Information memorandum on the processing of personal data

In accordance with Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and on the repeal of Directive 95/46/EC (General Data Protection Regulation) - hereinafter referred to as the General Regulation - BOWTIE hereby informs data subjects of the conditions under which personal data provided by them is processed and protected and what rights do data subjects have in the field of processing and personal data protection.

1. Administrator of personal data

The controller of personal data is the company BOWTIE s.r.o., with its registered office at Bubenské nábřeží 306/13, Holešovice, 170 00 Prague 7, Hall 19, registered in the commercial register maintained by the Municipal Court in Prague under file number C, file number 369402, ID number: 17285500 (hereinafter also BOWTIE), which carries out business activities as a full service agent ura, especially in the field of branding, marketing, campaigns, organization of social, cultural educational events and related activities.

2. Commissioner for the protection of personal data

BOWTIE's personal data protection officer is Mgr. Vít Beránek, gdpr@bowtie.cz

3. Policy for personal data processing in BOWTIE

BOWTIE considers the protection of personal data important and pays great attention to it. BOWTIE processes personal data only to the extent that is necessary for its own activities, or related to the services it provides for its customers. BOWTIE protects personal data to the maximum extent possible and in accordance with applicable legal regulations. The principles and rules for the processing of BOWTIE personal data are further governed by the internal Guidelines on organization, personal data protection and data security, including all annexes. ("Directive", "Internal Directive") The Directive applies the principles and principles resulting from the general regulation:

1. The principle of legality, which imposes the obligation to process personal data always in accordance with legal regulations and on the basis of at least one legal title.

2. The principle of correctness and transparency, which imposes the obligation to process personal data transparently and to provide information on the method of their processing together with information on to whom BOWTIE will make personal data available. This also includes BOWTIE's obligation to inform data subjects of such facts in cases of serious security breaches or leakage of personal data.

3. The principle of purpose limitation, which allows personal data to be processed only for a clearly defined purpose.

4. The principle of data minimization, which imposes the obligation to process only personal data that is necessary, relevant and reasonable in relation to the purpose of their processing.

5. The principle of accuracy, which imposes the obligation to take all reasonable measures to ensure regular updating or correction of processed personal data.

6. The principle of storage limitation, which imposes the obligation to store personal data only for the time that is necessary for the specific purpose for which it is processed. As soon as the time necessary for processing or the purpose of processing has passed, personal data are deleted or anonymized, i.e. modified so that they cannot be linked to a specific person.

7. The principle of integrity and confidentiality, non-repudiation, and availability, which obligates the administrator to secure and protect personal data against unauthorized or illegal processing, loss or destruction. For these reasons, BOWTIE adopts numerous technical and organizational measures for the protection of personal data. At the same time, BOWTIE ensures that only authorized employees have access to personal data.

8. The principle of responsibility, which imposes on BOWTIE the obligation to be able to demonstrate compliance with all the principles and conditions listed above.

4. Purposes of personal data processing

In fulfilling its mission, BOWTIE processes personal data for the following purposes:

1. **Business activity** - especially then
o Organization of social, cultural and educational events for clients
o Preparation of campaigns for clients
o Marketing, branding
o Web creation,
o Other related activities

2. **Administration and operation of the organization**
o HR and payroll
o Economics and accounting
o Property management
o Operational agendas
o E-infrastructure (computing and storage systems, computer network, e-mail)
o Safety and health protection at work, fire protection, crisis management
o Internal education

3. **Property protection and security**
o Camera system
o Access to secure areas
o Security monitoring of IT infrastructure operation
o Processing of security incidents
o Object security

4. Information and promotional activities
o website - cookies see below
o Marketing and Promotion

5. Categories of persons whose personal data is processed by BOWTIE

BOWTIE processes personal data of the following categories of persons (data subjects):

1. Employees: persons in an employment-legal relationship with BOWTIE
2. Job seekers of a person applying for employment at BOWTIE,
3. External collaborators: persons without an employment relationship with BOWTIE actively involved in BOWTIE activities (e.g. freelancers)
4. Suppliers: persons and companies supplying services directly to BOWTIE (e.g. landlords, energy suppliers)
5. Clients: persons using BOWTIE services
6. Visitors or participants in events organized by BOWTIE
7. Participants in administrative or judicial proceedings conducted with BOWTIE

6. Categories of processed personal data

BOWTIE processes personal data provided directly by individual natural persons and personal data created or obtained as part of processing activities and necessary for their security.

