

INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA

CONTENTS

1. What is the purpose of this document?
2. Who is responsible for the processing of my personal data?
3. How can I contact the data controller?
4. What categories of personal data will be processed?
5. On what legal basis will my personal data be processed?
6. For what purpose will my personal data be processed?
7. Where will my personal data be stored?
8. Who apart from VESA EQUITY INVESTMENT will have access to my personal data?
9. Will my personal data be transferred outside Luxembourg?
10. How long will my personal data be stored by your company?
11. What are my rights in connection with the processing of my personal data?
12. How can I exercise my rights?
13. What should I do if I suspect that my personal data are processed in violation of the law, or the Data Protection Regulation?
14. Does the processing of my personal data involve automated decision-making, including profiling?

1. What is the purpose of this document?

The purpose of this document is to provide you with information about the conditions under which VESA EQUITY INVESTMENT S.à r.l, 39 Avenue John F. Kennedy, L-1855 Luxembourg, ID: B215769 (“**company**”) processes your personal data. If the memorandum uses the terms “we” or “our company”, it means the aforementioned company.

This memorandum applies to you, if you are

- a business partner of our company or a person representing a business partner
- a visitor to our company’s registered office

2. Who is responsible for the processing of my personal data?

The data controller, responsible for the proper processing of such data, is our company (see previous question).

3. How can I contact the data controller?

Our company’s contact details are as follows:

- address: 39 Avenue John F. Kennedy, L-1855 Luxembourg
- e-mail: info@veinvestment.cz
- web: vesaequityinvestment.cz

4. What categories of personal data will be processed?

The company processes the following categories of personal data:

I. DATA ON BUSINESS PARTNERS AND PERSONS REPRESENTING BUSINESS PARTNERS

- **identification details:** first name, surname, titles, date of birth, home address
- **contact details:** telephone number, email address, correspondence address
- **bank:** bank name and account number;
- **data on contractual relationship and its implementation**

II. DATA ON VISITORS TO THE COMPANY’S REGISTERED OFFICE

- **identification details:** first name, surname

5. What is the legal basis for the processing of personal data?

The company processes personal data on the following legal bases

a) compliance with its obligations stipulated by law

The company processes your personal data as it is obliged to do so by the Commercial Code as well as other laws.

b) performance of contract

The company processes your personal data for the purpose of exercising its rights and compliance with its obligations arising from contracts concluded between you and the company.

c) assurance of the company's legitimate interests

These are cases where the processing of personal data is essential to protect the interests of the controller and your interest in the protection of your personal data does not outweigh our interest in the relevant processing.

d) consent to the processing of personal data

The company currently does not process personal data on the basis of consent; however, it may do so if you grant your consent.

6. For what purpose will personal data be processed?

Your personal data will be processed for the following purposes

a) preparation of contractual documentation, changes to documentation during the contractual relationship

- The company processes the data needed for preparing or amending contractual documentation
- Legal basis for processing: performance of contract

b) exercise of rights and obligations arising from a contract

- The company processes your personal data for the purpose of its rights and obligations arising from existing contractual relations
- Legal basis for processing: performance of contract

c) credibility verification

- Access to the insolvency register, international sanction lists, etc.
- Legal basis for processing: legitimate interest, performance of contract, legal obligation

d) accounting and tax agenda, document archiving

- Legal basis for processing: compliance with obligations stipulated by law, legitimate interest

- e) **protection of the company's assets**
 - Legal basis for processing: legitimate interest
- f) **litigation agenda: determination, exercising or defence of our legal claims, including debt recovery**
 - Legal basis: performance of contract, legitimate interest
- g) **sending commercial offers**
 - We can use your contact details to send offers to extend our existing cooperation
 - Legal basis for processing: legitimate interest

7. Where are my personal data stored?

Your personal data are stored in both electronic and physical (printed) form. Documents in electronic form are stored on workstation local disks. Documents in physical form are stored in lockable cabinets, to which only authorised persons have access.

