



GDPR

DATA PROTECTION

(within the meaning of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter referred to as the "**Regulation**") in conjunction with Act No. 110/2019 Coll. on the processing of personal data, as amended)

(Administrator's Directive)

I. Administrator and Subject of the Directive Administrator

1. The controller of personal data pursuant to Article 4 point 7 of the Regulation is **Verdi Capital s.r.o.** (www.fondfarem.cz, contact e-mail: info@fondfarem.cz) ID 24814326 with registered office at **Na Poříčí 1079/3a, Praha, 110 00** (hereinafter also referred to as: "Administrator" or "Administrator").
2. General personal data are name, sex, age and date of birth, personal status, but also IP address and photographic record or one or more specific elements of the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person. Particular categories of personal data are data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sexual orientation and criminal offences or convictions. Genetic data are personal data relating to the inherited or acquired genetic characteristics of a natural person resulting from the analysis of a biological sample of the natural person concerned or from the analysis of another element which makes it possible to obtain equivalent information. Biometric data are personal data resulting from specific technical processing relating to physical or physiological or behavioural characteristics of a natural person which allow unique identification. Typical biometric data are, for example, a facial image, a fingerprint, but also, according to recent case law, a signature.
3. "Personal data" within the meaning of Article 4(1) of the Regulation means any information about an identified or identifiable natural person; an identifiable natural person is a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, a network identifier or to one or more specific elements of the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

II. Administrator's Declaration of DPOs (Protection Officers)

1. the Controller has appointed a DPO (Data Protection Officer), i.e. a Data Protection Officer, from among its employees/if appointed, Václav Štekr, based at "the Controller"

III. Personal data processed by the Controller

1. The Controller processes personal data voluntarily provided by you or personal data obtained by the Controller on the basis of the fulfilment of an order placed by you with the Controller.
2. The Controller processes your identification and contact data and the data necessary for the performance of the contract, i.e. data fulfilling Article 1(2) of this Controller Directive.
3. "Processing" of personal data within the meaning of Article 4(2) of the Regulation means any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated processes such as collection, recording, organisation, structuring, storage,



adaptation or alteration, retrieval, inspection, use, disclosure by transmission, distribution or any other disclosure, alignment or combination, restriction, erasure or destruction.

IV. Data archiving period

1. The controller shall retain personal data in a lawful and fair manner and for the period of time set out below:
 - for as long as necessary to exercise the rights and obligations arising from the contractual relationship between you and the controller and to assert claims under these contractual relationships for a period of 5 years from the termination of the contractual relationship.
 - for a period of time before consent to the processing of personal data for marketing purposes is withdrawn, but no longer than 5 years if the personal data is processed on the basis of consent.
2. After the expiry of the period referred to in paragraph 1 of this Article, the Controller shall destroy the data about you both on electronic media and documents or other documents containing your data in physical form.

V. Legal grounds and purpose for processing personal data

1. The legal (statutory) basis for the processing of personal data by the Controller is
 - the performance of the contract concluded between the Controller and you under the legal basis of Article 6(1)(b) of the Regulation,
 - the legitimate interest of the Controller in providing direct marketing (in particular for sending commercial communications and newsletters) according to the legal basis under Article 6(1)(f) of the Regulation,
 - Your voluntary consent to processing for the purpose of providing direct marketing (in particular for sending commercial communications and newsletters) according to the legal basis under Article 6(1)(a) of the Regulation in conjunction with Section 7(2) of Act No. 480/2004 Coll., on certain information society services, unless an order for goods or services has been placed.
2. The purpose of the processing of personal data by the Controller is
 - processing and subsequent implementation of a specific order requested and placed by you and the exercise of rights and obligations arising from the contractual relationship between you and the Administrator; when placing an order, personal data are required that are necessary for the successful execution of the order, the provision of personal data is a necessary requirement for the conclusion and performance of the contract, without the provision of personal data, it is not possible to conclude the contract or its performance by the Administrator.

VI. Recipients of personal data (subcontractors of the controller)

1. Recipients of personal data are persons
 - involved in the delivery of goods/services/making payments under the contract,
2. The controller does not intend to transfer personal data to a third country (non-EU country) or an international organisation.

VII. Small text files (COOKIES)



1. The Administrator uses "cookies" on the websites operated by the Administrator. These Cookies are used for the maximum convenience of customers when using the Administrator's website, they are created in



the device you are using to view the Manager Site at the time you activate the Manager Site on your device.

