

## GENERAL PRIVACY POLICY

Company **Lutech Resources Czech Republic s.r.o.**, id. no. 016 79 716, with registered office at Holandská 874/8, Štýřice, 639 00 Brno, registered in the Commercial Register at Regional Court in Brno under File No. C 79054, represented by Vlastimil Kazda, Managing Director (hereinafter as **“We”** or **“Us”**) as a controller of your personal data informs you as users of our websites **mcdermott.jobs.cz**, customers, suppliers and possible applicants about below described personal data processing and general privacy policy.

The protection of your personal data is important to us, so we will always follow these guidelines in our relationships with you. When you use our services, it is important for us that your processing of your information is perfectly understandable, transparent and you know all your rights.

If you use our services, it is important for us to ensure that the processing of your information is completely comprehensible for you and transparent, and that you know all your rights.

We explain the following in this Privacy Policy (hereinafter the **“Policy”**):

- What information we collect and how;
- How we use the collected information and on what legal basis;
- For what period of time we process the collected information;
- Who has access to the collected information;
- What rights you have in relation to the collected information and how you should exercise them.

We have tried to describe everything as clearly and simply as possible; nevertheless. In case you need to explain any part of the text, advise or discuss further processing of your personal information, you can contact us at any time at the email address **gdprbrno@mcdermott.com**. We will be happy to answer any of your questions regarding our processing of personal data.

### 1. WHAT INFORMATION WE COLLECT AND HOW WE COLLECT THEM

We collect the following information:

- **Information you provide to us.** This is your personal information you tell us when communicating with us. These are, in particular, personal data resulting from a contract for our services when you contact us (whether through a website or otherwise) and send us requests and suggestions, or when you otherwise provide or fill in certain information about yourself or when you provide us with personal data for billing purposes. This may include, in particular, these categories of personal data
  - **Identification data** – especially name, surname, address, date of birth;
  - **Contact data** – especially e-mail address, telephone number;
  - **Other data** – especially data you provide us in your CV.

- **Information we obtain when you use our services or when we use your services or products.** We collect information on how you use our services, from visiting our website to the use of our services. In addition, we process your personal information if you are subscribing to our services. In addition, we process your personal information if we use your services or products.
- **Personal data we receive when we provide our services to our customers.** In some relationships with our clients, we act as a labor agency. At other times, we act as an intermediary directly for some of our clients. In any case, we may pass on your personal data to potential prospects of you or entities to whom we will send you as part of an agency job.
- **Personal data from your CV.** If you are looking for a job with us or if you are interested in job mediation, we will process the data from your CV or we may pass it on to potential employers. We will process your CV for one year, and if you are a very promising candidate, we will delete your CV, but we will leave you with information about your name, surname, email address and job position. With your consent with processing CV, we can process your CV for as long as the consent was granted.

**Our services are not intended for children under 16 years of age. We do not process personal data of children under 16 years of age**

## **2. HOW WE USE THE COLLECTED INFORMATION AND ON WHAT LEGAL BASIS**

- **The information you provide (you communicate)** is used to enable us to provide you with our services, to contact you, to provide you with information that you have requested or which we think you might be interested in. We also use the information we collect to send you business announcements, i.e. to inform you about events, planned changes, or new services we provide.
- **Information obtained from third parties** (central evidence of execution, insolvency register) can be used to provide our services and protect our legitimate interests.
- **In case we mediate your employment opportunity or if you are interested in participating in our agency employment,** we will pass your personal data to potential prospects or employers. We will always do so on the basis of an adequate contract or other contractual terms.

**We process your personal data pursuant to this Policy on the basis of performance of a mutual agreement or your request, on the basis of our statutory obligations, on our legitimate interest or on your possible consent granted for the particular processing.** Before using the information for a purpose not listed in this Policy, we will always evaluate whether your consent is needed. In such case, we will inform you and ask for your consent.

**Our legitimate interests,** on the basis of which we process your personal data, are based on our mutual relationship. Our legitimate interests in processing your personal information are in particular:

- the possibility of contacting you a informing you regarding mutual business relationship, including a possible direct marketing;

- improving our services;
- promotion of our services;
- creating statistics based on your suggestions and questionnaires that will enable us to better customize our services to our customers;
- keeping records of your economic situation;
- efficient customer support services and
- protecting us and your legal claims.

