

# Trask's Personal Data Processing

**TRASK SOLUTIONS a.s.**, Company ID: 62419641, with its registered office at Milevská 2095/5, Krč, 140 00 Prague 4 (hereinafter referred to as "Trask" or "we") pays due attention to the protection of your personal data. This document is to inform you about the processing of your personal data and your respective rights in the context of your visit of our websites [www.thetrask.com](http://www.thetrask.com) (hereinafter referred to as „websites“, or „web“) and possibly also with your personal presence in our offices. We process all personal data with the utmost emphasis on security and leverage appropriate technical, procedural and organizational means available to protect them, as we lay out in this document. Should you have any inquiries, please contact our personal data protection team at [GDPR@thetrask.com](mailto:GDPR@thetrask.com).

If you are applying for a job at Trask, you are also subject to the information on the processing of personal data of job applicants, the current version of which is always available on the website [www.pracevtrasku.cz](http://www.pracevtrasku.cz).

## Who does process your personal data?

We process your personal data as a controller of personal data, as we determine for what purpose and by what means your personal data will be processed.

We may need to transfer your personal data for internal administrative purposes to other companies within our group, namely:

- **TRASK HOLDING a.s.**, Id. No.: 29143829, seated at Milevská 2095/5, Krč, 140 00 Praha 4.
- **TRASK SOLUTIONS Slovakia s.r.o.**, Id. No.: 36766569, seated at Mlynské Nivy 16, 821 09 Bratislava – mestská časť Staré Město, Slovenská republika.
- **TRASK Deutschland GmbH**, seated at Hankensbüttel, Amtsgericht - Registergericht: Hildesheim HRB: 206352.
- **Trask Austria GmbH**, seated at Opernring 1 / R748, 1010 Wien, FB-Gericht: Handelsgericht Wien, FN: 524822y.
- **TRASK UK LTD**, seated at Bridge House Old Grantham Road, Whatton NOTTINGHAM, NG13 9FG United Kingdom, CN: 13689171.
- **TRASK MORAVIA s.r.o.**, Id. No.: 07349696, seated at Milevská 2095/5, Krč, 140 00 Praha.
- **TRASK PREMIUM a.s.**, Id. No.: 07723067, seated at Milevská 2095/5, Krč, 140 00 Praha.
- **Team8 s.r.o.**, Id. No.: 05533368, seated at Milevská 2095/5, Krč, 140 00 Praha.
- **Bell & Hurry s.r.o.**, Id. No.: 04757831, seated at Lazarská 11/6, Nové Město, 120 00 Praha.
- **SINETA s.r.o.**, Id. No.: 07994583, seated at Husova 217/39, Mladá Boleslav II, 293 01 Mladá Boleslav.
- **TRASK TELCO s.r.o.**, Id. No.: 14051664, seated at Milevská 2095/5, Krč, 140 00 Praha.
- **Meonzi s.r.o.**, Id. No.: 19211244, seated at Milevská 2095/5, Krč, 140 00 Praha.

However, only those companies that manage the activities at group level will have access to your data. The above companies will always process your personal data only to the extent and for the purposes described in this document.

We may transfer your personal data to third countries outside the European Economic Area (EEA) only if such country ensures an appropriate level of personal data protection or appropriate safeguards for the protection of personal data have been adopted, in particular where standard privacy clauses have been agreed with the recipient.

## Who else is involved in the processing of your personal data?

We may use the services of other processors from time to time to process your personal data based on existing contracts on the processing of personal data between us and them that ensure the processors' compliance with personal data protection regulations. Such processors include:

- IT product and service providers, such as the provider of the cookie bar on our website, company Usercentrics A/S, with its registered seat at Havnegade 39, 1058 København K, Denmark, or other providers of cookie-related services (see below).

## What personal data do we process?

The following section provides a detailed overview of the personal data we process, including examples.

**The data include:**

- **Identifiers**, in particular your name and surname.
- **Contact details**, in particular your phone number and e-mail address.
- **Photographs and video recordings** from corporate events, taken during parties, anniversaries in Trask, conferences and other events that we organize for clients or other persons who do not have a contractual relationship with us.
- **Records of mutual communication**, such as data filled by you into the contact forms.
- **Information about your device**, such as your device's IP address or browser version.
- **Information about your behavior on the website**, such as in particular information about how you move around the website or which parts of the website you visit.
- **CCTV footage** from the Controller's offices.

## How do we acquire personal data?

We obtain the personal data we process from you directly by filling in the contact form on our website, or indirectly by monitoring your behavior on our website, or by means of CCTV footage if you physically visit our premises.

## Why do we process personal data?

We process your personal data only to the necessary extent and only if one or more of the following conditions are met:

- you have granted us your consent;
- there is a legitimate interest on our part;
- data processing is necessary for the execution and performance of a contract with you.

We may continue processing your personal data even after a withdrawal of your consent if such processing is necessary because of our legitimate interest.

**We may process your personal data without your consent for the following purposes:**

### a) Communication and discussions with you

We process your identification data, contact data and records of our communications with you in order to communicate with you on the basis of the contact form you have filled in and to discuss the matters on which you have contacted us, all in order to take steps to conclude a contract with us. For this purpose, we process your personal data only for the duration of the mutual communication and thereafter for a maximum period of 6 months from the last mutual contact.

### b) Informing you about interesting events related to our products and services

We process your identification data and contact details so that we can invite you to events where we present other of our services and products that may be related to services and products you have already subscribed to from us. We carry out this processing on the basis of legitimate interest and we process your personal data for this purpose until you unsubscribe from such notifications. For example, you can unsubscribe in the way indicated in the invitation.

