microsoft Terms are available here: <https://azure.microsoft.com/en-us/support/legal/>.

Your personal data may also be disclosed to public authorities based on your instructions, where required by law, or to protect our legitimate interests or the legitimate interests of third parties.

To the extent necessary, your personal data may also be disclosed to our contractual partners and information system service providers, in particular our tax, accounting or law firm, company Digital factory s.r.o. providing SIGNI services (electronic document signing) and company Atlassian when using JIRA software tool (helpdesk).

The data we collect from you is stored and processed only within the European Union ("EU").

### **4. FOR HOW LONG WE WILL PROCESS YOUR PERSONAL INFORMATION**

We will process your personal data only for the time strictly necessary to fulfill the above purposes for which they were collected, ie (a) information about the contractual relationship for the duration of this contractual relationship and for a period of 10 years after its termination, (b) until completing your request and for another 2 years following its completion, (c) as long as required by law, (d) for the duration of your consent to the processing of personal data, if you have given us any, or until you refuse to receive commercial communications and service offers, (e) for the duration of the contractual relationship and thereafter for 2 years, in relation to the information needed to check if there is no breach of contract; and (f) for a period of 3 years from the start of the processing of personal data in relation to other data, unless law require otherwise or if, in justified cases, there is need to store personal data for a longer period (eg in order to protect a legitimate interest).

### **5. WHAT ARE YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA PROTECTION**

You have the following rights in relation to the processing of your personal data carried out by us:

- the right of **access** to personal data;
- the right to **rectification**;
- the right to **erasure** ("right to be forgotten");
- the right to **restrict** data processing;

- the right to **object** to the processing;
- the right to data **portability**;
- the right to **complain** about the processing of personal data.

Your rights are explained below so that you can get a clearer idea of their content.

**The right of access** means that you can request our confirmation at any time whether or not personal data concerning you are processed and, if so, for what purposes, to what extent, to whom they are disclosed, for how long we will process them, whether you have the right to rectification, erasure, restrict the processing or raise an objection from where we obtained personal data and whether there is an automated decision-making process based on the processing of your personal data, including possible profiling. You also have the right to obtain a copy of your personal data, the first provision is free of charge, for the next provision we can demand a reasonable payment of administrative costs, in the amount of 100 CZK.

**The right to rectification** means that you can ask us at any time to correct or complete your personal data if it is inaccurate or incomplete.

**The right to delete** means that we must delete your personal data if (i) they are no longer needed for the purposes for which they were collected or otherwise processed, (ii) the processing is illegal, (iii) you object to the processing and there are no overriding legitimate reasons for processing, (iv) we have such legal obligation, or (v) you revoke such consent in relation to personal data for which you have given your consent.

**The right to restrict processing** means that until we resolve any disputes regarding the processing of your personal data, we may not process your personal data other than by storing them and, if necessary, using them only with your consent or for the purpose of determining, enforcing or defending legal claims.

**The right to object** means that you can object processing of your personal data that we process for reasons of legitimate interest, including profiling based on our legitimate interest. If you object to processing for direct marketing purposes, your personal data will no longer be processed for these purposes. In the event of an objection to processing based on other reasons, this objection will be evaluated and we will then inform you whether we have complied with it and will no longer process your data or that the objection was not justified and processing will continue. In any case, processing will be limited until the objection is resolved.

**The right to portability** means that you have the right to obtain personal data that concern you and that you have provided to us by consent or contract, which are also processed automatically, in a structured, commonly used and machine-readable format, and the right to transfer this personal data directly to another controller.

If you have any **comments** or **complaints** regarding the protection of personal data or a **question** about the person responsible for data protection in our company or **you exercise any of your rights, please contact our responsible person at [gdpr@networg.com](mailto:gdpr@networg.com)** . We will answer your questions or comments within one month.

Our activities are also supervised by the **Office for Personal Data Protection, where you can file a complaint in case of your dissatisfaction. You can find out more on the Office's website ( [www.uoou.cz](http://www.uoou.cz)).**

#### **CHANGES OF THIS POLICY**

Our Policy may change from time to time. We will post any changes to our Privacy Policy at [www.talxis.com](http://www.talxis.com) and [www.networg.com](http://www.networg.com) and will notify you with more details if there are any significant changes (for some services, we may notify you of Policy changes by email). We archive previous versions of this Policy for you to access it in the future.

**This Policy is effective January 1, 2021.**