

## Information about the processing of personal data

This document serves to inform you about the methods of personal data processing in Boston Capital Service (BCS) Ltd. (further on „BCS“) solutions and about your related rights. All processing of personal data is based on the current legislation and, in particular, on the General Data Protection Regulation (GDPR).

The current version of this document is always available on the company's website [www.bostoncapitalservice.com](http://www.bostoncapitalservice.com)

Our company processes all personal data with the utmost emphasis on security and uses the adequate technical means available to protect them. In case of any doubt or queries, you can contact the staff responsible for the processing of personal data by e-mail [info@bostoncapitalservice.com](mailto:info@bostoncapitalservice.com).

## Who and when does process your personal data?

The company **BOSTON CAPITAL SERVICE (BCS) LTD.**, 71-75, Shelton Street, Covent Garden, London, WC2H 9JQ, UNITED KINGDOM, is registered by Registrar of Companies for England and Wales, incorporated under the Companies Act 2006 as a private company, the company is limited by shares, and the situation of its registered office is in England and Wales.

BCS processes your personal data only to the extent necessary and only if at least one of the following conditions is met:

- you gave us your consent to do so
- there is a legitimate interest on our part
- it occurs in the context of performance of contractual arrangements
- it occurs in the context of fulfilment of the obligations arising for us from the generally binding legal regulations

Personal data that are necessary for the proper fulfilment of all obligations of BCS, whether those obligations arise from contractual arrangements or from generally binding legal regulations, must be processed by us even after the possible withdrawal of your consent.

BCS collects personal data and bears responsibility for the proper and lawful processing of personal data. You can exercise your privacy rights in relation to our company (as described herein below).

## What personal data do we process?

We primarily process personal data that are necessary for us to establish or maintain business relationships. Specifically, these are:

- address and identification data used for the unambiguous and unmistakable identification of the data subject (e.g. name, surname, title, birth certificate number, date of birth, permanent address, ID No., Tax ID. No.) and information allowing contact with the data subject (contact details – e.g., contact address, telephone number, fax number, e-mail address and other similar information),
- descriptive data (e.g., bank account details),
- other data necessary for the performance of contract (based on a specific contractual arrangement),

Data provided beyond the relevant laws processed based on the consent granted by the data subject (processing of photographs, use of personal data for human resource procedures, etc.). Special categories of personal data (sensitive data) are not processed by us and we do not use personal data for automated decision-making, including profiling

## Your privacy protection rights

Every data subject has the following rights under the applicable legal regulations, which they may exercise at any time:

- **Right to be informed about the processing of your data** – in particular, information about the purpose of the processing, the identity of BCS, its legitimate interests, the recipients of personal data, if they are transferred to other persons
- **Right of access to personal data** – upon request, we provide you with information about your personal data kept by us
- **Right to rectification or completion** – if you require modification of the data, we will do so
- **Right to erasure** – we will delete the data about you at your request unless it conflicts with other purposes for which we must continue to keep the data
- **Right to restriction of processing** – you may define the restrictions for the processing of your data unless it conflicts with other purposes of processing
- **Right to data portability** – we can transfer your data based on your instruction to another person
- **Right not to be subject to automated individual decision-making with legal or similar effects, including profiling** – BCS currently does not automatically process your data or perform profiling
- **Right to object** – whenever you do not agree with something, please contact us

You have the right to withdraw the consent given to the processing of your personal data at any time and the right to lodge a complaint with the Supervisory Authority (Office for Personal Data Protection, address: Pplk. Sochora 27, 170 00 Prague 7, phone: 234 665 111, web: [www.uoou.cz](http://www.uoou.cz)).