We use your information in our internal documentation, where we keep track of where your personal data is stored, how it is secured, whether your data has been deleted, who has deleted our company and when to be able to demonstrate our compliance with legal personal data protection regulations and could fulfil other obligations under other legislation.

**You may reject processing of your personal data for the purpose of sending business communications at any time and it will not affect our other relationships. If you are not sure whether or not you have been approved to submit such communications, simply send us an e-mail with an appropriate request to [gdprbrno@mcdermott.com](mailto:gdprbrno@mcdermott.com) or to another address from which you received a commercial message from us. Revocation of consent is without prejudice to the lawfulness of processing based on consent given prior to his / her removal.**

### 3. WHO HAS ACCESS TO INFORMATION

We take care of the protection of personal data and we never sell our personal data files. We only pass the personal data to third parties for the above purposes only to the extent necessary. If we pass on your personal data to third parties, we always do so on the basis of an adequate agreement with these persons or on the basis of the general terms and conditions, so that we can control the handling of your personal data by third parties.

Your personal data will be processed by our following **processors or other subjects** in order to improve the quality of our services and ensure certain activities:

- server, web, cloud or IT services;
- state administration bodies according to our statutory duties, in particular the Financial Administration of the Czech Republic and the Czech Social Security Administration;
- McDermott Group companies;
- Oracle Corporation - Taleo and Peoplesoft work databases provider, Carerix - Carerix work database provider.

With regard to the changing providers of some service, it is not possible to list all these personal data processors, in particular.

We process your personal data only on the territory of the European Union or the European Economic Area. However, some of our partners that we pass on your personal data may be from third countries. However, we always ensure that your data is passed on to our partners in these countries in accordance with legal regulations in the field of personal data protection, so we only cooperate with partners from countries providing an adequate level of protection, based on decisions of the European Commission, partners involved in the EU - US program Privacy Shield or partners who provide other appropriate guarantees for transfer. With McDermott Group companies, we have concluded a contract that includes standardized contractual clauses approved by the European Commission.

#### **4. FOR HOW LONG WE WILL PROCESS YOUR PERSONAL DATA**

We will process your personal data only for the time necessary to meet the above-mentioned purposes for which it was collected - the provision of services, the completion of required transactions, or other essential purposes such as compliance with our legal obligations, dispute resolution and legal enforcement of our agreements. These needs may vary for different types of data in the context of different services and therefore the actual retention time may vary significantly. The criteria for determining the retention period include:

- How long is personal data needed to provide services and to ensure our company operates? This includes activities such as maintaining and improving the performance of these services, maintaining the security of our systems, and maintaining appropriate business and financial records. This is a generally valid rule, which is in most cases the basis for determining the retention time.
- Will you provide us with your data with the expectation that we will keep it until you explicitly want to delete it? If so, we will keep them for this time.
- Are these personal data sensitive? If so, it is generally advisable to use a shortened retention period.
- Have we introduced and announced a specific retention time for a particular type of data? If so, we will never go beyond it.
- Did you agree to an extension of the retention period? If so, we will keep the data in accordance with your consent.
- Do we have legal, contractual or similar obligations to store data? Examples include laws governing mandatory data retention, government regulations to store data related to the investigation or data that must be kept for the purposes of litigation.

#### **5. HOW WE SECURE PERSONAL DATA**

We are aware that ensuring security of personal data so as to prevent their misuse is our important duty towards you. That is why we strive to efficiently use the best possible security measures to prevent misuse or other unauthorised interference with your personal data. As part of our activities, we will do everything we can to prevent such a security incident, especially we will train all of our employees who come into

contact with your personal information on the subject of personal data protection, we will accept and familiarize employees with internal corporate regulations governing the protection of your personal data and we will always use only the most advanced technical solutions to ensure our processing, such as data encryption, complex passwords and the most appropriate software.

However, if, despite our best efforts, a security incident occurs and this incident could involve a high risk to your rights and freedoms, we will promptly inform you of such facts through the provided email address and publication of such information on our website, including all the necessary details.