2. Cookies are mainly used for:
 - Improve the performance of the Manager site by collecting information about how you use it (e.g. which tabs are most visited).
 - increase the functionality of the Manager's pages and bring them closer to you by allowing you to remember your previous choices. However, this information is not used to identify you or to remember where you have "surfed" the Internet.
 - allow certain tools to work, provide anti-spam measures and access to age-restricted content; and
 - allow certain suppliers and their subcontractors, if any, to provide services that are linked to the Administrator's site and, where applicable, provide these services on behalf of the Administrator.
3. "Cookies" allow, and only in general terms, to record statistical data about visitor behaviour on the Administrator's website, primarily to offer you relevant content.
4. "Cookies" are used by the Administrator for the purpose of your authentication, i.e. to eliminate the need to enter personal identification data about you when you use the Administrator's website again.
5. By using the Administrator's website, you consent to the use of cookies in the manner set out above.

VIII. Protected data subject's rights

1. Under the conditions set out in the Regulation, you have the following rights (a demonstrative list)
 - the right of access to your personal data under Article 15 of the Regulation,
 - the right to rectification of personal data pursuant to Article 16 of the Regulation or restriction of processing pursuant to Article 18 of the Regulation.
 - the right to erasure of personal data pursuant to Article 17 of the Regulation.
 - the right to object to processing under Article 21 of the Regulation; and
 - the right to data portability under Article 20 of the Regulation.
 - the right to withdraw consent to processing in writing or electronically to the address or via the Controller's website or to the Controller's e-mail, all as set out in Article I. paragraph 1 of this Controller's Directive.
2. Other rights are listed in the full published text of the Regulation on the Controller's website, of which we demonstrate the possibility of filing a complaint with the Office for Personal Data Protection in the event of a violation of your right to personal data protection.

IX. Security of data storage, Declaration of the Controller

- The Controller declares that it will observe appropriate technical and organisational measures during the processing of personal data so that the processing complies with the requirements of the Regulation, the terms of the Agreement and to ensure the protection of the rights of the data subjects concerned. The Controller declares that it has ensured that these requirements, conditions and protection are observed by all persons authorised to process personal data who work for it.
- The controller declares that he/she has taken all the technical and organisational measures required under Article 32 of the Regulation to ensure a level of security adequate to the risk of the processing.
- The controller to comply with all its obligations and respond to requests to exercise the rights of data subjects set out in Chapter III. Regulation.



- The controller is fully prepared to demonstrate compliance with the obligations set out in Article 24 of the Regulation, i.e. taking into account the nature, scope, context and purposes of the processing, as well as the different likely and different risks to the rights and freedoms of natural persons, the controller has put in place appropriate technical and organisational measures to ensure and is able to demonstrate that the processing is carried out in accordance with the Regulation. The measures are reviewed and updated as necessary by the Controller.
- The controller is fully prepared to comply with its obligation to notify natural persons and authorised public authorities of any leakage of personal data, including the communication of what corrective measures have been taken to protect the data.
- The controller is obliged to ensure that only those personal data are processed which, in their scope and content, correspond to the purpose of their processing and are necessary for its achievement.
- The Controller shall keep records of all categories of processing activities that it carries out in accordance with the legal grounds set out in Article V of this Controller Directive.
- The Controller shall keep the personal data collected and processed under the Agreement separately and ensure that it is processed in a manner that is consistent with the purpose or legal reason for which it was collected.
- Unless otherwise specified in the Contract, the Controller is not entitled to disclose personal data obtained and processed under the Contract to third parties or to make them public.
- The controller shall use appropriate technical equipment and software in a manner that adequately prevents unauthorised or accidental access to personal data by unauthorised persons.
- The controller stores personal data in appropriately secured premises and rooms.
- Personal data in electronic form will be stored by the Controller on secure servers or data carriers to which only authorised persons will have access and, where possible, access will be restricted on the basis of access codes or passwords and personal data will be backed up regularly.
- The controller has put in place appropriate measures to ensure, as far as possible, the continued confidentiality, integrity, availability and resilience of the processing systems and services, ensuring, through appropriate technical means, the ability to restore the availability of and access to personal data in a timely manner in the event of physical or technical security incidents.

X. Final provisions

1. By submitting an order to the Administrator, you declare, of your full, serious, free will and not under duress, that you have fully read this Administrator Directive and accept it without further delay and in its entirety as stated above.
2. The Administrator reserves the right to change the Administrator's directive. In the event that the Manager's Guidelines are amended, the Manager will post the new version of the Manager's Guidelines on the Manager's website and will also send a new version of the Manager's Guidelines to all Clients in electronic form to the email address you have provided to the Manager.
3. The Regulation in its entirety is published on the Administrator's website. If it has not already done so, the Administrator is responsible for publishing this Regulation within 30 days of receipt of this document.

**Effectiveness of the Manager's Directive as at 13
March 2020**