#### Signosoft App Privacy Policy

In effect from 1, 8, 2021

## 1. Who is the controller of your private data?

We at Signosoft s.r.o., Company Identification Number: 243 07 190, with a registered office at Za Poříčskou branou 4/334, 186 00, Prague 8, (hereinafter referred to as "Signosoft" or "us") operate the Signosoft Internet Application available at www.signosoft.cz (hereinafter referred to as "Application") and we provide our customers and users (hereinafter referred to as "You") with electronic document signing services (hereinafter referred to as "Services").

As a controller of private data, we determine for what purpose and by what means it will be processed, in particular how the data will be collected, recorded, sorted and possibly made accessible. We are responsible for proper execution of Your data processing.

These policies describe the processing of private data by us as the data controller. We also process for our customers as data controllers Your private data as processors, who create documents in the Application and which You sign in the Application.

For information on how Your private data is processed by our customers, please visit their websites.

#### 2. Which private data do we process?

We process the following categories of private data:

- a) identification data, mainly Your first name, last name, date of birth or Company Identification Number;
- b) contact data, mainly Your address, phone number or e-mail;
- c) Application login data, mainly Your password;
- d) payment data, mainly the number of Your bank account;
- e) data about Your device, mainly the IP address;

### 3. Why do we process private data and what entitles us to do so?

We process Your private data for the following purposes:

- a) We process Your identification data, contact data, Application login data and payment data based on the fulfillment of the contract for the provisions of Services for the purpose of establishing, maintaining and managing a user profile.
- b) Your identification data and contact data are processed based on fulfillment of the contract for the provision of Services with the purpose of service communication with You.
- c) We process your identification data and contact information based on our legitimate interests in order to prove the signature of a specific document.
- d) We process Your identification data, contact data, Application login data, payment data and data about Your device based on our legitimate interests in order to keep internal records of users and protect our rights and claims.
- e) We process Your identification data, Application contact and login details based on our legitimate interests in order to ensure the functionality, security, stability and development of the Application.
- f) We process Your identification and contact data based on our legitimate interests in order to inform about new Application functions; for this purpose, we do not process private data of individuals who do not have a user account with us.
- g) We process Your identification and contact data based on Your consent for the purpose of relaying information about third party offers; for this purpose, we do not process private data of individuals who do not have a user account with us.
- h) We process Your identification, contact and payment data based on the fulfillment of legal obligations for the purpose of fulfilling our legal obligations.

You have the right to object at any time to processing on the basis of a legitimate interest, described in more detail in the chapter "Right to portability".

You have the right to obtain from us Your private data that you have provided to us and which we process based on Your consent and the performance of the contract. We will provide your private

data in a structured, commonly used and machine-readable format. In order for us to be able to easily transfer data at your request, it can only be data that we process automatically in our electronic databases.

The right to object to the processing ".

## 4. How long will your private date be processed for?

We process your private data in full range:

- a) for the duration of the contract, based on which the Services are provided to You, in case of purposes under letter a), b) and f) above;
- b) for a period of 15 years from the provision of the Service in the case of the purpose under letter c) above;
- c) for the duration of the limitation period of claims arising from or related to the provision of the Service (typically, but not longer than 15 years from the termination of the Contract) in the case of the purpose under letter d) above;
- d) for a period of the granted consent, i.e., from the moment You give us consent, until the revocation of the consent or the termination of the contractual relationship with You in the case of the purpose under letter g) above;
- e) for a period specified by the relevant legal regulations in the case of the purpose under letter h) above;

#### 5. Use of cookies

If you visit the Application, we store on your device and subsequently read small files, so-called cookies. A cookie is a small file that we store in Your internet browser, on Your computer hard drive or on a mobile phone. Some cookies allow us to link Your activities while browsing the Application since You open a web browser window till you close it.

The moment you close the internet browser window, these cookies will be deleted. Others remain on the device for a set period of time and are activated each time You revisit the website that created the particular cookie. Not only do we store cookies on Your device, but we also read those cookies that our website has stored on Your device. To keep things simple, further in this document we will only discuss saving.

Some cookies are saved on Your device directly by our website. These cookies help us with:

- a) identifying you while navigating individual pages in the Application and during revisits;
- b) documenting Your consent in sync with this document or if You agreed to take part in a specific survey;
- c) with security arrangement, for example, to investigate whether someone has misused Your connection to the Application portal and is not pretending to be You;
- d) record, examine and eliminate errors and nonfunctioning Application components;
- e) monitor the Application traffic, its individual pages, create statistics and overview and measure the effectivity of each offer;
- f) display various variants of Můj Up portal, if we are testing new functionalities, Such cookies and other files are vital for the Application functioning. If you block these cookies in your browser, the Application might not work correctly, and we might not be able to provide You with our services in their full range.

## 6. What sources do we use for obtaining private data?

We collect private data directly from You and mainly from Your registration and Your Application and Services usage. Additional private data we collect from our activity and is mainly derived from information provided by You.

We may obtain additional private data from our customers, who may pass on your private data to us as data controllers for the purposes of using the Services.

## 7. Who processes your private data and to whom do we pass in on?

All above mentioned private data is processed by us, the data controller/administrator. This means that we determine the purposes defined above for which we collect Your private data, determine the means of processing and are responsible for its proper execution.

