

Information on the processing of personal data

ANeT-Advanced Network Technology, s.r.o., company number: **47916923** with its registered office at **Královopolská 3052/139**, 612 00 Brno (hereinafter referred to as ANeT), hereby declares that within the meaning of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data and on the revocation of the Directive 95/46 / EC (hereinafter referred to as "the Regulation") processes personal data of data subjects for its activities, and is therefore a personal data administrator (hereinafter referred to as the PD), i.e. the person who determines the ways and purposes of processing personal data, and, within the scope of its operation, it also processes, in the role of processor, personal data for other controllers, its customers.

As a PD administrator, the company processes mainly personal data of its employees and of the self-employed partners; as a PD processor, in the framework of support of the implemented ANeT identification systems, the company has occasionally and temporarily access to personal data of employees of its customers as users of ANeT systems.

Processing of personal data in the role of administrator

The company ANeT-Advanced Network Technology, s.r.o. in the role of PD administrator processes personal data in the following areas:

- Personnel agendas
- Work agendas
- Accounting agendas
- Payroll and monetary agendas
- Business and marketing agendas
- Tangible asset management agendas
- IT administration agendas

For personal data processing, the companies, as administrators, attest to the compliance with legal obligations, the performance of the contract, the legitimate interest of the administrator or a third party or the consent to the processing of personal data by the data subject. When processing personal data, the administrator shall comply with statutory terms and terms set after the careful consideration in the internal regulation so as not to violate the rights of data subjects. At ANeT, strict rules for the management of PD determine which employee and/or organizational unit may access which personal data and thus process the PD of data subjects. The company has within the framework of its operation sufficient effective organizational and technical measures in the context of Article 32 of the GDPR for sufficient protection of PD, these measures, or rather their effectiveness is regularly checked and improved when necessary.

ANeT does not transfer personal data of data subjects outside the company, however, within the processing of specific personal data, the company is in some cases obliged to transfer the PD to another person. ANeT seeks to minimize these transfers, but in some cases, the transfer

of PD is necessary to fulfil the obligations of the administrator under the law or contracts. In all cases where the administrator transfers personal data to another person, the company shall ensure maximum protection of the rights of the data subjects.

Person responsible for personal data protection

The administrator, based on a careful analysis of the extent and nature of processing and the types of personal data processed, notes that it is not obliged to appoint a data protection commissioner in the context of the Regulation. In order to properly ensure the rights and obligations defined by the Regulation, the administrator cooperates with their legal representative and has assigned the role of executive director within the company in the context of the relevant internal security directive as the position responsible for safeguarding personal data. At present it is Ing. Jiří Peterka. In case of any questions or wishes, it is possible to contact him by post at ANeT-Advanced Network Technology, s.r.o., Jiří Peterka, Královopolská 3052/139, Brno, by phone at 603 419 364 or by e-mail at jiri.peterka@anet.eu. This way, the company is ready to respond directly or indirectly to any messages or complaints with the highest priority in order to achieve the highest possible satisfaction on your part.

Processing of personal data in the role of processor

ANeT within the implementation of its own identification systems (typically e.g. attendance system ANeT-Time) and especially their subsequent contractual and non-contractual support gets the role of processor of personal data of subjects managed by the companies that are customers of the company. This means that the company has or may have temporary access to the personal data of the customer's employees that are established and used in the respective identification system as part of the implementation of its systems and/or the support request for the already implemented system. ANeT identification systems work over a secure SQL database and, of course, have built-in tools based not only on GDPR but on data security requirements in general through which an administrator can limit or even deny access to the employees' personal data (roles and associated access rights, personalized secure login, data encryption, access logging, anonymization tools, time notifications, deletion and irreversible deletion of the digital footprint of data subjects, etc.). However, although these tools and their setting or use are fully in the competence of the customer, i.e. the PD administrator they are also used for the purposes of successfully addressing a specific support request. So, it is not possible to use an "extreme" setting of completely disabling access to the PD of employees, and it is possible that ANeT workers may have access to the PD of customer's employees in the framework of the service request.

In order to ensure data security, the company has set up sufficient internal control mechanisms for data handling and security; ANeT employees are trained and legally obliged to maintain confidentiality and correct processing of PD; the company itself has concluded relevant processing contracts with most of its customers which, inter alia, deal with data security and data destruction at times set by internal regulations.

The company also offers a mobile application to the attendance system that is (or will be) freely available to customers' staff at Android and iOS marketplaces. This application of the mobile attendance client, respectively its use is inseparably linked to the system and functions, including the security of the customer's "full" attendance and allowing access to the

data only by allowing each particular mobile user to be managed by the administrator and by creating a secure mobile device tunnel. In the mobile application itself, no data is stored e.g. for offline use, the mobile client is used only for structured viewing and limited data editing in the system database.

Rights of the data subjects

In order to ensure that data subjects can decide as widely as possible on the processing of their personal data, the GDPR provides a number of rights that can be exercised against any data administrator or processor. If you decide to exercise any of your rights, please contact either the official ANeT address or the person directly responsible for the privacy in our company, which will speed up the entire process.

It is your fundamental right to request at any time information on whether ANeT processes your personal data. If we process it, you have the right to request one copy of all the personal data that we process about you. If you find that the processed data are inaccurate, you have the right to request the correction of personal data. If you believe that we do not process your personal data lawfully, you may exercise the right to delete the personal data. If you are not satisfied with anything or think that we did not process your request as we should, you have the right to appeal to The Office of Personal Data Protection.

We would like to emphasise that regardless of your relationship with ANeT, there is no risk in exercising these rights and ANeT will treat you as well as before you exercise your rights. It is in our interest to process personal data lawfully and properly and not to infringe on your rights. If you have any complaints and think that we are not doing well, we will be happy if you let us know.