

## Code of conduct for the processing of personal data

RETIA, a.s. is aware of the long-term European trend of increasing the personal data protection of individuals, with which it fully identifies within its compliance program. The RETIA strongly promotes the adherence to its security measures, adopted for the protection of personal data and ensures their permanent improving. In order to improve security measures, the RETIA group has also adopted this Code of Conduct for the processing of Personal Data:

1. **We oblige all** - This Code applies to all employees, whether in technical-economic or workers' professions, management of individual companies and groups, as well as members of corporate bodies and any other persons who cooperate with the company or a company group or perform a similar activity (thereinafter collectively all as "workers")
2. **We protect everything** - this Code applies to all personal data of natural persons treated by workers in their activities, regardless of whether there are clients, customers, suppliers, employees, business partners, related persons or other persons.
3. **We observe laws** - this Code supplements, develops, deepens and eventually specifies some statutory requirements set by both state and European institutions. RETIA continue to require all staff to comply with all legal rules, ethical standards, and moral values presented in compliance with Group Program.

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## THE BASIC PRINCIPLES OF PROTECTION OF PERSONAL DATA

1. **We are transparent** – we provide to all natural persons (hereinafter referred to as "Data Subjects) of whose data is processing by us an easy access to all information about this processing, in particular, who, what, in which extent and for what purpose is processing data, to whom it is eventually transmitted, and we also inform about related rights of Data Subjects. More information is contained both in this Code and on our website.
  
2. **We respect the law** - all data we receive from natural persons are obtained in accordance with the law, on the basis of legal titles, which are:
  - **Consent** - We always make sure that it is free, specific, informed and unambiguous,
  - **Performance or conclusion of a contract,**
  - **Compliance with legal requirements,**
  - **A legitimate interest** - In such cases, we always take care of the protection of the fundamental rights and freedoms of natural persons,
  - **Protection of vital interests,**
  - **Compliance with legal obligations** in the field of labour law, social security and social protection law, occupational medicine, health and safety at work,
  - **Determination, performance or defence of legal claims.**
  
3. **Data only effectively**-all personal data collected by RETIA and our employees is processed only with a legitimate and clearly defined purpose. If the purpose of processing personal data is over, we will take all necessary steps to dispose it off.

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4. **Extent IS important** – when processing data, we always take care to collect only that data that is necessary and only to the minimum extent. All information that is provided to us voluntarily beyond the primary purpose is processed on the basis of the accorded consent that can be revoked by the Data Subject at any time.
5. **We aim at accuracy** - we ensure that all the data we collect is always up-to-date and accurate. We monitor the accuracy of the data continuously, and in case of inaccuracies, we will immediately take all reasonable steps with the aim to change or erase the data. We store the personal data we process only for the necessary time.
6. **Security is our priority** - the protection of personal data is very important to us. We always ensure that personal information is not provided to unauthorized persons in order to avoid its damage, loss or destruction.
7. **We take care of the rights of Data Subjects** - we ensure that all legal rights of data subjects are observed within all our possibilities and capabilities, without delay and to the full satisfaction of all, but always at least as required by applicable laws. Data subjects are informed of all their rights on our website.

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## SPECIFICS OF PROTECTION OF PERSONAL DATA

Taking into account the specific activities of individual companies in RETIA group, the RETIA proclaims hereby and determines the basic rules when handling personal information for specific areas that may affect more companies in the group.

1. **Communication with business partners** – in our business activity, we ensure that every employee obtains all personal data legally and rightly, is in a position to comply with all the above principles and legal principles when dealing with the personal data of business partners - customers, suppliers and potential customers relating to the matter. Our employees adhere to legal obligations and contractual confidentiality in all specific activities related to the search and maintaining relations with business partners such as:
  - sending business messages,
  - promoting the company and public events of the company,
  - disclosure of third party information
2. **Transfer of personal data abroad** – in view of the strategy of our company to expand abroad and to support Czech and Slovak industrial production and to meet all the demanding requirements of all our customers worldwide, it is often necessary to comply by transfer of personal data outside the territory of the EU Member States with all regulations. In this case, always with the utmost care, we ensure that the personal data of our employees is always provided only on the basis of the applicable legal regulations and in such a way that all the data protection guarantees on the part of the recipients are adequately ensured. We always ensure that the personal data of all entities is protected and secured.
3. **Organizing public events** – The RETIA is making a great effort to ensure that the general public always has the opportunity to become acquainted with its functioning.

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We inform the general public of any progress, research or interest from the business circles, either by participating in fairs, educational excursions, organizing exhibitions or by familiarizing people close to our employees with their work environment. We inform the public about all of these events within our accounts on public networks or on internal and external news portals or prints. When making records of these events, we always make sure that they are made in accordance with the applicable legislation.

### WHAT WE DON'T TOLERATE

With respect to the corporate policy of the RETIA, we do not tolerate any breach of legal rules or behaviour of workers that would be unethical, immoral, unlawful, or otherwise breaching and we always proactively approach the prevention of undesirable situations. In connection with this approach within the protection of personal data, we do not tolerate the violation of personal data protection or any denial of personal data protection of Data Subjects. In particular, we completely disassociate from following violating proceeding:

1. **Automatic data collection** – We always try to make all the operations that we do in our business activity completely transparent and in order that the Data Subjects are always informed about facts related to their personal data. Therefore, we strongly oppose the collection of personal data by any unauthorized automated form in which the data subject is not informed, which data is collected about this data subject or if the data is obtained illegally – such as hacker attacks, stalking, tracking activity etc.
2. **Spyware or other attacks** – our company does not fully tolerate the use of any prohibited or harmful programs they have the aim to:
  - Take control of the data subjects' facilities, which could result in the acquisition of personal data illegally,

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- Deactivate or limit the operation of device protection, which could result in easier access to personal data,
- Uninstall or control rights and access to programs that could damage your computer or gain unauthorized access to personal data management software.

**Unauthorized data collection** – We take care not to collect or record personal data for which there is no legal basis or for which a clearly specified purpose doesn't exist. Likewise, we do not process the data longer than is strictly necessary and we always protect the data and we do not provide it to anybody other than to whom the Data Subject was informed about.

In the event that you will encounter any breach of any rule contained in this Code, or if you suspect such breach, please inform us by contacting e-mail [etika@retia.cz](mailto:etika@retia.cz). You will help us to maintain the set RETIA privacy standards.

This codex becomes effective on 1 January 2018.

Jan Volšík, MBA, Chairman of RETIA, a.s.

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