

## **Principles of the Processing of Personal Data by TATAA Biocenter s.r.o.**

These Principles were issued and have since been followed by the company TATAA Biocenter s.r.o., with its registered office at Nad Safinou II 366, Vestec, Postcode 252 50, Czech Republic, ID: 24219908, Tax ID: DZ24219908, registered in the Public Register administered by the Municipal Court in Prague, Section C, file reference number 189848 (hereinafter "TATAA").

Our aim is to sell goods, design and process laboratory analyses including services necessarily related thereto and provide services based on the organisation of scientific conferences, courses or similar activities, which involves the processing of personal data. TATAA will most often be in the position of personal data controller.

The shared personal data must be protected at a high level, therefore a number of security, technical and organisational measures have been adopted.

**CONTROLLER** – determines the objectives and means of the processing. For the purposes of these Principles, the Controller is TATAA.

**PROCESSOR** – performs activities of processing under a contract or other credentials of a controller.

**PARTICIPANT** – buyer, registered participant to the conference or training course organised by TATAA or a buyer of the Journal.

### **I. GENERAL INFORMATION**

**TATAA as the Controller** TATAA processes the personal data of registered Participants who have purchased a product, service or have registered to attend a TATTAA event. Defines the objectives and means of the processing.

Categories of personal data: first name, surname, e-mail, mobile phone, billing address, bank details, IP address, cookies, academic title, dietary preferences or restrictions, video and audio recording of the conference and events participants. In such case, TATAA does not process Sensitive personal data.

Data subjects voluntarily provide personal information to the Controller and, once they complete the registration for a specific event through a web form available on the Controller's website, by signing up for a newsletter or communications with support via chat or e-mail.

**Websites** The Controller processes information about when data subjects visit and browse the website of [www.tataa.com](http://www.tataa.com). This information may include IP address, operating system, ID browser, site activity and more information about interacting with our websites. We can collect this information as part of the protocol or through cookies or other tracking technologies. The principles of this personal data are provided by TATAA Biocenter AB, Gothenburg, the company that operates the website.

**Analysis and statistics** The Controller monitors the website and analyses it using analytical

services. None of the data that the Controller analyses using this service is personal data. With this service, the Controller detects the traffic and geographic data, information about the browser and operating system. All this information is used for marketing purposes, for the purpose of further improving the website and its content, as well as for legal protection or other legitimate interests.

**Social networks** TATAA has a profile on Facebook, Twitter and LinkedIn. All information, communications or materials that are provided through social media platforms are provided at own risk. TATAA cannot protect all users of social networks or even the providers of these networks. The protection of personal data is handled separately within each of the above mentioned platforms.

**Conferences** At large events such as conferences, photos and videos may be taken. In such case it is technically impossible to obtain the consent of each Participant and the Controller executes the processing based on the legitimate interest of the Controller in further promotion of their conferences. Participants are properly informed of that fact in the conference hall, as well as of the fact that they can express their disagreement.

**Book of Abstracts** At large events, such as conferences, not only are the incoming presentation abstracts and posters processed in the Book of Abstracts, but the book further includes the basic information about the registered conference participants, including their email addresses. In such case it is technically impossible to obtain the consent of each Participant and the Controller executes the processing of the Book of Abstracts based on the legitimate interest of the Controller. Participants are properly informed of that fact in advance, as well as of the fact that they can express their disagreement.

**Courses and minor events** The Controller can take pictures or videos at smaller format events where Participants may express their consent, including the proper guidance about their rights.

## II. PROCESSING PURPOSES

TATAA processes all the above information which is necessary to fulfil the following purposes:

- Organisation of scientific conferences and events for registered Participants
- Sending promotional e-mails to registered Participants to promote similar conferences organised by the Controller
- Compliance with regulatory requirements, including participation in judicial proceedings and the legal requirements of public authorities, including compliance with national security or law.

**Communication with Users** The “Log off” function is set in each marketing communication that TATAA distributes, i.e., even if it communicates with its Users. Despite the fact that the User may opt out of receipt of the TATAA newsletter, they may receive e-mails regarding accounting or necessary administration. This may include communication on the update of the Contract for the Provision of TATAA Services or this Privacy Policy. The User cannot opt out of this type of communication, since its processing is necessary for the fulfilment of the contractual obligations arising from attendance at a conference.

**Legitimate interest** As the Controller, TATAA has a legitimate interest in promoting similar services or, more precisely, events it organises. It can therefore send commercial messages to registered Participants; it processes the personal data of Participants in order to protect its legitimate business interest. Any registered user can unsubscribe from receipt of the commercial messages in

any commercial communication.

In order to protect legitimate interest in promoting similar events and conferences, video or audio recordings are taken during the events. On these records the personal data of the Participants can be processed based on the legitimate interest of the Controller in the promotion of similar events.

The Controller shall to a reasonable extent use and publish it on their website or on a special website operated for the purpose of organising a particular event, and further in their promotional activities and in the publication of information materials about the event or similar events.