However, the following processors may also process private data for us:

Software provider: Google, Facebook, Instagram, Seznam.cz, LinkedIn.

- a.) Alternatively, other providers of processing software, services and applications, which are not currently used by the company.
- b) In some cases, we may be required to pass processed private data to state administration entities, courts, law enforcement authorities or supervisory authorities if requested by them.

#### 8. What are Your rights when processing private data?

Just as we have our rights and obligations when processing Your private information, you also have rights when processing Your private data.

These rights include:

#### 8.1. Withdrawal of consent

All consents we obtain are completely voluntary and You are not obliged to provide them. Failure to grant or revoke consent for the purpose of informing third party offers will not affect the processing of private data performed on other legal bases, including sending our business/marketing communications in accordance with our legitimate interest (see above for informing about new Application features).

Withdrawal of consent does not affect the lawfulness of processing prior to such withdrawal.

### 8.2. Right of access

You have the right to know what data we process about You, for what purpose, for how long, where we collect Your private data from, to whom we pass it onto, who processes it besides us and what other rights You have in regard to processing of Your private data. You found out all of this in this Privacy Policy. If you are not certain what private data, we are processing about You, you can ask us for a confirmation whether or not the private data concerning You is being processed by us, and if so, You have the right to gain access to this private data. As part of the right of access, You can request a copy of the processed private data, while we will provide You with the first copy free of charge and additional copies for a fee.

# 8.3. Right of correction

If you find out that Your private data that we process is inaccurate or incomplete, You have the right for us to correct it or add information without delay.

#### 8.4. Right of deletion

In some cases, You have the right for us to delete Your private data. In certain instances, we will delete Your private data without further delay if any of the following reasons are met:

- a) We no longer need Your private data for the original processing reasons,
- b) In case You exercise Your right to object against the processing (see below chapter "Right to portability")
- c) You have the right to obtain from us all Your private data which You have provided to us Yourself and which we process based on Your consent and based on the performance of the contract. We will provide Your private data in a structured, commonly used and machinereadable format. In order for us to be able to easily transfer data at your request, it can only be data that we process automatically in our electronic databases.
- d) The right to object to the processing and we conclude that we no longer have such legitimate interests that would justify such processing or
- e) It turns out that our processing of private data is no longer in accordance with generally binding regulations.

This right does not apply in case that processing of Your private data is still vital for:

- a) fulfillment of Your legal obligation,
- b) purposes of archiving, scientific or historic research or for statistical purposes,
- c) determination, exercise or defense of our legislative claims, or
- d) Your private data is being processed based on other legal title.

## 8.5. Right to restrict processing

In some cases, in addition to the right to deletion, You can exercise the right to restrict the processing of private data. This right allows You in specific cases to request for Your private data to be marked and that this data not be subjected to any additional processing operations - in this case not forever (as in the case of the right to deletion), but for a limited period of time. We must restrict the processing of private data if:

- a) You deny the accuracy of private data before we agree on what data is correct,
- b) We process Your private data without sufficient legal basis (e.g. beyond what we must process), but You will prefer before deleting this data only limiting it (e.g. if you expect to provide us with such data in the future anyways),
- c) We no longer need Your private data for the above-mentioned purpose of processing, but You demand it to determine, exercise or defend your legal claims, or
- d) You object to the processing. The right to object is described in greater detail below in the chapter "Right to portability".
- e) You have the right to obtain from us all Your private data which You have provided to us Yourself and which we process based on Your consent and the performance of the contract. We will provide You with Your private data in a structured, commonly used and machine-readable format. In order for us to easily transfer the data at your request, it can only be data that we process automatically in our electronic databases.
- f) "Right to object to processing". For the period during which we investigate whether Your objection is justified, we are obliged to limit the processing of Your private data.

## 8.6. Right to portability

You have the right to get all your private data which You have provided to us yourself and which we process based on Your consent and performance of the contract. We will provide Your private data in a structured, commonly used and machine-readable format. In order for us to easily transfer the requested data, it can only be data that we process automatically in our electronic databases.

## 8.7. The right to object to processing

You have the right to object to the processing of private data which occurs based on our legitimate interest. Due to this not being a marketing activity, we will stop processing Your private data unless we have legitimate reasons to continue such processing.

# 8.8. The right to file a complaint

The exercising of rights in the above manner does not affect Your right to file a complaint with the Office for Private Data Protection, in a manner described in the following chapter. You may exercise this right particularly if You believe that the processing of Your private data was unauthorized or in violation of generally binding legal regulations.

You can file a complaint against our processing of private data with the Office for Private Data Protection (Úřad pro ochranu osobních údajů), which is located at Pplk. Sochora 27, 170 00 Prague 7.

#### 8.9. How can you apply and exercise individual rights with us?

In all matters relevant to processing of Your private data, whether it is a question, exercise of a right, filing a complaint or anything else, You can contact us via e-mail: esign@signosoft.com. You can also contact us by post at: Signosoft s.r.o., Company Identification Number: 243 07 190, with office at Za Poříčskou branou 4/334, 186 00, Prague 8.

We will process your request without unnecessary delay, but within one month. In exceptional cases, especially due to the complexity of Your request, we reserve the right to extend this period by additional two months. We will inform You about such potential extension and its justification.