



Privacy Representation of Clarkson Hyde Czech Republic

(Hereinafter the “Representation”)

The below-provided information about personal data processing applies to relationships of the Clarkson Hyde Czech Republic Group companies with clients, vendors and subcontractors.

Latest update: 31 August 2024

A Definition of Terms Used in the Representation

“**Clarkson Hyde CA**” means one or more companies of the Clarkson Hyde Chartered Accountants Group, which includes a network of member firms and their related entities, thus constituting a global network of cooperating companies. Each company of the Clarkson Hyde CA Group is a legally separate and independent entity, which cannot assume mutual obligations or obligations toward third parties. Each company of the Clarkson Hyde CA Group is only responsible for their own acting and omissions. Additional information is available at <https://www.clarksonhyde.com/about-us/>.

“**Clarkson Hyde Czech Republic**” means Clarkson Hyde CA: Clarkson Hyde Czech Republic Tax, s.r.o., Clarkson Hyde Czech Republic Audit, s.r.o., Clarkson Hyde Czech Republic Accounting, s.r.o., and Clarkson Hyde Czech Republic Light, s.r.o.; Clarkson Hyde Czech Republic Group companies are legally separate and independent entities, which cannot assume mutual obligations or obligations toward third parties. Each company of the Clarkson Hyde Czech Republic Group is only responsible for their own acting and omissions. Additional information is available at <https://www.clarksonhyde.cz/cs/o-spolecnosti>.

“**GDPR Regulation**” means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

“**Personal Data**” means any personal data, which include information concerning an identified or identifiable natural person (data subject) processed as part of providing services or in connection with the services’ provision to our clients, or in connection with contractual relationships with our vendors, contractual partners or subcontractors, or if needed for the purposes of activities, which are part of our standard business procedures.

“**Controller**” (and hereinafter “**we**”) means the Personal Data Controller who specifies purposes of Personal Data’s processing. For the purposes of this Representation, the Controller shall be companies from the Clarkson Hyde Czech Republic Group, which are a party to a contract with a client, vendor, contractual partner or a subcontractor.

“**Processing**” means any (manual or automated) operation or a set of operations with Personal Data or a set thereof, such as collection, recording, arrangement, structuring, storage, use, disclosure, restriction, erasure or destruction.



“**Processor**” means a Personal Data Processor who processes Personal Data on behalf of and for the Controller.

“**Recipient**” means a natural or legal person, public authority, agency or another body, to which Personal Data are disclosed.

“**Personal Data Protection Regulations**” mean applicable national and EU laws to the extent of application thereof at a certain moment, which involve (i) Czech laws implementing Directive 95/46/EC on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and Directive 2002/58/EC on privacy and electronic communications; (ii) the GDPR Regulation; and (iii) other applicable Czech laws concerning personal data protection.

“**EU Decision on Adequacy of Legal Protection**” means a specification of countries that adopted a certain level of Personal Data’s legal protection equivalent to the protection under the GDPR Regulation. This decision guarantees a free flow of Personal Data from the EU Member States to those countries (namely Switzerland, Japan, United States and United Kingdom) without a need for additional Personal Data protection guarantees or measures of those countries.

B Personal Data Processing by Clarkson Hyde Czech Republic

This Representation contains information about what Personal Data we process, why we process them, whether and how we share Personal Data, and what rights you have as a Personal Data subject.

This Representation is valid from the date provided in this document’s opening and can be modified or completed from time to time. We therefore recommend getting back to it regularly to see, if it was modified/changed.

(1) What Personal Data Do Clarkson Hyde Czech Republic Process?

We process Personal Data that you as a Personal Data subject provide to us or that we obtain from your employer or a contractual partner or another third party, or that you make expressly publicly available, or that have otherwise fallen into public domain (namely through online media).

Personal Data include, but are not limited to, the following information:

- First and last name, business form, date of birth, Company ID and sex;
- Job title or position;
- Contact details such as address, phone number or email;
- The history and details of your business contacts with Clarkson Hyde Czech Republic;
- Bank account number;
- IP address;
- Personal Data that we obtain from you in connection with your exercising your rights in compliance with this Representation; and
- CCTV footage and other information that we collect when you enter our premises (detailed and modified information about this Personal Data processing is available in the concerned building, if relevant - CCTV footage can also be processed by the building’s owner or an authorised third party).