We have adopted the following measures to secure your personal data:

- **Organisational security.** We place emphasis on securing your personal data against risks associated with the human factor, in particular:
  - We have adopted and maintain internal security policies and documents;
  - We regularly provide for training of employees and other workers on the rules of handling personal data and information security risks;
  - We stipulate in a contract the liability of employees, external contractors, suppliers and other third parties who have access to your personal data;
  - We have adopted and maintain standardised processes related to the handling of your personal data.
- **Technical measures.** We have put in place important technical measures to ensure the security of your personal data, in particular:
  - Access to systems containing personal data only under the password;
  - Regular maintenance of the devices on which the data will be stored;
  - Ensuring protection by antivirus, firewall, means to prevent unauthorized persons from accessing personal data and means of processing;
  - Means to prevent the unauthorized reading, creation, copying, transmission, modification, deletion or other processing of personal data.

## 6. WHAT RIGHTS YOU HAVE IN RELATION TO THE COLLECTED INFORMATION AND HOW YOU SHOULD EXERCISE THEM

You have the following rights in relation to our processing of your personal data:

- a) right of **access** to personal data;
- b) right to **rectification**;
- c) right to **erasure** ('right to be forgotten');
- d) right to **restriction** of data processing;

- e) right to **data portability**;
- f) right to **object to processing**; and
- g) right to **file a complaint** with respect to personal data processing.

Your rights are explained below so that you can get a better idea of their contents.

**The right of access** means that you can ask us at any time to confirm whether or not personal data concerning you are being processed and, if they are, you have the right to access the data and to information for what purposes, to what extent and to whom they are disclosed, for how long we will process them, whether you have the right to rectification, erasure, restriction of processing or to object; from which source we obtained the personal data, and whether automated decision-making, including any profiling, occurs on the basis of processing of your personal data. You also have the right to obtain a copy of your personal details, with the first provision being free of charge, and we can then request a reasonable reimbursement of administrative costs of CZK 1000.

**The right to rectification** means that you may request us at any time to rectify or supplement your personal data if they are inaccurate or incomplete.

**The right to erasure** means that we must erase your personal data if (i) they are no longer necessary for the purposes for which they were collected or otherwise processed; (ii) the processing is unlawful; (iii) you object to the processing and there exist no overriding legitimate grounds for processing; (iv) this is required of us based on a legal duty or (v) in relation to the personal data you have given consent to your processing, you will revoke your consent

**The right to restriction of processing** means that until any disputable issues concerning the processing of your personal data are resolved, we must restrict the processing of your personal data.

**The right to object** means that you may object to the processing of your personal data that we process for the basis of direct marketing or due to legitimate interest, including profiling based on our legitimate interest. If you oppose processing for direct marketing purposes, your personal data will no longer be processed for this purpose. In the case of an objection to processing based on other grounds, this objection will be evaluated and we will then inform you whether we have complied with it and that we will no longer process your data or that the objection was unwarranted and the processing will continue. Anyway, processing will be limited until the objection is resolved.

**The right to data portability** means that you have the right to obtain personal data that concern you and which are processed in an automated manner and on the basis of consent or contract, in a structured, commonly used and machine-readable format, and the right to have these personal data transferred directly to another controller.

If you have any comments or complaints about the processing or the protection of your personal data or a question about a person responsible for data protection in our company or you are claiming some of our rights, please contact our person at the email address **gdprbrno@mcdermott.com**. We will respond to your questions or comments within one month.

Our office is also supervised by the **Office for Personal Data Protection, where you can file a complaint in case of your dissatisfaction. Learn more on the Office website ([www.uoou.cz](http://www.uoou.cz))**.



#### **CHANGES TO THE POLICY**

Our Policy may be changed from time to time. We will post any changes to our Privacy Policy to **mcdermott.jobs.cz**, and if there are any major changes, we will let you know in more detail (for some services, we can make changes to the Policy by e-mail). We are archiving the previous version of this Policy for you to have access to it in the future. These versions are available on the websites listed above.

**This General Privacy Policy is effective from 25.5.2018.**