1. **Identification data**: for example, name, surname, date and place of birth, marital status, social security number, title, nationality, personal document number, digital identifier, signature, etc.

2. **Contact information**: for example, address, email address, mailbox ID, phone number, etc.

3. **Descriptive data**: education, knowledge of foreign languages, professional qualification, knowledge and skills, portrait photograph, video/audio record of the person, previous employment, health insurance company, criminal record, etc.

4. **Economic data**: bank connection, salary, rewards, fees, liabilities and receivables, orders, purchases, taxes, etc.

5. **Work data:** records of work and work activities, employer, job title and position, job evaluation, job award, etc.

6. **Operational and location data**: data from electronic systems relating to a specific data subject - e.g. data on the use of information systems, on data traffic and electronic communication, on the use of the telephone, on access to various spaces, records from camera systems, etc.

7. **Data on the subject's activities**: participation in organized events, involvement in projects, data on work trips, etc.

8. **Data about another person:** address and identification data of a family member, spouse, child, partner, etc.

9. **Special category of personal data**: sensitive personal data capturing information about health status, trade union membership, etc.

7. Legal reasons for processing personal data

The legal basis for the processing of personal data in the above-mentioned areas of activity is always at least one of the listed legal reasons:

1. Fulfillment of the legal obligation applicable to the administrator: personal data is processed by BOWTIE for the purpose of fulfilling the legislative obligation as an administrator. In particular, Act No. 262/2006 Coll., Labor Code; Act No. 563/1991 Coll., on accounting; Act No. 127/2005 Coll., on electronic communications; Act No. 480/2004 Coll. about some information society services; Act 181/2014, on cyber security; Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons in connection with the processing of personal data and on the free movement of such data and others.

2. Fulfillment of the contract: personal data is processed by BOWTIE for the purposes of concluding a contractual relationship and subsequent fulfillment from it, or before concluding a contract.

3. Consent of the data subject: personal data are processed on the basis of the consent given by the data subject for one or more specific processing purposes.

4. Protection of the interests of the data subject: processing is necessary to protect the vital interests of the data subject or another natural person.

5. Public interest: processing is necessary for the fulfillment of BOWTIE tasks carried out in the public interest or in the exercise of public authority.

6. The administrator's legitimate interest, which mainly consists in about securing business activities for fulfilling BOWTIE's mission on the transfer of personal data for internal administrative and operational purposes on property protection, fraud prevention, damage prevention on ensuring the security of IT infrastructure and information.

8. Transfer of personal data

The transfer of personal data to another person is possible only on the basis of a specific legal regulation that regulates such an option or obligation, or on the basis of the consent of the data subject. Recipients of personal data for the purpose of fulfilling BOWTIE's legal obligations are usually public authorities.
In justified cases, personal data stored in BOWTIE information systems may be processed by processors - external service providers, exclusively on the basis of a personal data processing contract. These are mainly:

1. operators of information systems and software
2. external experts in individual agendas, external consultancy providers.
3. Processors who, together with BOWTIE, participate in the delivery of the service (e.g. organizing an educational event for the client) and who also need this data to ensure the realization of the purpose of the given service.

The transfer of personal data to countries outside the European Union is possible exclusively on the basis of a legal regulation or an international agreement to which the Czech Republic is bound. The free movement of personal data within the European Union is not restricted or prohibited due to the protection of natural persons in connection with the processing of personal data.

9. Period of retention of personal data

Personal data is stored only for the time necessary in relation to the given personal data processing activity and in accordance with generally binding legal regulations, the internal Directive, including annexes.
Personal data that BOWTIE processes on the basis of the data subject's consent is only stored for the period for which the consent was granted and for the duration of the purpose for which the consent was granted.

