

## Privacy Policy requestor.com s.r.o.

This Policy is effective from **1<sup>st</sup> January 2025**.

In some cases, we may obtain and process your personal data. Where this happens, the processing is governed by this policy.

This privacy policy applies to (i) the processing of your personal data when you use our website <https://www.requestor.com/>, (ii) the processing of your personal data when we communicate with you (by telephone, email, web contact form, etc. ), (iii) the processing of your personal data when we provide you with services under a contract, (iv) the processing of your personal data when we fulfil our legal obligations, (v) the processing of your personal data when we send you an offer of our services, (vi) the processing of your personal data for the purposes of protecting our legitimate interests and the legitimate interests of third parties and (vii) handling requests for content moderation and communicating with any supervisory authorities.

This document contains the following information:

1. who is responsible for processing personal data concerning you,
2. for what purpose your personal data is processed and on what legal basis,
3. what personal data we process,
4. who has access to personal data concerning you (other recipients),
5. the period for which the personal data will be stored,
6. what rights you have and other important information regarding personal data processing.

### I. Data Controller

The data controller is responsible for the processing of your personal data. The data controller is **requestor.com s.r.o.**, incorporated under the laws of the Czech Republic, business ID no. 28349121, registered office at Purkyňova 649/127, Medlánky, 612 00 Brno, the Czech Republic, registered in the Commercial Register under file No. C 62914 at the Regional Court in Brno.

You can send any question or request regarding personal data processing to the controller via its e-mail address [support@requestor.com](mailto:support@requestor.com).

### II. Purpose and Legal Basis of Processing

We process personal data concerning you for the following purposes:

- a) **contract performance and customer account management** - we process personal data for the purpose of concluding and performing our mutual contract, under which we also manage your customer account;
- b) **dealing with your requests** - we process personal data to deal with your requests, received for example via phone, e-mail or through our online contact form;

- c) **compliance with legal obligations** - we process personal data to fulfil our legal obligations under the laws governing the provision of legal services, e.g. accounting and tax or in connection with the moderation of user content;
- d) **sending marketing communications and services offers including profiling based on consent** - we only send you information if you have given us your consent and to the extent of the consent given;
- e) **sending of commercial communications relating to our own similar products or services based on legitimate interest** - we send these, if you are our customer or subscribe to our newsletter and do not opt-out;
- f) **protection of our legitimate interest or legitimate interest of third parties** - we process personal data to protect our legitimate interests, for example to protect our website and IT systems against cyber-attacks or other misuse or legitimate interests of third parties, such as interference with third party rights.

The legal basis for the processing of personal data is therefore:

1. **our mutual contract or your request** if we process the data for the purpose of (a) performance of the contract or (b) dealing with your requests and inquiries;
2. **our legal obligation** where we process the data for the purpose of (c) compliance with legal obligations imposed by law;
3. **consent** when (d) sending marketing communications and services offers including profiling based on consent to process personal data for sending marketing communications and services offers to voluntary subscribers;
4. **our legitimate interest or legitimate interest of third parties** in all other cases.

We process personal data manually and by automated means.

### III. Categories of Personal Data

The following table contains a list of personal data categories, which we might process, and the purpose for which we may process them.

Personal data	Purpose of Processing
Name and surname	Performance of contract; dealing with your requests; compliance with legal obligations; sending marketing communications and services offers; protection of our legitimate interest <b>or legitimate interest of third parties</b> .
ID, VAT ID	Performance of contract; compliance with legal obligations; protection of our legitimate interest <b>or legitimate interest of third parties</b> .
Contact address	Performance of contract; dealing with your requests; compliance with legal obligations; sending marketing communications and services offers; protection of our legitimate interest <b>or legitimate interest of third parties</b> .

E-mail address	Performance of contract; dealing with your requests; compliance with legal obligations; sending marketing communications and services offers; protection of our legitimate interest <b>or legitimate interest of third parties.</b>
Phone number	Performance of contract; dealing with your requests; compliance with legal obligations; sending marketing communications and services offers; protection of our legitimate interest <b>or legitimate interest of third parties.</b>
Bank account and other transaction details, user content	Performance of contract; compliance with legal obligations; protection of our legitimate interest <b>or legitimate interest of third parties.</b>

If you have visited our website, we may obtain and process your personal data within the framework of our cookie policy here [www.requestor.com/documents](http://www.requestor.com/documents).

#### IV. Other Personal Data Recipients

We may disclose personal data concerning you to the following categories of recipients:

1. public authorities;
2. other partners.

##### Public Authorities

We only disclose personal data concerning you to public authorities in accordance with your instructions, in cases imposed by law or in order to protect our or third parties' legitimate interest.