Participants who do not wish to be photographed or recorded at the event can refuse permission as such prior to the beginning of the event by sending an e-mail to: [prague@tataa.com](mailto:prague@tataa.com).

**Commercial communications** TATAA can send commercial communications to the contact of its customers (Users) on the basis of a legitimate interest in promoting similar products and services through direct marketing. Only until the recipient expresses disagreement. TATAA may also send commercial communications to those who gave their consent to the processing of personal data for marketing and business purposes.

**Planned processing time** For the purposes of registering a Participant all the data categories in this document can be processed for the time necessary to organise an event, or for the time required for the fulfilment of the legal obligations and legitimate interests of TATAA, but no later than until the expiry of 10 years from the date of the event to which the Participant registered unless the Participant withdraws their content earlier.

### **III. TECHNICAL, SECURITY AND ORGANISATIONAL MEASURES**

TATAA cares for the security of personal data that is provided by data subjects. TATAA meets the stringent requirements of the GDPR Regulation and seeks to ensure that these requirements are also respected by the Participants of TATAA events.

The task of the security officers is to only design such an environment of on-line communication with Participants and other data subjects that ensures that the services provided are safe. Mechanisms for regular tests of the mechanisms and measures have been set up to control the monitoring and security of the processing. The personal data of the Participants is kept separate.

TATAA does not disclose all the details and circumstances of a technical nature through which it protects the personal data being processed. The publication of details could lead to facilitation of the path for those who could pursue breaking the systems and security barriers.

All employees who have access to Personal data are bound to secrecy and must respect the security policy. Access to all TATAA systems is personalised, protected with passwords that are formed in different ways. The systems allow electronic records so that we are able to control the access of individual employees to various databases. Electronic records are then used in retroactive analysis to detect whether an error has occurred and, if so, they help determine what kind of error has occurred and why. They may also contain information on how and by whom the given application or service has been used (for example, from what IP address the web server was accessed). Employees are trained regularly.

TATAA's offices are safe, lockable and strangers do not have access to the offices. Records kept in paper form are only maintained where absolutely necessary. In such case, TATAA keeps them locked.

#### IV. TRANSFER OF PERSONAL DATA TO THIRD PARTIES

Personal data is only provided under a processing agreement to the following subjects:

**Our processors** TATAA, as the Controller, only uses proven processors with whom it has entered into a written agreement and who provide TATAA with at least the same guarantees as TATAA does to its users.

Data processing is performed by the Controller, but the below named Processors are also authorised to process personal data for the Controller:

- a. Mailing services provider: [www.ecomail.cz](http://www.ecomail.cz), and others.
- b. The parent company of TATAA: TATAA Biocenter AB, Sweden
- c. Providers of transportation services: DHL, FEDEX, and others.
- d. Applications of the Etouches management services company.
- e. Partners of a conference or event that is organised by the Controller.
- f. Alternatively, other suppliers of processing software, services and applications: [www.multid.se](http://www.multid.se) (SW GenEx), [www.premierbiosoft.com](http://www.premierbiosoft.com) (Beacon Designer, AlleleID) and others.

**Legal obligations** Personal data may also be transferred to third parties in cases where the law requires it, or to respond to the legal requirements of public authorities, or upon request by a court in litigation.

**Joint administrators:** If the Controller provides the personal data of participants to partners of an event it organises, it is a joint controller of that personal data. Most often those are photos or videos from jointly organised events. The Participant properly notified of this fact in advance.

#### V. RIGHTS OF DATA SUBJECTS

The Controller can be asked to provide access to personal data in order to make a correction, modification or deletion of personal data where it is inaccurate or has been processed in violation of the applicable laws on the protection of personal data. This can also be done by e-mail to: [prague@TATAA.com](mailto:prague@TATAA.com), where access, processing restrictions, correction and deletion of personal data can be requested.

The Controller seeks to be able to satisfy the rights of data subjects immediately, within 30 days at the latest, in emergency situations, and then no later than within 90 days, which the applicant is notified of. However, there may be circumstances under which TATAA is not able to provide access (for example, if the desired information jeopardises the privacy of others or other legitimate rights, or where the cost of providing access would be disproportionate to the risk endangering the privacy of the individual in a particular case). TATAA shall take reasonable steps to verify your identity prior to granting access to your personal data, or making any changes.

##### 1. Right of access to personal data

According to Article 15 of the GDPR, you will have the right of access to personal data, which includes the right to obtain the following from the Controller:

- confirmation whether it processes personal data,

- information about the purposes of the processing, the categories of the personal data in question, the recipients to whom the personal data has been or will be disclosed, the planned processing time, the existence of the right to request that the Controller rectifies or erases personal data concerning the data subject, or restricts its processing, or raise an objection against such processing, the right to lodge a complaint with a supervisory authority, of any available information about the source of the personal data, unless obtained from the data subject, the fact that there is automated decision-making, including profiling, of appropriate safeguards during the transfer of data outside the EU,
- in the event that the rights and freedoms of other persons are not adversely affected, even a copy of the personal data.

In the case of repeated requests, the Controller will be entitled to charge a reasonable fee for making a copy of the personal data.

