

## Terms of Personal Data Processing

### 1. INTRODUCTORY PROVISIONS

- 1.1. Tapaya s.r.o., ID No.: 234 76 541, with its registered office at Uralská 689/7, Bubeneč, 160 00 Prague 6, registered in the Commercial Register maintained by the Municipal Court in Prague, file no. C 427691 (hereinafter referred to as the "**Company**" or "**Administrator**") hereby provides information on the manner and scope of personal data processing, including rights related to personal data processing.
- 1.2. The Company, as the Administrator or processor of personal data, collects, stores, and uses (and otherwise processes) personal data in connection with its business activities (the specific purposes for which personal data is processed are defined in more detail below).
- 1.3. Privacy protection and personal data processing are priorities for the Company. Personal data processing is considered strictly confidential, and personal data is handled in accordance with applicable personal data protection legislation, in particular the General Data Protection Regulation of the European Parliament and of the Council (EU) 2016/679 of the European Parliament and of the Council 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 (hereinafter referred to as the "**GDPR**").

### 2. LEGAL BASIS AND PURPOSES OF PERSONAL DATA PROCESSING

- 2.1. The legal basis for the processing of personal data is the negotiation and performance of a contract, the fulfillment of obligations imposed on the Company by law, and the legitimate interests of the Company.
- 2.2. The company processes personal data primarily for the following purposes:
  - a) **performance of a contractual relationship** - negotiations on the conclusion, amendment, or performance of a contract. The performance of a contractual relationship primarily means the provision of services to a customer, a contractual relationship with a supplier who supplies goods or services to the Company, or another contractual relationship with a third party (hereinafter referred to as the "**Partner**");
  - b) **fulfillment of legal obligations** - obligations within the meaning of accounting and tax legislation. The fulfillment of legal obligations also means providing data and information to law enforcement authorities or other public authorities in accordance with the relevant legal regulations;
  - c) **legitimate interest of the Administrator** - protection of the rights and legally protected interests of the Administrator and interest in developing business relations with the Partner or sending commercial communications – offering services by the Company or third parties; and
  - d) **consent of the data subject** - the data subject may also grant the Company consent to process personal data. The scope of the data processed then varies depending on the purpose and extent for which the consent was granted.

### 3. PROCESSED PERSONAL DATA

3.1. The Administrator is authorized to process the following personal data according to the purpose of processing:

Personal data	Purpose of processing
Name and surname	Performance of contractual obligations, Compliance with legal obligations, Legitimate interest
Date of birth	Performance of contractual obligations, Compliance with legal obligations, Legitimate interest
Address	Performance of contractual obligations, Compliance with legal obligations, Legitimate interest, Sending commercial communications
E-mail	Performance of contractual obligations, Compliance with legal obligations, Legitimate interest, Sending commercial communications
Phone number	Performance of contractual obligations, Compliance with legal obligations, Legitimate interest, Sending commercial communications
Account number	Performance of contractual obligations, Compliance with legal obligations
ID. no, Tax reg. no.	Performance of contractual obligations, Compliance with legal obligations, Legitimate interest

### 4. RECIPIENTS OF PERSONAL DATA

4.1. Personal data is only accessible to authorized employees of the Company or individual processors of personal data of the Company, and only to the extent necessary to fulfill the individual purposes of processing, or on the basis of consent to the processing of personal data.

4.2. Personal data may be transmitted to:

- a) In cases specified by law, the Company is obliged to transfer certain personal data on the basis of applicable legal regulations, for example to law enforcement authorities or other public authorities;
- b) external accounting firms; and
- c) processors who provide server, web, cloud, or IT services to the Company and/or Partners.

### 5. PERSONAL DATA PROCESSING AND STORAGE PERIOD

5.1. The Company processes personal data for the period necessary to ensure all rights and obligations arising from the relevant contractual relationship and further for the period during which the Company, as the personal data administrator, is obliged to store personal data in accordance with generally binding legal regulations.

- a) **Performance of the contractual relationship** – for the duration of the contractual relationship and for a period of 10 years after the termination of the contractual relationship.
- b) **Compliance with legal obligations** – for the period specified by the relevant legal regulation.

- c) **Legitimate interest of the Administrator** - for a maximum period of 3 years from the date of data retention, unless specific legal regulations stipulate a longer period in certain cases, and/or if, in a justified case, there is a need to retain the data for a longer period in connection with a specific case.
- d) **Consent of the data subject** - for the duration of the consent.

## 6. PERSONAL DATA OF THIRD PARTIES

- 6.1. Personal data of third parties, meaning personal data of employees and other natural persons involved in cooperation with the Partner, or other data that the Company receives from the Partner in connection with the conclusion or performance of the contract, will be processed in accordance with applicable personal data protection laws. The Company will use this personal data for the purpose of performing the contract with the Partner. The Partner hereby acknowledges that the Company will process the personal data of third parties for the duration of the contractual relationship and further for the period specified by special legal regulations, and/or for a longer period if there is a justified need to store the data in connection with a specific case. The Partner undertakes to properly instruct its employees and other natural persons involved on the Partner's side in cooperation with the Company about the processing of personal data by the Company.

## 7. RIGHTS OF THE DATA SUBJECT

- 7.1. In connection with the processing of personal data, the data subject has rights arising from legal regulations, which they may exercise at any time. These rights include (i) the right to access personal data; (ii) the right to correct inaccurate and incomplete personal data; (iii) to erase personal data if the personal data are no longer necessary for the purposes for which they were collected or otherwise processed and/or if it is found that they have been processed unlawfully; (iv) to restrict the processing of personal data; (v) to data portability; (vi) to object, after which the processing of personal data will be terminated, unless it is proven that there are serious legitimate reasons for processing that outweigh the interests or rights and freedoms of the data subject, in particular if the reason is the possible enforcement of legal claims; and (vii) the right to contact the Office for Personal Data Protection ([www.uoou.cz](http://www.uoou.cz)).
- 7.2. Further information regarding the processing of personal data can be provided at the following email address: [info@tapaya.com](mailto:info@tapaya.com). In order to exercise their rights, partners may submit their request in writing to the Company's registered office or by email to [info@tapaya.com](mailto:info@tapaya.com). The Company reserves the right to verify the identity of the data subject exercising the above rights in an appropriate manner.

## 8. FINAL PROVISIONS

- 8.1. The Company is entitled to unilaterally amend or supplement these Terms of personal data processing at any time. In the event of any such amendment, the Company shall notify you of such changes in a timely manner and in an appropriate manner.
- 8.2. These Terms of personal data processing are valid and effective as of July 15, 2025.