



SECAR BOHEMIA, a.s.
Londýnská 48, 120 00 Praha 2, Česká republika
IČ: 47115467 DIČ: CZ47115467
T +420 221 513 111, www.sherlog.cz

Personal Data Protection Principles

Dear Client of a Company of the SECAR BOHEMIA a. s. Group,

SECAR BOHEMIA a. s. takes your privacy and confidential information seriously. Our approach to the protection of your privacy is based on the following principles:

We appreciate your trust that you show by entrusting us with your personal data. We will always use your personal data in an honest and fair manner in order not to jeopardize your interests and your trust.

We provide transparent information about how we handle your personal data. You will always know which data we collect, what we are doing with them, with whom we share them and who you should contact in case of any doubts.

We take and will take all necessary measures to properly secure and protect your personal data against unauthorized use.

We comply with all requirements stipulated in legal regulations on the protection of personal data and, in doing so, we cooperate with competent authorities.

We protect the data of our corporate clients, legal entities, the same way we protect the personal data of individuals.

The company of the SECAR BOHEMIA a. s. Group, with which you have a legal, especially contractual, relationship, always bears the responsibility for complying with the Personal Data Protection Principles.

Sphere of Action of the Principles

The Personal Data Protection Principles apply to personal data collected, processed and used by the companies of the SECAR BOHEMIA a. s. Group in connection with providing their services to their clients. For more information about the SECAR BOHEMIA a. s. Group, go to www.secar.cz.

The Personal Data Protection Principles also apply to information provided by corporate clients, legal entities.



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Consent

By using the SECAR website, you provide the relevant company of the SECAR Group with your consent to collect, use and disclose your personal data in compliance with these Personal Data Protection Principles. In the case that you do not consent to such collection, use and disclosure of your personal data, please stop using the SECAR website and do not provide your personal data to any company of the SECAR Group in any way.

The companies of the SECAR Group will collect, use and disclose your personal data only where permitted by law and as part of your contractual relationship with a company of the SECAR Group. In most cases, we will explicitly ask for your consent; however, in some cases, your consent may be implied based on your activity or conduct. In the case that it is necessary to use your personal data for purposes other than those mentioned in these Personal Data Protection Principles, we may ask for your consent. You are not obliged to provide your consent.

You also provide your consent by executing a contract on services provided by the SECAR Group.

Children

Due to the nature of services provided by the companies of the SECAR Group, our clients are mostly adults. The collection, processing and disclosure of a minor's personal data by a company of the SECAR Group requires the prior written consent of the parents or guardian of the minor.

The same applies to persons with limited capacity.

Collected Information

Personal data mean information, or part thereof, that may identify you. Such information includes in particular first name, last name, date of birth, address, user name, profile picture, e-mail address, phone number, IP address, etc. Personal data also mean numbers of submitted documents, your bank account details, information about your payment ethics. Personal data also include operation and localization information obtained in providing services, in particular in securing vehicles, locating stolen vehicles and managing and online monitoring vehicles, machinery, containers and persons.

In addition to information that you provide us with directly, in particular in connection with providing services, e.g. when a contract on services provided by the companies of the SECAR Group is executed, we obtain information automatically when you use the SECAR website. Such information includes in particular the information about your web browser, IP address,



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user name and profile picture as well as details about the websites you visited, the links you used and other information that you allowed to share when using the websites of third parties.

The majority of web browsers are preset to accept cookies. You can modify the settings of your browser to block cookies or to inform you when cookies are sent from your computer. In the case that you use different browsers or several computers, you need to change the settings for each browser and each computer. Please take notice of the fact that the blocking of cookies may result in less comfort or may limit some functions when using the SECAR website.

We may also obtain your personal data from other authorized sources, including commercially available sources, such as public databases, data collection tools and information from third parties.

Operation Data

Operation data mean all data processed for the purposes of securing vehicles, locating stolen vehicles and managing and on-line monitoring vehicles, machinery, containers and persons.

Depending on the nature of a service, these data mean in particular:

- Data concerning the client himself, including data about a surveyed vehicle;
- Data concerning the monitored movement of a vehicle, including the vehicle movement history;
- Data concerning the monitored movement of surveyed items, including history;
- Data concerning the monitored movement of surveyed persons, including history.

We keep operation data, and our clients can access them remotely; the company is not responsible for consequences of a breach of the remote access rules by our clients (e.g. when a client provides his password to a third party).