**c) Promotion of the company externally**

On the basis of our legitimate interests, we process photographs from company events for the purpose of promoting Trask externally so that we can present photographs and short videos from interesting events, parties, teambuilding or trainings that we organize for you, for example to your future colleagues. For this purpose, we process your personal data for as long as it is published.

**d) Protection of property and personnel**

In the event that you visit our offices, we process CCTV footage from the premises of the Trustee's building and on the basis of our legitimate interests in ensuring the protection and security of property and persons on our premises. For this purpose, we process your personal data for a period of one month after the recording was made.

**e) Measuring website traffic, creating statistics and records**

On the basis of our legitimate interests, we process data about your device and data about your behavior on the website in order to measure traffic to our website, to keep statistics and records and to optimize our website on the basis of these, for example. For this purpose, we process your personal data for a cookie-specific period time (see below).

**We may process your personal data with your consent for the following purposes:**

**a) Marketing**

On the basis of your consent to the use of so-called cookies (you can read more about this in the section "Use of cookies" below), we process data about your device and data about your behavior on the website in order to optimize the website, analyze and tailor its advertising content and display advertisements that are relevant and interesting to you. For this purpose, we process your personal data until your consent is withdrawn, unless it expires earlier (e.g. by the expiry of cookies).

## Use of cookies

When you visit our website, cookies or other similar technologies (collectively referred to as "cookies" for simplicity) are activated on your device. Cookies are small files that store information about your browsing experience and the device from which you are accessing the website to make it easier to use. For example, cookies allow the website to remember your preferences or show you the relevant version depending on whether you access it from your computer or phone.

You can call up a list of the cookies we use on our website, including their categories, directly on the website by clicking on the black "consent button" (the "on-off" checkbox pictogram) at the bottom left of the website. Here you can also adjust your preferences for the cookies that will be used.

## How do we protect personal data?

Ensuring the security of your personal data is one of our highest priorities. To this end, we have taken a range of measures to ensure the protection of your personal data, in particular to prevent unauthorized or accidental access to personal data, change, destruction or loss, unauthorized transfers, unauthorized processing, as well as other misuse of personal data.

We process your personal data exclusively through qualified personnel who are bound by confidentiality obligations. We carry out regular data protection and information security training of our staff.

We are also ISO 27001 certified and undergo annual audits for this purpose.

## Your rights in relation to personal data protection

You have legal rights associated with personal data protection that you may exercise at any time. These include:

- **The right to withdraw consent.** You have the right to withdraw your consent at any time. However, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
- **Right to object.** You have the right, for reasons relating to your particular situation, to object at any time to the processing of your personal data that may be carried out due to our legitimate interests, for the purpose of direct marketing, or to fulfil a task carried out in the public interest or in the exercise of public authority, should we be entrusted to such processing in the future. Should this concern data processing for direct marketing purposes, we will stop such processing without delay; in other cases, we will stop processing the personal data unless we prove serious legitimate grounds for processing that would override legitimate reasons on your part, or if we need to continue processing your personal data for determining, exercising or defending our legal claims.
- **Right to access personal data.** You have the right to know and obtain communication with regard to what personal data we process, for which purposes, the period for which the personal data are processed, the recipients of the personal data, and your rights associated with the processing of your personal data. All this information is included herein, but if you are not sure, you have the right to obtain from us comprehensive information about the processing and a copy of the personal data being processed. We will provide the first copy of your personal data free of charge, but we may charge a fee for additional copies.
- **Right to rectification.** You have the right to obtain from us without undue delay the rectification of inaccurate personal data and the right to have incomplete personal data completed, should you discover such inaccuracy or incompleteness.
- **Right to erasure.** You have the right to have your personal data erased if:
  - your personal data are no longer necessary in relation to the purposes for which we have processed them;
  - you withdraw your consent on which the processing is based and there is no other legal ground for the processing;
  - you object to the processing on the grounds of our legitimate interests and there are no overriding legitimate grounds for the processing on our part; or
  - if the personal data have been processed unlawfully or the personal data have to be erased for compliance with a legal obligation.
- **Right to restriction of processing.** You have the right to have the processing of your personal data suspended for a limited period of time if:
  - you contest the accuracy of the personal data; in such case we will suspend the processing for a period enabling us to verify the accuracy of the personal data;
  - the processing is unlawful, and you oppose the erasure of the personal data and requests the restriction of their use instead;
  - your personal data is no longer needed for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims; or
  - you object to processing; in such case we will restrict the processing until we verify whether our legitimate grounds override yours.
- **Right to data portability.** You have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller if the processing is based on consent and the processing is carried out by automated means.
- **The right not to be subject to automated individual decision-making with legal or similar effects, including profiling.** We never use your personal data for automated decision-making, including profiling.
- **The right to lodge a complaint with the supervisory authority.** Without prejudice to any other means of administrative or judicial protection, you have the right to lodge a complaint with the respective supervisory authority. The competent supervisory authority for the Czech Republic is the Office for Personal Data Protection residing at: Pplk. Sochora 27, 170 00 Prague 7, URL: [www.uoou.cz](http://www.uoou.cz); other data recipients should refer to their respective national data protection authorities, the list of which is also available on the website [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

## Contacts and information about exercising your rights

Should you have any inquiries, complaints or requests regarding the protection of your personal data, you can contact us by e-mail at: [GDPR@thetrask.com](mailto:GDPR@thetrask.com).

We will process your application without undue delay, but no later than in one month. In exceptional and more complex cases, we may extend this period by up to another two months, of which we will duly notify you including the justification for such delay.

In some cases, we may ask you to prove your identity. This is a precautionary security measure to prevent access to your personal data by unauthorized persons.