This Representation does not contain an exhaustive enumeration of Personal Data categories, which are processed. Additional Personal Data categories related to the provision of specific services are provided below in the Privacy Representation of Clarkson Hyde Czech Republic Applicable to Services Provided by the Clarkson Hyde Czech Republic Group as the Personal Data Controller, and the Privacy Representation of Clarkson Hyde Czech Republic Applicable to Services Provided by the Clarkson Hyde Czech Republic Group as the Personal Data Processor.

(2) Why and on What Grounds Do Clarkson Hyde Process Personal Data?

We process Personal Data for the below-specified purposes:

- Discharge of legal duties: In order to comply with effective statutory, regulatory or professional requirements (namely under Act No. 253/2008 Coll., on Certain Measures against Money Laundering and Funding of Terrorism, as subsequently amended, and other relevant laws);
- Performance of contracts: In order to arrange for and to perform contracts (administration of contracts, financial accounting), where the data subject is a party to the contract, primarily contracts for the provision of our consulting services, discharge of contractual duties toward employees, cooperating individuals, vendors and business partners, pre-contractual negotiating with job or cooperation candidates, including feedback and complaints, and assessment and enhancement of business opportunities;
- Protection of Clarkson Hyde Czech Republic's legitimate interest: In order to protect legitimate interests and rights of the Clarkson Hyde Czech Republic Group's members, namely to protect our business interests (including compliance with internal regulations, risk analysis and prevention and client relationships);
- Protection of third parties' legitimate interest: In order to protect third parties' interests (primarily clients) in line with consultancy rules or for the purpose of making sure that received complaints or requirements are processed on a due basis;
- Cooperation with government bodies: In order to process requirements of relevant bodies and to communicate with them;
- Use of IT systems: For the purpose of using systems and applications (hosted or in-house) for IT services, primarily for the communication or archiving purposes;
- Processing of requirements entered through e-forms: For the purpose of processing requirements entered primarily by job candidates, as well as other types of requirements concerning cooperation with Clarkson Hyde Czech Republic Group members on the website of the Clarkson Hyde Czech Republic Group; and
- Sending commercial communications and other marketing communication.

We do not collect or process any "sensitive Personal Data" or "special categories" of Personal Data pursuant to the Personal Data Protection Regulations for the purposes specified above.



We only process Personal Data in cases where Personal Data processing is necessary and with reference to the following:

- A formed contract: For the purposes of administering contracts entered into between Clarkson Hyde Czech Republic and you or to take steps leading to formation of a contract with you;
- Laws: In order to comply with statutory duties imposed by laws or where permitted by laws;
- Express consent: We also process Personal Data based on your express consent, for example in the case of delivering commercial communications by email; or
- Legitimate interest: In compliance with the Personal Data Protection Regulations.

(3) How Long Do Clarkson Hyde Czech Republic Store Personal Data?

We store Personal Data for no greater than ten years from the provision of a service to our clients, or for a period of ten years from termination of contractual relationships with our vendors, contractual partners or subcontractors, as the case may be, or as required by effective legislation or other regulations, or for the purposes of legitimate interests of the Clarkson Hyde Group.

(4) Who Do Clarkson Hyde Czech Republic Share Personal Data with?

Your Personal Data can also be provided (transmitted) to the below-provided recipients and processed thereby, but only to the extent permitted for the purposes under Article A.2 of this Representation and the Personal Data Protection Regulations.

Every recipient is responsible for arranging for adequate protection of Personal Data, provision of information about Personal Data processing and obtaining additional consents, if required. Where your Personal Data will be transmitted abroad (including to non-EU and non-EEA territories), such transmission will only be carried out if duties defined by the Personal Data Protection Regulations with regard to such transmissions are met.

- Clarkson Hyde Czech Republic companies
- Clarkson Hyde CA Group companies

A list of companies, which are members of the Clarkson Hyde CA Group, is available here: <https://clarksonhydeglobal.com/find-a-firm/>.

- Processors

Clarkson Hyde can establish contractual cooperation with service providers in the Czech Republic and in other EU Member States as well as non-EU countries to provide for proper administrative, technical and operating support (the “**Contractual Partners**”). These Contractual Partners will primarily provide for technical and consulting services, translation and IT services as Personal Data Processors. All Contractual Partners have entered into an agreement on Personal Data processing with Clarkson Hyde Czech Republic. This agreement complies with standards pursuant to the Personal Data Protection Regulations. Upon request, we will provide you with a complete listing of all our Contractual Partners (Personal Data Processors), who process your Personal Data.



