

PRINCIPLES OF PERSONAL DATA PROCESSING

Information for business partners, contact persons and visitors

Introductory information

Dear business partners and visitors,

this policy is intended to inform you how ESA s.r.o. (hereinafter the "Company") collects, processes, uses and transfers your personal data (hereinafter the "Personal Data Processing").

Personal data means information relating to a specific natural person that can be identified based on this information, possibly in conjunction with other information.

The most common examples of personal data that the Company processes in its day-to-day business are identification data (especially name and surname, position) and contact information (especially e-mail address and telephone connection) of business partners (natural persons), their employees, agents or other business partner contact persons (collectively referred to as "business partners") and visitor records of the Company's premises.

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Who is the administrator of your personal data?

The data administrator is ESA s.r.o., with its registered office at Kladno - Dubí, Oldřichova 158, Postal Code 27203, ID: 46351141, registered in the Commercial Register kept by the Municipal Court in Prague under file No. C 11538.

The Company determines how and for what purpose your personal data will be processed. Contact information can be found in the chapter "Questions and Contacts" below.

The Company and other related companies of the Hitachi Transport System Group are collectively referred to as the "Hitachi Group" in this policy.

What personal data does the Company process and for what purpose?

The table below shows what your personal data are, for what reason and for what purpose the Company processes them.

a) Business Partners

Personal Data	Purpose of processing	Legal base for processing
Identification data and contact details (especially your name,	• Negotiation and performance of the relevant contract and related business communication incl.	• Conclusion and performance of a contract,

surname, job position, company, phone, e-mail).	administration and recovery of claims, <ul style="list-style-type: none"> • sending business messages to business partners, • Addressing customers through direct marketing. 	<ul style="list-style-type: none"> • the Company's legitimate interest in ensuring communication with business partners and receivable management; • the consent of the person concerned (including by handing over the business card) or the consent given to sending commercial messages, • a legitimate interest in reaching customers through direct marketing.
<ul style="list-style-type: none"> • Payment and shipping information (e.g., account number and shipping address). 	<ul style="list-style-type: none"> • Conclusion and performance of the contract 	<ul style="list-style-type: none"> • Conclusion and performance of the contract

b) Visitors of Company premises

Personal Data	Purpose of processing	Legal base for processing
<u>Identification data</u> (especially name, surname, job position, company and purpose and time of visit)	<ul style="list-style-type: none"> • Evidence of visitors on company premises 	<ul style="list-style-type: none"> • The Company's legitimate interest in controlling entry and protecting Company property.
<u>Safety data:</u> <ul style="list-style-type: none"> • CCTV recordings. 	<ul style="list-style-type: none"> • Protection of Company assets, employees and others, • protection against theft or other crime, • control of the movement of persons within the Company's premises. 	<ul style="list-style-type: none"> • The Company's legitimate interest in ensuring control over the entry and protection of the Company's assets, employees and other persons.

What sources does the Company obtain your personal data from?

The company collects personal data, which it subsequently processes, directly from you, publicly available sources (eg. Commercial register or ARES) or your visits of the Company or within the Hitachi Group.

Do we share your personal data with others?

(a) Hitachi group companies

We only share personal information within the Hitachi Group in certain circumstances, and where such action is lawful. It is therefore possible that we will share your personal data with some Hitachi Group companies, if necessary, in the Hitachi Group business. Details of Hitachi Group members can be found at <http://www.hitachi-transportssystem.com/en/>.

Access rights between individual Hitachi companies are limited and will only be granted if the person needs to know the relevant data based on their job position or duties.

(b) Service providers

We may use external service providers to provide us with services involving the processing of your personal data, such as in the area of debt management.

External service providers will be reviewed by the Company and will provide guarantees regarding the confidentiality and privacy of business partners and visitors. The Company conclude written agreement on the processing of personal data with all of these providers, in which the providers undertake to protect personal data and adhere to the Company's privacy standards.

(c) Communication of personal data to third parties

Under certain circumstances, the Company is required to share the personal information of business partners or visitors with third parties outside of the above-mentioned service providers or companies within the Hitachi Group, in accordance with data privacy laws.

Such third parties include in particular:

- administrative and state bodies (eg. tax authorities),
- financial institutions (banks, insurance companies),
- Police, Public Prosecutor's Office,
- external consultants.

[Do we transfer personal data to countries outside the EEA?](#)

We may also transfer your personal information to countries outside the European Economic Area (EEA), for example, if it is a non-EEA Hitachi company or one of our service providers uses personnel or equipment outside the EEA.

Concerning the protection of your privacy, fundamental rights and freedoms and the exercise of your rights, we have security measures in place, in particular by ensuring an adequate level of protection based on standard EU contractual clauses based on the European Commission's model clauses. You can contact us for more information on such a transfer (see "Questions and Contacts" below).

[How are your personal data secured?](#)

The company uses modern IT security systems to ensure the confidentiality, integrity, and availability of your personal data. The Company maintains appropriate technical and organizational security measures against the unlawful or unauthorized processing of personal data and against accidental loss or damage of personal data. Access to personal data shall be granted only to persons who need it in order to fulfill their professional duties and are bound by a legal or contractual non-disclosure agreement.

[How long will we keep your personal information?](#)

The Company only keeps your personal data for as long as it is needed for the purpose for which it was collected or as long as it is required by law.

[What are your rights regarding the processing of personal data?](#)

Under legally given conditions, you may exercise each of the following rights granted to you by data protection legislation, in particular, the General Data Protection Regulation (GDPR):

- the right to access your personal data and to be provided with further information about the processing of your personal data;

- the right to correct incorrect and incomplete personal data;
- the right to retrieve your personal data and transfer it to another controller;
- the right to object to the processing of your personal data;
- the right to limit the processing of personal data;
- the right to delete personal data;
- the right to withdraw the consent to processing at any time;
- the right to file a complaint with the Supervisory Authority (Office for Personal Data Protection, www.uoou.cz).

We will respond to your requests for the exercise of rights within the legal deadline, usually within 1 month from receiving the request. If, in exceptional cases, our response requires a longer period of time, we will inform you.

Questions and contacts

If you are interested in detailed information about your privacy rights, including the right to access and correct inaccurate data, or any other question or complaint about their processing, please contact us by mail, in person, by phone or e-mail.

ESA s.r.o.

Kladno - Dubí, Oldřichova 158, PSČ 27203

e-mail: <mailto:ochranaosobnichudaju@esa-logistics.eu>

phone: +420 314 006 301

The Data Protection Officer – **Eversheds Sutherland, advokátní kancelář, s.r.o.**

Praha 8, Pobřežní 394/12, PSČ 18600

e-mail: DPO@esa-logistics.eu

phone: +420 255 706 500

Changes to this policy

The Company may decide to change or update this policy. You will always find the current version of the policy on the Company's website at <https://www.esa-logistics.com/>.