

# Information on the Processing of Personal Data

**ANeT–Advanced Network Technology, s.r.o.**, company ID: **47916923**, with its registered office at **Královopolská 3052/139, 612 00 Brno** (hereinafter referred to as “ANeT”), hereby declares that, in accordance with Regulation (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 “Regulation”), it processes personal data of data subjects in the course of its business activities and thus acts as a data controller (also “personal data” or “PD”), i.e. a person determining the purposes and means of processing personal data. At the same time, within its operations, ANeT also acts as a data processor when processing personal data on behalf of other controllers — its clients.

As a data controller, ANeT primarily processes personal data of its employees and self-employed business partners. As a data processor, ANeT may temporarily and occasionally have access to personal data of its clients’ employees when supporting implemented ANeT identification systems.

## Processing of Personal Data as Controller

ANeT–Advanced Network Technology, s.r.o., as a personal data controller, processes data particularly in the following areas:

- Human resources administration
- Work agenda
- Accounting agenda
- Payroll and financial administration
- Business and marketing activities
- Tangible assets management
- IT administration

The lawful bases for data processing by ANeT as a controller include compliance with legal obligations, performance of a contract, legitimate interest of the controller or a third party, or consent given by the data subject. Data are processed in accordance with statutory retention periods or internally defined periods determined with due consideration, so as not to infringe data subjects’ rights.

Strict internal rules define which employee or organizational unit may access specific personal data and thus process data subjects' information. ANeT applies effective organizational and technical measures pursuant to Article 32 of the GDPR to ensure adequate data protection and regularly reviews and improves their effectiveness.

Personal data are not shared outside the company unless required by law or contract. In cases where transfer is necessary, ANeT strives to minimize it and ensures maximum protection of data subjects' rights throughout the process.

### **Data Protection Responsibility**

Following a careful assessment of the scope, nature, and types of data processing, ANeT concludes that it is not required to appoint a Data Protection Officer under the Regulation. The company cooperates with its legal counsel regarding compliance with data protection requirements. Within ANeT, the position responsible for data protection under the internal security directive is assigned to the Executive Director, currently Mr. Ales Nevesely. For any requests or questions, please contact: ANeT–Advanced Network Technology, s.r.o. Attn: Aleš Neveselý, Královopolská 3052/139, Brno, Phone: +420 513 035 537, E-mail: [ales.nevesely@anet.eu](mailto:ales.nevesely@anet.eu)

All messages, requests, and complaints will be handled directly or through authorized representatives with the utmost priority to ensure your satisfaction.

### **Processing of Personal Data as Processor**

In the implementation of its own identification systems (typically the ANeT-Time attendance system) and especially in providing contractual and non-contractual support services, ANeT acts as a processor of personal data managed by its client organizations. During system implementation or servicing, ANeT may temporarily access personal data of clients' employees contained in the respective identification system.

ANeT's proprietary identification systems operate on secure SQL databases and include robust tools based on both GDPR and general data security requirements — enabling administrators to restrict or fully block employee data access (role-based permissions, secure log-in, encryption, access logging, anonymization, time-based notifications, deletion, and irreversible data erasure).

However, configuration and use of these tools remain fully under the client's control as the data controller. For effective technical support, temporary access of ANeT personnel to client employee data may be unavoidable. Strict internal controls govern data

handling and security, and ANeT employees are trained and legally bound to maintain confidentiality and manage personal data appropriately.

ANeT has concluded data processing agreements with most of its clients, specifying security measures and data destruction according to internal regulations.

ANeT also offers a mobile attendance application for Android and iOS platforms. The app works in connection with the client's main attendance system, allowing access only upon authorization by the customer's system administrator through a secure connection. The app does not store any data locally (e.g., for offline use) — it only enables structured browsing and limited edits of data within the main system database.

### Rights of Data Subjects

To enable data subjects to exercise maximum control over their personal data, the GDPR grants several rights applicable to any data controller or processor.

If you wish to exercise any of these rights, please contact ANeT at its registered address or reach out directly to the person responsible for data protection to expedite processing of your request.

You have the right to request information at any time on whether ANeT processes your personal data. If so, you may request a copy of all data relating to you. You have the right to request correction of inaccurate data, erasure of unlawfully processed personal data ("right to be forgotten"), or file a complaint with the Office for Personal Data Protection if you deem your request has not been duly handled.

**Please note that exercising your rights will not result in any adverse treatment by ANeT. The company remains committed to lawful and fair processing of personal data and to upholding your rights. Should you have any doubts about our compliance, we encourage you to inform us so that we can address your concerns promptly.**