(5) How Do Clarkson Hyde Czech Republic Provide for Secure Personal Data Processing?

Clarkson Hyde Czech Republic and their Personal Data Processors have a special guarantee system in place, which complies with standards adopted in areas of the Clarkson Hyde Czech Republic Group's operation. Those guarantees (technological, physical, administrative and procedural) (i) enhance protection and confidentiality, integrity or availability of all processed Personal Data; (ii) prevent unauthorised use of Personal Data and unauthorised access thereto; and (iv) prevent Personal Data breach in compliance with internal procedures of Clarkson Hyde Czech Republic and applicable Personal Data protection laws.

(6) What Are Your Rights in Relation to Personal Data Protection?

You have the following rights in connection with you Personal Data's processing:

- Right of access to Personal Data, including the right to request a copy of the Personal Data, which are processed;
- Right to rectification of wrongly recorded Personal Data, including the right to updates of Personal Data;
- Right to erasure of Personal Data, if practicable in a particular case; and
- Right to restriction of Personal Data Processing by Clarkson Hyde Czech Republic.

Under the GDPR Regulation, you can object to Personal Data Processing in certain cases. In addition to this, you can exercise your right to Personal Data portability, which includes the right to receive a copy of the Personal Data that you provided to Clarkson Hyde Czech Republic. You can also ask Clarkson Hyde Czech Republic to have companies from the Clarkson Hyde Czech Republic Group transmit the Personal Data to other Personal Data recipients.

You can exercise and enforce the above-mentioned rights electronically at the following dedicated email address: info@clarksonhyde.cz, or in a letter sent to Clarkson Hyde Czech Republic, Politických vězňů 1272/21, 110 00 Praha 1 – Nové Město. These two contacts can also be used to ask questions regarding your Personal Data's processing.

If you believe that your Personal Data's processing violates the GDPR Regulation in any way, you can file a complaint. The complaint is filed with a supervisory authority in the EU Member State of your habitual residence or place of work. The Personal Data Protection Office (www.uoou.cz) is the supervisory authority in the Czech Republic.



Privacy Representation of Clarkson Hyde Czech Republic Applicable to Services Provided by the Clarkson Hyde Czech Republic Group as the Personal Data Controller

*This representation applies to the provision of the following services by the Clarkson Hyde Czech Republic Group as the Personal Data Controller: **Audit, Tax, Accounting and Payroll Processing**, as defined on the website of Clarkson Hyde Czech Republic, including sub-services.*

(1) What Personal Data Do Clarkson Hyde Czech Republic Process?

As the Controller, Clarkson Hyde Czech Republic process Personal Data provided to Clarkson Hyde Czech Republic by you. Personal Data can include Personal Data of your family members (e.g. your children or spouse) or representatives, if necessary due to the type of the provided services, and in addition to this, also Personal Data provided to Clarkson Hyde Czech Republic by your employer, contractual partner or a third party, unless the Personal Data were acquired illegally.

Depending on the provided service's type, Personal Data include, but are not limited to, the following information:

- First and last name, sex, date of birth, birth number, tax ID and Company ID;
- Information provided in an identity card (civil identity card, passport);
- Address of residence and/or permanent residence;
- Email address and/or contact phone number (both private and business);
- Other data for the purpose of providing a certain service type (family status, number of children, information about family members, including their first and last name and date of birth);
- Job title under the employment contract;
- Data about the financial situation, including data about a bank account, income from employment or another income-generating activity and from investments; and
- Data on your relationship with Clarkson Hyde Czech Republic's clients based on the purchase of goods or provision of a service.

(2) For What Purposes Do Clarkson Hyde Czech Republic Process Personal Data?

Clarkson Hyde Czech Republic process Personal Data on the basis of a contract entered into for the purpose of providing services either directly to you or to Clarkson Hyde Czech Republic's clients who can include your employer or a contractual (business) partner.

(3) What Tools Do Clarkson Hyde Czech Republic Use to Process Data?

Clarkson Hyde Czech Republic use special tools to process Personal Data in certain types of services.



(4) On What Grounds Do Clarkson Hyde Process Personal Data?

- With reference to discharge of statutory duties: In order to comply with effective statutory, regulatory or professional requirements (namely under Act No. 253/2008 Coll., on Certain Measures against Money Laundering and Funding of Terrorism, as subsequently amended, and other relevant laws) in connection with the provision of services to you, your employer or a contractual (business) partner, if laws mention that Clarkson Hyde Czech Republic are in the position of a Personal Data Controller in providing the particular services; and
- With reference to a formed contract: In order to provide for the performance of a contract, which you are a party to, or where you are not, due to a justified interest of Clarkson Hyde Czech Republic to provide services to your employer or a contractual (business) partner.