10. Rights of the data subject in the processing of personal data

According to Articles 15-22 of the General Regulation, the data subject has the right
1. to access personal data
2. to correct personal data
3. to delete personal data
4. to limit the processing of personal data
5. on portability of personal data
6. withdraw consent to the processing of personal data
7. object to the processing of personal data a
8. the right not to be the subject of a decision based solely on the automated processing of personal data concerning one's person.

11. Exercising the data subject's rights

The data subject is entitled to exercise his rights against the administrator of personal data resulting from the general regulation, namely: by sending a request in the form of an e-mail message to the address: gdpr@bowtie.cz

12. The right to file a complaint with the supervisory authority

The data subject has the right to submit a request, complaint or initiative for the processing of personal data to the supervisory authority. Office for the Protection of Personal Data, Lt. Col. Sochora 27, 170 00 Prague 7, ÚOOÚ data box ID: qkbaa2n, phone number: +420 234 665 111, website: www.uoou.cz, email address: posta@uoou.cz

13. Accessing Your Personal Information Online

If the subject has provided his data through the information system managed by BOWTIE, he can access the overview-management of his personal data directly through the user interface of the information system, if this interface is active. Otherwise, the email procedure applies, see above.

14. Reporting a security breach, leak, or loss of personal data or confidential information

To report a suspected breach of security, leakage or loss of personal data or confidential information, please contact us immediately by email to the address:

gdpr@bowtie.cz

Information that you may receive from us as part of communication may be legally protected and is always intended only for the intended recipient. If you receive information with an error in the address or transmission, without being the intended/authorized recipient, please inform us of this fact at the email indicated in the previous paragraph.
If you have received information without being the intended/authorized recipient, you are not permitted to pass it on in any way.

15. Special information for visitors to our website about the use of so-called cookies

When you use our website www.bowtie.cz (hereinafter referred to as the "Website"), the Administrator receives and records information from your browser, which may include personal data. We use a variety of methods to collect this information, such as so-called cookies; this information may include your IP address, a unique identifier using "cookies", information about cookies and information about whether your device has software needed to access certain features, a unique identifier of your device and device type, domain, browser type and language, type of operating system and its settings, state and time zone, previously visited websites, information about your steps on our Websites, such as clicks, purchases made and marked preferences and access time and referring URLs.

We use cookies to track how our visitors use the Website, this allows us to provide services to our customers and improve their online experience. We also use cookies to obtain summary data on website traffic and communication, to identify trends and obtain statistical data with the aim of further improving our website.

We use so-called functional cookies on our website: these cookies are required for the basic functioning of the website and are therefore always switched on; these include cookies that allow you to be remembered when you browse our website during a single visit, help to create the contents of the shopping cart and go through the payment process if this functionality is made available and applied, and also help in security and in meeting the requirements set by legal regulations.

The legal basis for processing the above-mentioned data for the given purposes is the Administrator's legitimate interest for the purpose of ensuring proper functionality and basic analysis of website traffic.

We might be also using analytical cookies on some of our websites, which help us collect information about the use of the website and thus give us the opportunity to constantly improve our website. These cookies collect information in a way that does not directly identify anyone.

In this case, the legal basis for processing the above-mentioned data for the given purposes will be your consent.

16. Special information about the use of the camera system in the company's premises.

A security camera system is used in the premises of our office, the purpose of which is to monitor entrances and record any possible unauthorized intrusions into these premises. Recordings from these cameras are kept for a maximum of 90 days from the time of recording and are then automatically deleted.

In the event of a security incident (e.g. in the event of a break-in, vandalism, theft, accident), the record may be kept for the time necessary to properly investigate the incident and to exercise the rights and obligations that the company may incur in connection with the incident. In the event of a security incident, the security record may also be transferred to third parties, depending on the nature of the incident and the purpose. (e.g. law enforcement or insurance companies).

The purpose of this system is the protection and security of the company's property, the legal basis for the processing of the above-mentioned data for the given purpose in this case is the company's legal interest in the protection of property and data security.