Operation data are processed for the purposes of providing and billing services.

Localization Data

Localization data are produced as a result of provided services and determine the geographical position of surveyed items and persons.



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Purpose of Using Personal Data

Besides providing services, we may use your personal data:

- a) to improve our services and your comfort in using the SECAR website.
- b) to contact you regarding our products and services that may interest you, provided that you gave us your consent to do so, or to contact you regarding a previously requested product or service and this is why this communication concerns your previous request and takes place within a certain time-limit.

You can decide at any time not to receive such information. Any direct commercial information sent by us contains information about how to stop its receiving.

- c) to offer products or services that you requested or that we assume may interest you.

Disclosure of Personal Data to Third Parties

Your personal data may be shared between the individual companies of the SECAR Group.

We may have a third party process your personal data, but always based on a proper contract that will ensure that your interest will not be jeopardized. Such a party acts as a personal data processor pursuant to the Act on the Protection of Personal Data. The SECAR Group pays maximum attention to selecting its contractual partners.

We are obliged to provide your personal data to a competent state authority, provided that such an authority requests them in a way stipulated by law.

In the case that we provide your personal data to another company within the SECAR Group or to a trustworthy third party, we will make maximum efforts to ensure their protection and we will take necessary measures to protect them against unauthorized use and to ensure that they are used only in compliance with our instructions, these Personal Data Protection Principles and other effective laws and regulations on the protection of personal data.

Processing of Personal Data

Your personal data are processed in the scope and during the time necessary to ensure these basic purposes; however, only during the term of the contract or until the rights and



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obligations arising from the contract are settled or as long as applicable legal regulations require.

Pursuant to Sections 20z and 20za of Act No. 634/1992 of Coll., on the consumer protection, and for the purposes of protecting the rights and legally protected interests of sellers and consumers, the companies of the SECAR Group have the right to automatically submit clients' identification data and information about their financial standing, payment ethics and trustworthiness to the register, which informs sellers about the ability and willingness of consumers to pay their financial obligations, without the consent of clients (who, pursuant to the cited provisions, are data subjects). This also applies to relationships established on the basis of clients' business or any other gainful activity. The companies of the SECAR Group can participate in the activity of the Register of Individuals and the Register of Entrepreneurs operated by SOLUS or similar registers. These registers contain a database of entities (data subjects) that breached their contractual obligation to duly pay for a provided service, and the companies of the SECAR Group have the right to look in these registers in order to verify and evaluate clients' payment ethics without their consent both upon the establishment of the contractual relationship and any time during the term of the contract.

Sharing of Personal Data with Other Administrators

Unless the law stipulates otherwise, a company of the SECAR Group may provide your personal data to other data administrators only with your prior consent. This consent is optional and can be revoked at any time. However, the revocation of your consent may not affect the scope of the services provided by the companies of the SECAR Group.

Security and Protection of Your Personal Data

We will use all reasonable means and measures to protect your personal data and we will request the same from third parties that will process your personal data.

Access to your personal data is prohibited in order to prevent unauthorized access to your personal data and their modification or unauthorized use. Only employees of the companies of the SECAR Group and the entities, with which a company of the SECAR Group executed a personal data processing contract, are authorized to access your personal data and only in the scope required for the given purpose.

Information about Processed Personal Data

Pursuant to Sections 11 and 12 of the Act on the Protection of Personal Data, everybody has the right to access his personal data and information.



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Therefore, you can ask us about which of your personal data we keep. As any other entity, we are obliged to keep updated and true data, which requires your cooperation. Please comply with this obligation and, in the case of any change in your personal data (usually last name, permanent address, invoicing address, etc.), report and prove such a change to us.

The companies of the SECAR Group focus on the prevention of unauthorized use of personal data. In the case that you suspect a breach of any legal obligation on our part, you can ask us to investigate your suspicion and to explain and remedy the matter. We will remedy the situation within a time-limit reasonable in view of the technical and administrative capacities of the companies of the SECAR Group and the seriousness of the breach of our obligation.

In the case that you are not happy with our resolution of the matter, you can contact the Office for the Protection of Personal Data (www.uoou.cz) and request a remedial measure.

Change in the Personal Data Protection Principles

These Personal Data Protection Principles may be changed from time to time and their updated version will be posted on the SECAR website. We will keep you informed about any change in this document. We recommend that you visit our website regularly and reasonably often to get updated information about how we use your personal data.

JUDr. Jan Šula v.r.

CEO