

# Information on the Processing of Personal Data of Employees, External Contractors, Customers and Business Partners of MoroSystems, s.r.o.

**MoroSystems s.r.o., Company ID No.: 277 04 424, with its registered office at Smetanova 1022/19, Veveří, 602 00 Brno (hereinafter referred to as "MoroSystems" or "we"),** as the data controller, hereby provides you, as a user of the websites [www.morosystems.cz](http://www.morosystems.cz) and [www.morosystems.com](http://www.morosystems.com), with information on the collection of personal data and the principles of privacy protection described below.

As of 25 May 2018, 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, on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) entered into force.

By providing this information, we aim to inform employees, external contractors, customers, business partners (suppliers, subcontractors), and other natural or legal persons with whom we maintain relations, even without a contractual relationship, about what personal data we collect, how we process it, from which sources we obtain it, for what purposes we use it, to whom it may be disclosed, where further information can be obtained, and what rights they have.

## Principles of Personal Data Processing

1. MoroSystems (hereinafter referred to as the "Company") processes personal data for clear and comprehensible purposes, using defined means and methods ensuring the achievement of such purposes, and retains personal data only for the period strictly necessary.
2. The Company ensures appropriate protection against unauthorized or accidental access, alteration, destruction or loss, unauthorized transfers, unauthorized processing, or misuse.
3. All data subjects are informed in a clear and comprehensive manner about the processing and their rights.
4. The Company has adopted appropriate technical and organizational measures, internal standards and procedures ensuring a level of security corresponding to anticipated risks. All persons handling personal data are bound by confidentiality.

## Administration and Processing of Personal Data

1. The data controller is MoroSystems s.r.o., Company ID No.: 277 04 424, with its registered office at Smetanova 1022/19, Veverří, 602 00 Brno, registered in the Commercial Register maintained by the Regional Court in Brno, Section C, File No. 53303 (hereinafter referred to as the "Company").
2. In certain cases, the Company also processes personal data of data subjects on behalf of another entity (another data controller). This includes, for example, cooperation with other companies within the MoroSystems Group (hereinafter referred to as the "MoroSystems Group"); a list of entities belonging to the MoroSystems Group is set out in Annex No. 1 to this document and will be updated as necessary.

## Purpose and Legal Basis for Processing

All personal data is processed in a lawful and transparent manner, and only data that is adequate, relevant, and necessary in relation to the purpose of processing is collected.

### 1. **Without the data subject's consent, for the purposes of:**

- a) prevention of damage to property of data subjects entrusted to the Company and to the Company's own property
- b) compliance with notification obligations towards public authorities
- c) compliance with obligations arising from the enforcement of decisions of courts and/or public authorities
- d) compliance with obligations imposed on the Company in direct connection with the services it is authorized to provide to business partners, in particular pursuant to Act No. 480/2004 Coll., on Certain Information Society Services, as amended and in force
- e) fulfillment of archiving obligations
- f) negotiation, establishment and performance of rights and obligations arising from concluded contracts and agreements, in particular the exercise of rights and obligations arising from ongoing or concluded employment or similar relationships with job applicants or employees, and from ongoing or concluded business relationships with potential customers or customers

Personal data is, in such cases, necessary, inter alia, to enable the negotiation, conclusion and performance of contractual relationships without disproportionate legal risks, including negotiations on their conclusion or amendment.

### g) protection of rights and legally protected interests, in particular for the purposes of:

- protecting the rights and legally protected interests of the Company, authorized recipients or other relevant persons, for example when substantiating claims which the Company is obliged to demonstrate to third parties, in the recovery of receivables, enforcement of security, or other exercise of claims, or in the development and improvement of provided services

- conducting negotiations on the transfer of rights and obligations, including related implementation and subsequent dealings with third parties
- handling all dispute agendas, in particular for the purposes of conducting judicial or other proceedings (e.g. fulfilling evidentiary obligations)

## 2. **With the data subject's consent**

a) This typically concerns situations where the data subject voluntarily consents to the Company processing personal data provided by the data subject or otherwise obtained. If the data subject does not grant such consent, the Company may not be able to provide its services, products, or programs, or may be required to reasonably adjust their availability, scope, or conditions.

On the basis of the data subject's consent, the Company processes the data subject's personal data for the following purposes:

- care of employees (including job applicants and former employees) or customers (including potential and former customers) within activities that do not constitute the performance of an employment, business or other contract and are not based on another legal ground for processing, and which include, in particular: market research, maintaining courtesy contact, relationships and communication

## **Scope and Method of Personal Data Processing**

The Company processes personal data to the extent necessary to fulfill the purposes specified above. In particular, it processes contact and identification data, data reflecting creditworthiness, reliability and payment discipline, descriptive and other data, and, to the necessary and justified extent, also data relating to other persons, typically obtained from publicly available sources. Further information on the scope of personal data processed is set out in Annex No. 2 to this document.