8. Who outside the company will have access to my personal data?

The personal data you have provided to us are processed and stored within the company. If personal data are processed on the basis of the legitimate interests and purposes specified above, your personal data may also be processed by the company's external co-workers and their contractual partners. We carefully select the entities that work with us on the basis of guarantees that ensure the technical and organisational protection of the personal data we pass on.

9. Will my personal data be transferred outside Luxembourg?

The free movement of personal data applies within the European Economic Area ("EEA") and the processing of such data is subject to the same rules as in Luxembourg. In certain cases it may occur that our contractual partners process personal data in third countries (i.e. countries outside the EEA), although always in compliance with all the legislative requirements. If personal data are processed in the USA, our partner there always meets all the requirements and is registered under the Privacy Shield programme. For more about the Privacy Shield programme, see: <https://www.privacyshield.gov/welcome>.

10. How long will my personal data be stored by your company?

We process your personal data solely for the duration of the contractual relationship between the partner in question and the company. After the termination of the contractual relationship we continue to store only those documents or personal data required for our legitimate interest (or for protecting our interests in the event of a dispute), for a period of 10 years from the termination of the contractual relationship with the company and/or those documents or personal data which we are obliged by law to store (i.e. for up to 30 years in certain cases).

In order to minimise data we always process only the personal data that we absolutely need for the given purpose and keep such data only for the necessary period of time. As soon as this period expires, personal data are deleted or anonymised.

11. What are my rights in connection with the processing of my personal data?

You have the right to request access to your data at any time – this means that On your request we will provide you with information on what personal data of yours we process, for what purpose, from what source those personal data were obtained, to whom your data have been provided and how long we plan to store such data.

You have the right to request that imprecise or incomplete personal data be corrected or supplemented, at any time. You also have the right to request that we delete personal data no longer needed for the purpose for which they were originally collected, or which the controller is not longer entitled to use for other reasons (e.g. such data have been processed unlawfully, the deletion of such data is required by law, etc.).

You have the right request that the processing of your personal data be restricted – this means that you may request that we not delete data of yours that we would otherwise be obliged to delete, and you can also request that we further refrain from working with your personal data until it becomes clear whether the data being processed are accurate, or whether your objection to the processing of your personal data is justified (see right to file an objection below).

You have the right to the portability of your personal data – this means that you may request that we provide you with the personal data we process in electronic form so they are easily transferrable to another controller (service provider), or to enable us to pass the data directly to another controller. This right applies solely to personal data that we have obtained in electronic form, on the basis of your consent or on the basis of a contract with you.

You have the right to file an objection at any time regarding the processing of your data for the purposes of direct marketing (sending commercial offers). If you do so, your personal data will no longer be used for that purpose. **You also have the right to file an objection against the processing of your personal data based on our legitimate interest** – in such a case we will continue to process your data only if it is proven that there are serious legitimate reasons for doing so.

If your personal data have been processed on the basis of your consent, you have the right to revoke that consent at any time. Personal data will then cease to be processed with immediate effect.

12. How can I exercise my rights?

You can exercise your rights (including the right to file an objection) with our company. You may contact us in writing or by email (our contact details are given in point 3 of this memorandum). To enable us to deal with your claim quickly and effectively, please use the form that can be found on our website at vesaequityinvestment.cz.

13. What should I do if I suspect that my personal data are processed in violation of the law, or the Data Protection Regulation?

In such a case you have the right to file a complaint with **Commission nationale pour la Protection des Données**, address: 1, avenue du Rock'n'Roll, tel.: (+352) 26 10 60 - 1, fax: (+352) 26 10 60 - 29, website: <http://www.cnpd.lu>

14. Does the processing of my personal data involve automated decision-making, including profiling

Automated decision-making means decision-making performed by a machine (computer) without human intervention, and which has legal or other similarly serious consequences for you (e.g. the failure to conclude or termination of a contract). Your personal data is not processed in the Company in this manner; the appropriate steps are always decided on by a specific company employee.