

## Privacy Policy

This Privacy Policy (hereinafter referred to as the “**Policy**”) describes how to obtain, use and further handle personal data obtained through the www.neotax.eu web interface (hereinafter referred to as the “**Web Interface**”)

### Controller of personal data:

Neotax s.r.o., with the registered office at Jemnická 1138/1, Michle, 140 00 Praha 4

Comp. Reg. No.: 02189909

Tax Id. No.: CZ02189909

Registered: in the Commercial Register of the Municipal Court in Prague, Section C, Insert 215906

### Contact details of the controller of personal data:

Mailing address: Neotax s.r.o., Jemnická 1138/1, Michle, 140 00 Praha 4

Contact e-mail: expats@neotax.eu

**Your privacy is very important to us. Please become fully familiar with this Policy which contains important information regarding the handling of your personal data and the related rights and obligations.**

## 1. INTRODUCTORY PROVISIONS

### 1.1. What do we observe when handling personal data?

We treat personal data in accordance with the laws of the Czech Republic and directly applicable European Union regulations, in particular Act No. 101/2000 Sb., on the Protection of Personal Data, as amended (hereinafter referred to as the “**ZOOÚ**”) and Act No. 480/2004 Sb., on Certain Information Society Services and on Amendments to Certain Acts, as amended, and, since its entry into force, also in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 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) (hereinafter referred to as the “**GDPR**”).

### 1.2. What are personal data?

Personal data mean any information that identifies or may identify a particular natural person. Personal data are in particular (including without limitations):

- **identification details** such as name and surname, birth registration number, date of birth, user name of the user account, gender, nationality, marital status, number of children;
- **contact details** such as permanent address (or mailing address), telephone number, email address;
- **sensitive data** such as membership in a trade union, data concerning health;

- **economic data** such as information on the financial situation, the salary, type of employment, type of pension, amount of pension, bank details, insurance, education;
- **other information** such as information collected through cookies, IP address (network identifier) including browser type, device and operating system, time and number of Web Interface visits and other similar information.

## 2. OBTAINING AND USE OF PERSONAL DATA

### 2.1. How do we obtain personal data?

- You provide us with your personal data in particular when filling in a tax return, a contact form, in e-mail communication or when creating a user account.
- When visiting and using the Web Interface, some personal data may be obtained and stored through cookies. Read more about cookies in Article 5 of this Policy and in the Cookie Policy.

### 2.2. On what basis and for what purposes do we process personal data?

- We may collect and process the personal data entered **when filling in a tax return or contact form** and provided in **e-mail communication** solely for the purpose of **negotiating a contract** or **fulfilling the contract**, i.e. for the purposes of preparing a tax return or providing tax advice. In addition, we may process these data in order to **comply with our other statutory obligations** (in particular registration duties, archiving of tax documents etc.).
- We may only collect and process the personal data entered **when creating a user account** without your explicit consent in order to allow access, management and maintenance of the user account unless stated otherwise.
- If you give us **consent** to this by confirming on the Web Interface, we may process your personal data entered when filling in a tax return questionnaire, contact form, provided in e-mail communication or when creating a user account for the purpose of sending **business communications** and **direct marketing**, or for other purposes which you have explicitly agreed with.
- We process the personal data we obtain **through cookies** based on your consent (which you may grant by Web-Interface-based confirmation after you have been notified of using cookies and have had the opportunity to learn about this Policy and the Cookie Policy). We are authorized to process your personal data obtained through cookies even if you continue to use the Web Interface even after you have been notified of the processing of these personal data. We use the personal data obtained through cookies for the purposes of **user support, the improvement of our services, including user behaviour analyses and marketing**.

**To use your personal data for any purpose other than that for which we have obtained them, we may only on the basis of your consent.**

### 2.3. How do we process your personal data obtained from a third party?

- You may also use the services offered on our Web Interface if you provide us with personal data of another person under the authorization of that person (for example,

he/she as an accountant or tax advisor may fill in the tax return questionnaire for your customer).

- If you provide us with the personal data of another person, by using the Web Interface you undertake that you are authorized to provide us with the personal data of that person. We are not responsible for any damages caused by the unauthorized provision of personal data. At the same time, you undertake to provide us with contact details of the person whose personal data you provide us. The e-mail address you provide when filling in the tax return questionnaire or the contact form is deemed such contact.
- After receiving the personal data from a third party, we will inform the person whose data were provided to us within a reasonable time of the processing of his or her personal data by sending this Privacy Policy containing all information about the processing of personal data and about the rights of the person whose personal data we process.
- All the information and rights and obligations contained in this Policy also apply to the person whose personal data we have obtained from another person.

#### **2.4. How long do we use the data?**

- The personal data entered when filling in a tax return questionnaire, the contact form and provided in e-mail communication are used only for the time necessary to fulfil the contract and comply with the statutory obligations.
- If you give us explicit consent to the processing of personal data, the data will be used for the duration of the purpose for which the consent was granted.
- The total duration of the purpose of processing of your personal data is three years, unless otherwise agreed with you or unless longer processing time is required by laws.