The methods by which the Company processes personal data include both manual and automated processing, including algorithmic processing, within the Company's information systems. Personal data is processed predominantly by the Company's employees. To the necessary extent, it is also processed by third parties entrusted with such processing on the basis of a specific written agreement concluded prior to any transfer of personal data to such third party. This agreement provides the same safeguards for the processing of personal data as those adhered to by the Company in accordance with its legal obligations.

## **Recipients of Personal Data**

Personal data of data subjects (employees, job applicants, former employees), customers (including potential and former customers), and business partners (including potential and former business partners) is disclosed, to the necessary extent, in particular to authorized employees of the Company in connection with the performance of their duties that require the handling of such personal data. Compliance with all security measures is ensured as a matter of course. In addition, personal data of data subjects is transferred to third parties that participate in the processing of such data on the basis of a specific written agreement, or is otherwise made available to them for other lawful reasons in accordance with applicable legislation.



**In accordance with applicable legal regulations, the Company is entitled or, where applicable, directly obliged, without the data subject's consent, to disclose personal data:**

- a) to competent public authorities, courts, and law enforcement authorities for the purpose of fulfilling their statutory obligations and for the enforcement of decisions
- b) to other persons to the extent stipulated by legal regulations, for example to third parties for the purpose of recovering the Company's receivables from data subjects

With the data subject's consent, on the basis of which the Company is authorized, to the relevant extent, to handle also information constituting confidential information, trade secrets, banking secrecy, and other information classified under Act No. 412/2005 Coll., on the Protection of Classified Information and Security Clearance, the Company further discloses personal data to:

- a) to entities within the MoroSystems Group and to entities economically affiliated with the Company, for the purposes of compliance with the Company's legal obligations, conclusion and performance of contracts, offering products and services, protection of the Company's rights and legally protected interests, customer care, and mutual information sharing within the MoroSystems Group regarding matters reflecting the creditworthiness and reliability of customers
- b) to entities within the group of companies economically affiliated with the Company's customer, where such arrangement is agreed in a written business contract with the customer
- c) to other entities for the purposes of dissemination of information and offering the Company's products and services; in such cases, where the data subject's consent has been granted, the Company shall carry out such transfers in full compliance with the conditions set out in this document, in particular with regard to the purposes, scope, and duration of processing. In such cases, the Company shall disclose only identification and contact data to the extent necessary for the respective recipient.

## **Transfer of Personal Data Abroad**

Personal data of data subjects is processed within the territory of the Czech Republic and other Member States of the European Union where entities belonging to the MoroSystems Group are established and apply the same standards of personal data protection as the Company. Neither the Company nor the entities involved in the processing of personal data transfer such data to countries outside the European Union.

## **Retention Period of Personal Data**

The Company processes personal data of data subjects only for the period strictly necessary with regard to the purposes of processing, unless a specific retention period is required by law. Authorized persons designated by the Company regularly assess whether the need to process certain personal data for a given purpose continues to exist. If the Company determines that such data is no longer necessary for any of the purposes for which it was processed, the data will be deleted. After the usual period of usability has elapsed, the Company carefully evaluates the necessity of further processing of the relevant personal data for the given purpose and determines the appropriate retention period based on the purpose of processing.

## **Right of the Data Subject to Withdraw Consent**

In this document, the Company explains why it requires personal data of data subjects and that, for certain purposes, it may process such data only with their consent. The data subject is not obliged to grant consent to the processing of

their personal data and is entitled to withdraw any previously granted consent at any time. If the data subject withdraws their consent, the Company shall cease processing the relevant personal data for the purposes requiring such consent; however, it may be entitled, or even obliged, to continue processing the same personal data on the basis of an appropriate legal ground for other purposes.

If the data subject does not grant or withdraws their consent, the Company may:

- a) reasonably adjust the availability, scope, or conditions of its products or services; or
- b) refuse to provide its products or services to the data subject if it determines that such consent is necessary for the provision of the product or service under the given conditions.

If the data subject wishes to withdraw their previously granted consent to the processing of personal data, they may contact MoroSystems s.r.o. in writing at Smetanova 1022/19, Veveří, 602 00 Brno, or by email at [info@morosystems.cz](mailto:info@morosystems.cz)

## Sources of Personal Data

**The Company obtains personal data of data subjects in particular from:**

- a) the data subjects themselves, either directly, for example when providing documentation for negotiations and the conclusion of contracts relating to employment relationships or provided products or services, or indirectly, for example through the use of such products or services by the data subjects or in connection with making information about products and services available to them, for example via the Company's websites
- b) publicly available sources (public registers, records, or lists)
- c) third parties authorized to handle personal data of the data subject and to transfer it to the Company upon fulfillment of specified conditions, for example members of the MoroSystems Group
- d) potential customers in the course of marketing activities and campaigns relating to the Company's services or products
- e) the Company's own activities, namely through the processing and evaluation of other personal data of the data subjects

## Your Rights Arising from the Processing of Personal Data

In relation to the processing of your personal data carried out by us, you have the following rights:

- a) the right of access to personal data;
- b) the right to rectification;
- c) the right to erasure ("right to be forgotten");
- d) the right to restriction of processing;
- e) the right to object to processing; and
- f) the right to lodge a complaint regarding the processing of personal data.