## How do we collect personal data?

- **We obtain data directly from the data subject** (the person to whom the personal data relate, i.e. you) **in the context of the negotiation about the establishment of a business or contractual relationship** (you submit the data to us based on your interest in our services or products or for the purpose of preparation of the contractual documents).
- In a similar way, **we also collect data in the context of an ongoing business or contractual relationship** (we communicate with each other, e.g. through e-mail, telephone or other channels, and pass business cards, contracts and other documents)
- **We collect certain data from publicly available sources** (registers, websites, social networks or media)

## Why do we process personal data?

The main reason for processing your personal data in BCS consists in our business activities and the fulfilment of our obligations to you, i.e. in order to negotiate a business relationship and subsequently to fulfil the contractual arrangements, typically our deliveries of products and services.

Personal data are also important to us for:

- the recruitment of new job seekers
- the protection of the rights of BCS, the recipient or other persons concerned
- the fulfilment of other legal obligations

A specific category then consists of data that we process **based on the consent given by you**. **We always process these data only for the specific purpose**, which must be an integral part of the wording of any consent.

## For how long do we process personal data?

The period of processing of personal data depends on its purpose.

<b>Data provided on the basis of consent</b>	Throughout the validity of the consent, i.e., either for the period specified in the wording of the consent, or until your withdrawal of the consent to the processing
<b>Data provided in the context of the performance of contract or in order to protect the rights of BCS</b>	The period is generally determined by the applicable legislation
<b>Data provided in the context of the negotiation on a contractual and business relationship</b>	3 calendar years following the receipt of personal data
<b>Data provided during the recruitment of new job seekers</b>	For the duration of the selection procedure for the job

## How do we protect personal data?

The processing of personal data is carried out exclusively by BCS or by an authorised processor based on a contract for the processing of personal data. BCS has concluded contracts with the processors for the processing of personal data in the area of human resources and payroll, accounting and healthcare. The employees and cooperating persons have received the identification of these processors in a separate document “Consent to the processing of personal data and information about the purpose of the processing of personal data”.

BCS is bound by the obligation of confidentiality and the obligation to use personal data in accordance with the purposes for which the personal data have been made available to us.

The processing is carried out in the establishments, branches and headquarters by individual authorised employees of BCS or, as appropriate, the processor.

The processing is done by means of computer technology and manually for personal data in paper format in compliance with all the security policies for the administration and processing of personal data. To this end, BCS has taken measures to ensure the protection of personal data, in particular, measures to prevent unauthorised or accidental access to personal data, their alteration, destruction or loss, unauthorised transmissions, unauthorised processing, as well as other misuse of personal data.

**BCS conducts regular employee training on the issues of GDPR.**

## Information about cookies on BCS's website

Cookies are small data files that make the visited websites remember the actions and settings of individual users that they have performed on them, so that these data need not be re-entered. Cookies are stored on individual computers through a web browser. Cookies do not pose danger, are not used to obtain any sensitive personal data, but are important for privacy protection.

**BCS does not use cookies to identify the identity of website users or to misuse the login information.** Another group are third-party cookies (such as Google Analytics for traffic analysis of a specific web page or a certain service, or cookies of the operators of advertising systems that are operated on our website). These cookies are controlled by third parties and we do not have access to reading or writing such data.

## Withdrawal of consent and exercise of the rights of data subject

**You may withdraw your voluntarily given consent to the processing of your personal data and exercise your rights of the data subject at any time and free of charge by means of a letter in paper form with a certified signature sent to the above address of BCS,**

This a precautionary security measure to prevent unauthorised persons from accessing your personal data. The withdrawal of consent does not affect the possibility to continue processing your personal data based on your consent that was given prior to its withdrawal. The withdrawal of consent has no effect on the processing of personal data that we process on a legal basis other than consent (i.e., in particular, if the processing is necessary to perform contract or legal obligations or for other reasons stipulated in the applicable legal regulations).

## Contact details for sending suggestions and complaints

In case of any inquiry or suggestion concerning the protection of personal data you can contact us at the e-mail address [info@bostoncapitalervice.com](mailto:info@bostoncapitalervice.com).