##### Other Partners

Our administrative documents and mail servers are stored within the Microsoft Azure and **Microsoft 365** from **Microsoft Corporation**, One Microsoft Way, Redmond, Washington 98052, USA. More information about the security of your personal data within this service are found at <https://privacy.microsoft.com/en-gb/privacystatement>.

If you are our client or if you subscribe to our newsletter, we will process your e-mail address and, in some cases, your full name in the mailing tool called Mailchimp, operated by **The Rocket Science Group LLC**. Mailchimp complies with European Union requirements for personal data processing and transfers based on standard contractual clauses at <https://mailchimp.com/legal/data-processing-addendum/>. You will find more information about the processing of personal data concerning you in the Mailchimp's Privacy Policy available at <https://www.intuit.com/privacy/statement/>.

From time to time, we may also disclose your personal data to other contractual partners where this is appropriate and proportionate to the purpose of processing. We use external collaborators for certain activities, a list of which can be found here. However, we will always have a contract with these entities to ensure that they process your personal data in the same way as Requestor.

## V. Personal Data Storage Period

We process personal data concerning you for a period determined by the purpose of their processing. The data processing period is listed below.

Processing Purpose	Storage Period
Performance of contract	For the duration of contract or until carrying out your instructions, and for the period of three years following the expiration or termination of the contract.
Fulfilling your requests	Until completing your request and for additional 3 years following its completion.
Compliance with legal obligations	As long as required by legal regulations.
Sending marketing communications and services offers based on legitimate interest	Until you refuse to receive marketing communications and service offers (opt-out).
Sending marketing communications and services offers including profiling based on consent	For the duration of your personal data processing consent.
Protection of our legitimate interest or the legitimate interest of third parties	For 3 years from the commencement of data processing, unless laws require otherwise (such as the laws on the provision of legal services), or unless it is necessary in justified cases to retain data for a longer period in connection with a particular case.

## VI. Your Rights and Other Important Information

### Right of Access to Personal Data

You have the right to obtain information as to whether personal data concerning you are being processed and, where that is the case, you also have the right to obtain access to personal data concerning you. If you have any questions or requests regarding the processing of your personal data, you can contact the controller via the email address [support@requestor.com](mailto:support@requestor.com).

### Right to Rectification of Personal Data

If you believe that we are processing personal data about you which are inaccurate or incomplete, you have the right to request their rectification and/or completion.

### Right to Erasure

If you request erasure of personal data concerning you, we shall erase the personal data provided that (i) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, (ii) you have revoked your consent with personal data processing, the personal data have been processed based on this consent and there is no other legal ground for the processing,

(iii) you object to the processing and there are no overriding legitimate grounds for the processing of the personal data, (iv) the personal data have been unlawfully processed, or (v) the legal obligation in the EU or national law to process personal data no longer applies.

### **Right to Restriction of Processing Personal Data**

Until we resolve any issues regarding the processing of personal data concerning you, you have the right to restriction of processing. Where the processing has been restricted, such personal data shall, except for storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of a third person or for reasons of important public interest of the Union or of a Member State.

### **Right to Data Portability**

You have the right to obtain personal data relating to you that (i) you have provided to us and (ii) the processing of which is based on consent or contract and (iii) which we process by automated means, in a structured, commonly used and machine-readable format, and the right to transfer that data to another controller. In the event the exercise of this right would adversely affect the rights and freedoms of others, we will, however, not be able to act on your request.

### **Right to Object**

You have the right to object to the processing of personal data for the performance of a task carried out in the public interest or in the exercise of official authority, or for protection of our legitimate interest or a legitimate interest pursued by third parties. In case that we then fail to demonstrate that compelling legitimate grounds for the processing exist which override your interests, rights and freedoms, the processing will be discontinued without undue delay.

### **Other Important Information**

We generally process your requests free of charge because it is important for us to keep you informed about the processing of your personal data. In case of repetitive or manifestly unfounded requests to exercise the above-mentioned rights, we shall be entitled to charge a reasonable fee for exercising the right, or to refuse to act on the request. In such cases we shall inform you accordingly.

If you wish to exercise any of your above-mentioned rights, please, contact us via the e-mail address *support@requestor.com*. We shall respond to your questions or requests without undue delay.

Our actions are supervised by the Personal Data Protection Office, where, in case you are dissatisfied, you may file a complaint. You can discover more information on the Office's website at <https://uouu.gov.cz/en>. If you are a foreign person, the competent authority for filing a complaint may be another administrative authority according to your place of establishment or residence.

This document has been drafted in Czech and English versions. In case of differences between the two documents, the Czech version shall prevail.