## 2. The right to rectify inaccurate data

According to Article 16 of the GDPR, the data subject has the right to have any inaccurate personal data corrected. The data subject is further obliged to notify of changes in their personal data. The data subject is also obliged to provide assistance if it is found that the personal data that TATAA processes about it is not accurate. TATAA shall make the correction without undue delay, but always with regard to the given technical possibilities.

## 3. Right of erasure

According to Article 17 of the GDPR, the data subject shall have the right to erasure of the personal data relating to it, if the Controller fails to establish the legitimate grounds for the processing of that personal data.

## 4. Right to limit processing

According to Article 18 of the GDPR, pending the resolution of a complaint, the data subject has the right to limit data processing, as long as it denies the accuracy of the personal data, the reasons of the processing, or if raises an objection against the processing of it.

## 5. The right to notification of rectification, erasure or restriction of processing

According to Article 19 of the GDPR, the data subject has the right to notification in case of rectification, erasure or restriction of the processing of personal data. If the personal data is corrected or deleted, TATAA shall inform each recipient, except where this proves impossible or involves a disproportionate effort.

## 6. Right to personal data portability

Pursuant to Article 20 of the GDPR, the data subject has the right to the portability of data that concerns it and that it provided to the Controller in a structured, conventional and machine-readable format, and to request the transfer of such data to another controller.

If, in connection with the Contract for the Provision of Services by TATAA or based on the consent, you provide your personal data and its processing is done automatically, you have the right to obtain such information from TATAA in a structured, conventional and machine-readable format. If technically feasible, the data can also be passed to a controller named by you, as long as the person acting on behalf of the competent controller is properly designated and can be authorised.

In the event that the exercise of that right might have an adverse effect to the rights and freedoms of third parties, your request cannot be satisfied.

#### 7. Right to object to the processing of personal data

Pursuant to Article 21 of the GDPR, the data subject has the right to object to the processing of their personal data on the grounds of legitimate interest.

If the Controller fails to prove that there is a serious legitimate ground for said processing, which outweighs the interests or the rights and freedoms of the data subject, the Controller shall terminate the processing based on the objection without undue delay.

If an objection is made in the case of processing related to direct marketing, then TATAA terminates the processing without undue delay.

#### 8. Right to withdraw consent to the processing of personal data

The consent to the processing of personal data for marketing and commercial purposes can be withdrawn at any time after that date. The said withdrawal needs to be made in an explicit, comprehensible and clear expression of will sent by e-mail to the address: , or to the following address: Biocenter s.r.o., Nad Safinou II 366, 252 50 Vestec, Czech Republic.

Processing of data from cookies can be avoided by setting a web browser or by settings on the TATAA website.

#### 9. Automated individual decision making, including profiling

The data subject has the right not to be subject to any decision based solely on automated processing, including profiling, which would have a legal effect on it, or affect it significantly in a similar way. TATAA, as the Controller, states to not carry out any automated decisions without the impact of human assessment with legal effects for data subjects.

**Personal data of clients** TATAA, as the processor, carries out the operations of processing for registered Users, which also includes access to the personal data of Clients. TATAA shall not share or use the personal information of Clients, except in cases that are listed in the Processing Contract between TATAA and the registered User, or in cases required by law.

In the event that the Client contacts TATAA directly with requirements regarding the exercise of the data subject's rights, it is necessary that the User is identified directly. TATAA will transfer the requirements for exercise of the data subjects' rights to the User, since the User is the Controller of the concerned personal data, so that the User is able to satisfy said requirements immediately.

## **VI. Content of sent e-mails**

Contents of commercial communications – must be clear that this is a commercial communication, the identity of the sender must be apparent and it must have a footer to facilitate unsubscribing from such receipt. At the same time it can only be addressed to those who have given their prior consent or to an existing client.

Commercial communications are to be used to communicate with existing clients, clients who wish to receive the newsletter. Conversely, it should not be used for getting new customers.

In fact, any e-mail sent via the Internet travels from one server to another. E-mail was generally not created for sending strictly confidential notifications. It is not recommended to use the services of TATAA for sending confidential information. It is not allowed to upload sensitive personal data onto the Application.

TATAA checks the content of e-mail campaigns for its Users. This procedure is beneficial to all Users who use the Application in accordance with the Contract for the Provision of TATAA Services, because they reduce the amount of spam and help to maintain the high quality and availability of TATAA services.

## **VII. Conclusion**

**Children** TATAA services are not primarily aimed at persons under 16 years of age. TATAA does not knowingly collect personally identifiable information of persons under 16 years of age.

**Changes** These principles can only be changed by written amendment about which Users will be informed via the [www.tataa.com](http://www.tataa.com) website or through the User account.

**Contact** If you have any questions regarding our Privacy Policy relating to the processing of personal data, please contact us with confidence by e-mail at [prague@tataa.com](mailto:prague@tataa.com). Or you can send a letter to the following address: TATAA Biocenter s.r.o., Nad Safinou II 366, 252 50 Vestec, Czech Republic.