

GUIDELINES ON PERSONAL DATA PROCESSING OF THE SUBJECTS OF SURVEYS AND ANALYSES

Introduction

As of May 25, 2018, the regulation by the European Parliament and the Council (EU) 2016/679 from April 27, 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) (“GDPR”), which newly regulates the protection of personal data becomes effective.

Our company Engage Hill s.r.o., Ident. No.: 271 60 246, seated in Francouzská 175/14, Vinohrady, 120 00 Praha 2, Czech Republic, listed in the business register which is managed by the Municipal Court in Prague and registered under reference number C 100881, (“Engage Hill”) will act as your data controller and give your data careful consideration. The safety of your data is very important to us.

These guidelines represent an excerpt concerning the processing of personal data of subjects to our surveys and analyses. Full version of Engage Hill’s guidelines on personal data processing is available at www.engagehill.com/docs/gdprsensor

In these guidelines (“Guidelines”) you can find the summary of information regarding which personal data are being processed, for what use, to whom and for what reason they can be disclosed in addition to which rights belong to natural persons in terms of processing their personal data.

These Guidelines are effective as of May 25, 2018 and were developed in accordance with GDPR and will be updated from time to time.

Processing of personal data

Which personal data are being processed and how do we obtain them?

Engage Hill processes mainly these data:

- data about subjects of surveys and analyses provided by such subjects to Engage Hill within the surveys and analyses (e.g. age interval, gender, name of profile/team, selected colors for individual objects)

This enumeration however, does not imply that each Engage Hills’ data subject is subdued to all categories of data processing mentioned above.

Why do we process personal data?

Engage Hill uses personal data in order to offer and provide their services, improve upon them, change and develop them as well as to answer your questions, wishes or complaints.

Engage Hill also processes personal data to protect its own rights and legitimate interests, e.g. in case of settling disputes with legal action.

If you are a subject to surveys and analyses of Engage Hill your personal data is processed in terms of legitimate interest of Engage Hill towards conducting such surveys and analyses in which we identify your attitudes to terms and activities, for our customers who have commissioned such survey or

analysis and have asked you to participate in such a survey or analysis. The personal data collected by Engage Hill does not allow Engage Hill to directly identify you.

For how long do we process personal data?

Engage Hill processes personal data for a necessary period of time in order to complete the goal for which the data was collected, e.g. for a necessary period of time to provide Engage Hill services.

The period of time for data processing can also be defined by legal regulations.

Is providing us with your personal data your obligation?

If you are a subject to surveys and analyses of Engage Hill, then, in relation to Engage Hill, you are participating voluntarily and therefore you are not obligated to provide Engage Hill with your personal data.

Who has access to personal data?

The access to personal data is restricted only to employees of Engage Hill who need the data for their performance.

Can we give access to personal data to third parties?

Personal data may be provided to other, third parties of Engage Hill:

- if it is necessary in order for Engage Hill to provide their services
- if your consent is given
- if it is demanded or allowed in terms of legal regulations

Third parties which can obtain personal data in these cases are mainly processors, meaning subjects, which are assigned by Engage Hill to process personal data (e.g. external advisors etc.), providers of server, web, cloud or IT services, providers of external accounting, tax, legal services etc.

Engage Hill provides surveys and analyses to a customer who ordered them. These surveys or analyses do not contain all data which you, as subject of surveys and analysis, have provided to Engage Hill. It is however not possible to entirely exclude that in rare cases the customer may conclude how you reacted in terms of the survey or analysis, that thanks to the data available to the customer, not to Engage Hill.

Engage Hill can transfer your personal data to third countries outside of European Union. In case of transfer of data to countries outside the European Union the countries involved will be the so-called safe countries and it will happen according to an effective legislative.

Your rights in terms of processing personal data

The rights mentioned below are applicable to company Engage Hill unless mentioned otherwise.

The right of access

You have the right to access personal data and other information relating to it specified by legal regulations, mainly by Art. 15 GDPR.

The right to rectification

You have the right to have your data which is being processed by Engage Hill rectified in case it is inaccurate, or to have incomplete personal data completed.

The right to erasure

In cases stated in Art. 17 GDPR you have the right to have any personal data erased in case the company Engage Hill does not prove legitimate interests for their processing.

The right to restriction of processing

In cases stated in Art. 18 GDPR you have the right to obtain restriction on the processing of any personal data until the resolution of your incentive.

The right to data portability

In cases stated in Art. 20 GDPR you have the right to acquire any personal data which you have already provided the company Engage Hill with in a structured, commonly used and machine - readable format to transmit it to another collector.

The right to withdraw consent

You have a right to withdraw your consent in cases in which personal data are being processed based on your consent. The withdrawal of your consent does not have any influence on the processing of personal data before the withdrawal of your consent nor does it have influence on processing for other reasons.

The right to object

You have the right to object against processing of personal data based on legitimate interests and that also includes profiling. Engage Hill will not process personal data unless it can demonstrate serious legitimate reasons for processing that outweigh the interests or rights and freedoms of the data subject or for the purpose of determining, enforcing or defending legal claims.

The above-stated objections can be made against the collector, in this case Engage Hill. The right to object is stated in Art. 21 GDPR.

The right to turn to supervising agency with a complaint

You have the right to lodge a complaint with a supervisory authority in case you believe that GDPR is violated by processing personal data. The supervisory authority in the Czech Republic is the Office for Personal Data Protection (www.uoou.cz).

Contact information of the collector

In case you have any questions or want to apply your right to any of the above-stated procedures, please use the below stated contact:

Engage Hill s.r.o.
addressed to MUDr. Filip Brodan
Francouzská 175/14
120 00 Praha 2 - Vinohrady
E-mail: info@engagehill.com