(5) How Long Will Clarkson Hyde Czech Republic Store Personal Data?

Clarkson Hyde Czech Republic store Personal Data for no greater than ten years from the provision of a service to you or to clients of Clarkson Hyde Czech Republic. Clarkson Hyde Czech Republic can also store Personal Data for a different period of time, if required by applicable Czech or EU legislation or where necessary for the purposes of legitimate interests of Clarkson Hyde Czech Republic.

(6) Who Do Clarkson Hyde Czech Republic Share Personal Data with?

Clarkson Hyde Czech Republic can provide (transmit) Personal Data for the purposes specified in Section 2 of this Representation to the following persons:

See above in Part **B. Personal Data Processing by Clarkson Hyde Czech Republic**, Section 4.

(7) What Tools Do Clarkson Hyde Use to Process Data?

You can be asked for access to a specialised tool or an application and required to enter Personal Data for certain types of services.

(8) Processing Security

Clarkson Hyde Czech Republic and Personal Data processors for Clarkson Hyde Czech Republic have a special guarantee system in place, which complies with standards adopted in areas of the Clarkson Hyde Czech Republic Group's operation. Those guarantees (technological, physical, administrative and procedural) (i) enhance protection and confidentiality, integrity or availability of all processed Personal Data; (ii) prevent unauthorised use of Personal Data and unauthorised access thereto; and (iv) prevent Personal Data breach.

(9) What Are Your Rights in Relation to Personal Data Processing?

Detailed information about the rights and exercise thereof in relation to Personal Data Processing is available above in the Representation.



Privacy Representation of Clarkson Hyde Czech Republic Applicable to Services Provided by the Clarkson Hyde Czech Republic Group as the Personal Data Processor

This representation applies to the provision of the following types of services by the Clarkson Hyde Czech Republic Group as the Personal Data Processor: *Audit, Tax, Accounting and Payroll Processing, as defined on the website of Clarkson Hyde Czech Republic, including sub-services.*

(1) What Personal Data Do Clarkson Hyde Czech Republic Process?

As a Processor, Clarkson Hyde Czech Republic process Personal Data provided to Clarkson Hyde Czech Republic by you. Personal Data can include Personal Data of your family members (e.g. your children or spouse) or representatives, if necessary due to the type of the provided services, and in addition to this, also Personal Data provided to Clarkson Hyde Czech Republic by your employer, contractual partner or a third party, unless the Personal Data were acquired illegally.

Depending on the provided service's type, Personal Data include, but are not limited to, the following information:

- First and last name, sex, date of birth, birth number, tax ID and Company ID;
- Information provided in an identity card (civil identity card, passport);
- Address of residence and/or permanent residence;
- Email address and/or contact phone number (both private and business);
- Other data for the purpose of providing a certain service type (family status, number of children, information about family members, including their first and last name and date of birth);
- Job title under the employment contract;
- Data about your profession or performance assessment;
- Data about the financial situation, including data about a bank account, income from employment or another income-generating activity and from investments; and
- Data on your relationship with Clarkson Hyde's clients based on the purchase of goods or provision of a service.

(2) For What Purposes Do Clarkson Hyde Czech Republic Process Personal Data?

Clarkson Hyde Czech Republic process Personal Data on the basis of a contract entered into for the purpose of providing services either directly to you or to Clarkson Hyde Czech Republic's clients who can include your employer or a contractual (business) partner.

Clarkson Hyde Czech Republic process Personal Data exclusively on the basis of instructions of Clarkson Hyde Czech Republic's clients (Personal Data controllers), who are responsible for (i) the provision of your Personal Data; (ii) obtaining consents with Personal Data's processing, where necessary; and (iii) informing about the exercise of rights under the GDPR Regulation. Please contact directly your employer or contractual (business) partner, if you wish to exercise:



- The right to access Personal Data, including the right to request a copy of the Personal Data, which are processed;
- The right to rectification of wrongly recorded Personal Data, including the right to updates of Personal Data;
- The right to erasure of Personal Data, if practicable in a particular case;
- The right to restriction of Personal Data Processing; and
- The right to withdraw the consent with Personal Data Processing, if Personal Data are processed on the basis of your consent.