**Your rights are explained below to provide you with a clearer understanding of their scope.**



**You may exercise all your rights by contacting us at the email address [info@morosystems.cz](mailto:info@morosystems.cz)**

**You may also lodge a complaint with the supervisory authority, which is the Office for Personal Data Protection ([www.uoou.cz](http://www.uoou.cz)).**

**The right of access** means that you may at any time request confirmation from us as to whether or not personal data concerning you is being processed, and if so, for what purposes, to what extent, to whom it is disclosed, for how long it will be processed, whether you have the right to rectification, erasure, restriction of processing or to object, from which sources the personal data was obtained, and whether automated decision-making, including profiling, takes place on the basis of the processing of your personal data. You also have the right to obtain a copy of your personal data, whereby the first copy is provided free of charge; for additional copies, the Company may request a reasonable fee to cover administrative costs.

**The right to rectification** means that you may at any time request the correction or completion of your personal data if it is inaccurate or incomplete.

**The right to erasure** means that we must delete your personal data if:

- they are no longer necessary for the purposes for which they were collected or otherwise processed
- the processing is unlawful
- you object to the processing and there are no overriding legitimate grounds for the processing, or
- we are required to do so by a legal obligation

**The right to restriction of processing** means that, until any disputed issues regarding the processing of your personal data are resolved, we must restrict the processing of your personal data so that it is only stored and may, where applicable, be used solely for the establishment, exercise, or defence of legal claims.

**The right to object** means that you may object to the processing of your personal data where such processing is carried out for direct marketing purposes or on the basis of legitimate interests. If you object to processing for direct marketing purposes, your personal data will no longer be processed for such purposes.

## **Electronic Communication Means and Mobile Applications**

As part of its services and care for all data subjects, the Company develops its technologies to enable data subjects to use its products, services, and programs to an appropriate extent and in a suitable manner through modern electronic communication means. This includes, in particular, services related to the use of the internet, social networks, and various online applications. All personal data obtained in this context is processed by the Company in accordance with the terms and principles set out in this document.

For commercial communication via websites and social networks, the Company also uses cookies – small text files that are stored on the data subject's device upon the first loading of a website. Further information on the use of cookies is available on the Company's websites: [www.morosystems.cz](http://www.morosystems.cz) and [www.morosystems.com](http://www.morosystems.com)



This document becomes valid and effective as of 1 January 2026.

An integral part of this document also includes the following annexes:

Annex No. 1: MoroSystems Group

Annex No. 2: Scope of Processed Personal Data

## **ANNEX NO. 1: MOROSYSTEMS GROUP**

As of 1 January 2026, the MoroSystems Group, s.r.o. consists of the following entities:

MoroSystems, s.r.o., with its registered office at Smetanova 1022/19, Veveří, 602 00 Brno, Company ID No.: 277 04 424, registered in the Commercial Register maintained by the Regional Court in Brno, Section C, File No. 53303

MoroSystems Orchestra, s.r.o., with its registered office at Smetanova 1022/19, Veveří, 602 00 Brno, Company ID No.: 03609855, registered in the Commercial Register maintained by the Regional Court in Brno, Section C, File No. 85792

MoroSystems SK, s.r.o., with its registered office at Hraničná 18/1728, 821 05 Bratislava, Slovak Republic, Company ID No.: 47624973, registered in the Commercial Register maintained by the District Court Bratislava I, File No. 95680/B

## ANNEX NO. 2: Scope of Personal Data Processing

1. **Identification data** – includes in particular first name, surname, date and place of birth, personal identification number, permanent address, type, number and validity of an identity document; in the case of a natural person – entrepreneur, also Company ID (IČ) and VAT number (DIČ). Other possible identification data include, for example, the IP address of the device used, bank details and account number, and sets of specific authentication data agreed upon between the Company and the data subject.
2. **Contact data** – contact addresses, telephone numbers, email addresses, fax numbers, or other similar contact details.
3. **Data necessary for the conclusion of a contract** – this includes data required primarily to assess the risk associated with a contractual relationship or transaction. Depending on the type of contract, such data may include, in particular but not limited to, information on criminal record, medical fitness, enforcement proceedings, insolvency proceedings, entry into liquidation, and information on business relationships.
4. **Data arising from the performance of contractual obligations** – depending on the nature of the product or service provided, the Company processes data relating to such product or service. This category includes the processing of personal data such as, for example, the duration of the contract, payment due dates, the status of the Company's obligations towards the data subject, the status of the Company's receivables from the data subject, data on payment transactions carried out with the data subject, and data on the use of payment instruments in relation to the data subject.
5. **Personal data obtained in connection with the provision of our products or services.**