### **3. YOUR PERSONAL DATA RIGHTS**

#### **3.1. Right to withdraw the consent to the processing of personal data**

If we process your personal data only on the basis of your consent (i.e. without any other legal reason), you may withdraw such consent at any time.

Withdrawal of the consent to the processing of your personal data is possible at any time:

- by e-mail sent to our contact e-mail address;
- in the case of commercial communications – in the manner described in each e-mail containing a commercial communication (by clicking on the unsubscribe link or in any other way).

Withdrawal of the consent is without prejudice to the lawfulness of the data processing carried out until the withdrawal of consent to processing.

#### **3.2. Right of access to personal data**

You may request us to provide you with the information whether we process your personal data. If we process your personal data, you have the right to access these personal data and, in particular, the following information:

- purpose of processing;
- categories of processed personal data;
- recipients or categories of recipients to whom personal data will be made available;
- period for which the personal data will be stored.

At your request, we will provide you with a copy of the processed data. We may charge you an administrative fee not exceeding the costs associated with the production and delivery of the additional copies.

### **3.3. Right to rectification**

If your personal data are inaccurate or incomplete, you have the right to request immediate rectification, i.e. correcting the inaccurate data and/or completing the incomplete data.

### **3.4. Right to object to processing**

You have the right to object to the processing of your personal data at any time when processed for direct marketing purposes, including any automated processing of personal data. Once the objection has been raised, we will no longer process your personal data for these purposes.

### **3.5. The right to erasure (“the right to be forgotten”)**

If:

- the personal data are no longer needed for the purposes for which they were collected or processed;
- you have withdrawn your consent to the processing;
- you have objected to the processing of your personal data;
- the personal data have been processed unlawfully,

you have the right to require us to erase your personal data. If there are no legitimate reasons for refusing such erasure, we must comply with your request.

### **3.6. Right to restrict processing**

If:

- you deny the accuracy of your personal data;
- the processing is unlawful and instead of erasure you are requesting to restrict the processing of personal data;
- we no longer need your personal data for the processing purposes, but you require them to identify, enforce or defend legal claims;
- you object to the processing,

you may require that we restrict the processing of your personal data. When we restrict processing, we are only authorized to store your personal data; further processing is possible only with your consent or for legitimate reasons.

If the processing of personal data is limited due to an objection to the processing, the restriction lasts for the time necessary to determine whether we are obliged to comply with your objection or not.

If the processing of the personal data is restricted due to a denial of the accuracy of the data, the restriction lasts for the time to verify the accuracy of the data.

### **3.7. Right to data portability**

You have the right to obtain your personal data you have provided us in a structured, commonly used and machine-readable format and pass it on to another personal data controller.

### **3.8. How do you exercise your rights?**

You may exercise your rights in connection with the personal data through our contact information. All information and actions will be provided to you without undue delay.

We will do our best to protect your personal data. However, if you are not satisfied with the settlement, you have the right to contact the competent authorities, in particular the Office for Personal Data Protection (<http://www.uoou.cz>) which supervises the protection of personal data. This provision is without prejudice to your right to lodge a complaint with the Office for Personal Data Protection directly.

If, in particular, your permanent address, place of work or place of alleged violation of personal data protection is outside the Czech Republic in another Member State of the European Union, you may contact the competent supervisory authority in that Member State.

## **4. MANAGEMENT AND PROCESSING OF PERSONAL DATA**

### **4.1. How do we manage and process your personal data?**

We are the personal data controller within the meaning of the ZOOÚ and GDPR. Your personal data are processed by our company. Alternatively, we may assign other personal data processors. We will provide you with the information about who actually processes your personal information upon request.

Personal and other collected data are fully secured against abuse. Personal data will be processed in electronic form in an automated manner or in a printed form in a non-automated manner.

### **4.2. Who do we transfer your personal data to?**

To the extent necessary to comply with the agreement or other obligations, we may also transfer your personal data to other persons (such as other parties involved in meeting the agreement or our statutory obligations or our social networking partners, marketing, advertising and analysis).

For the “Tax Return by an Accountant” service, we will transfer the personal data you have provided to our cooperating accountant who will contact you with the offer of his/her services.

For the “Tax Consultation” service, we will transfer the personal data you have provided to our cooperating tax advisor who will contact you with the offer of his/her services.

Your personal data will not be transferred to countries outside the European Union.

## **5. COOKIES**

### **5.1. Cookies and use of Google service**

The Web Interface uses the so-called “cookies” for its activities. The Web Interface also uses Google Analytics and possibly other services provided by Google, Inc. (hereinafter referred to as “**Google**”). These services also work with information obtained through cookies.

This Policy is in force and effect from 10 July 2019.