

DIRECTIVE ON THE APPLICATION OF DATA PROTECTION RULES AND INFORMATION ON THE PROCESSING OF PERSONAL DATA

PREAMBLE

The undersigned Data Controller (hereinafter referred to as the "Controller"), in accordance with the applicable legislation governing the protection of personal data of individuals, in particular 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, or GDPR – hereinafter referred to as the "Regulation"), hereby issues this directive. This directive, acting as an internal regulation of the Controller, provides a comprehensive framework for the processing of personal data by the aforementioned Controller. Furthermore, this directive serves to inform data subjects about which categories of their personal data are processed, for what purpose, and what their rights are under the Regulation.

I.

Processed Personal Data, Data Subjects

This section of the directive separately regulates individual categories of data subjects, in particular:

- a) which personal data the Controller processes,
- b) from which sources they are obtained,
- c) for what purpose the personal data are processed,
- d) on the basis of which legal grounds (conditions for the lawfulness of processing) this occurs,
- e) the manner in which consent to the processing of personal data is obtained, where data are processed based on the data subject's consent,
- f) the period for which the personal data are processed,
- g) the manner in which individual groups of data subjects are informed about the principles of personal data processing and their rights.

I.1. Employees:

- a) The Controller processes only such personal data of employees as are necessary to fulfill a legal obligation (maintenance of employee and payroll records, fulfillment of obligations regarding social security, health insurance, personal income tax, and statutory liability insurance) or for the performance of a contract (in this case, the employment contract or an agreement concluded between the Controller and the employee – e.g., bank account number).
- b) Personal data of employees are obtained primarily from:
 - a. the employment contract or agreements (Agreement to Complete a Job, Agreement on Working Activity),
 - b. the personal questionnaire,
 - c. the taxpayer's declaration for personal income tax from employment.
- c) With regard to the purpose of the processing, personal data are processed without the consent of the data subject.
- d) Personal data of employees are processed for the duration of the employment relationship and for the duration of the periods stipulated by legal regulations for the archiving of documents concerning employment relationships.

- e) The processing of photographs and visual recordings of employees for purposes other than the performance of a contract or the fulfillment of a legal obligation of the Controller is possible only with the consent of the data subject.
- f) Information regarding the processing of personal data is provided to the employee upon completion of the personal questionnaire by familiarizing them with this directive.
- g) Personal data of job applicants who did not subsequently become employees of the Controller may only be processed on the basis of the data subject's consent; otherwise, they must be liquidated (destroyed) after the conclusion of the relevant recruitment process.

I.II. Business Partners (Suppliers of Goods and Services)

- a) The Controller processes only such personal data about business partners as are necessary for the performance of a contract or for negotiations regarding a contract between the Controller and these subjects. For the purposes of this directive, personal data of business partners also include the personal data of employees or representatives of such partners who are legal entities, if they are listed as employees and/or contact persons. The Controller notes that a legal entity (company, organization) as such does not have personal data.
- b) Personal data of business partners are obtained from correspondence with them, or from publicly available sources – public registers, business partners' websites, or from the concluded contract.
- c) With regard to the purpose of the processing, personal data of business partners are processed without the consent of the data subject.
- d) Personal data of business partners are processed for the duration of the contractual relationship and subsequently for the period necessary to protect the legitimate legal claims of the Controller (warranty periods, statutes of limitations for damage claims).
- e) Information regarding the processing of personal data is available to business partners on the Controller's website.
- f) The provisions of this article also apply to volunteers who perform activities for the Controller without entitlement to remuneration.

I.III. Members of the Controller – Registered Association

- a) Regarding the members of the association, the Controller processes only such data whose processing is necessary for the purposes of the legitimate interests of the Controller – the registered association, namely for
 - a. maintaining the list of association members,
 - b. recording membership fees, if they are or will be collected by the association in the future,
 - c. communicating with members, including offering activities and services of the association.
- b) Personal data of association members are obtained primarily from the membership application form, or they may be obtained by the association's bodies within the scope of its other activities.
- c) With regard to the purpose of the processing, personal data are processed without the consent of the data subject.
- d) Personal data of association members are processed for the duration of the membership in the association and subsequently for the period necessary to protect the legitimate legal claims of the Controller.

- e) The processing of photographs and visual recordings of association members for purposes other than the performance of a contract or the fulfillment of a legal obligation of the Controller is possible only with the consent of the data subject.
- f) Information regarding the processing of personal data is available to members on the Controller's website.

I.IV. Donors

- a) Article I.II. regarding the processing of personal data of business partners applies in its entirety to the processing of personal data of donors.
- b) However, the personal data of donors may be processed without their consent for an indefinite period, having regard to the provisions of Section 2072 of the Civil Code (Act No. 89/2012 Coll.) regarding the revocation of a gift due to ingratitude. Should a donor exercise this right in the future (which is not limited by a specific time period), their personal data, along with details of the accepted gift, will be necessary to process the request for the return of the gift. The processing of personal data is therefore based on the legitimate interest of the Controller.
- c) Furthermore, after the termination of the legal relationship, it is possible to process donors' personal data on the basis of the legitimate interest of the Controller. The Controller sees its legitimate interest in the right to obtain funds for its own public benefit activities using the donor database – for this purpose, the Controller may send donors information about its activities along with potential appeals for donations or other forms of support; however, this information must not constitute commercial communications.

I.V. Clients of Services Provided by the Controller:

- a) The Controller processes only such personal data of clients as are necessary for the performance of a contract concluded between the Controller and the client regarding the provision of services, or to protect the legitimate interests of the Controller in connection with the provision of services, or to fulfill a legal obligation of the Controller.
- b) Personal data of clients are obtained primarily from:
 - a. contracts
 - b. the personal questionnaire
 - c. registration forms
 - d. attendance sheets
- c) With regard to the purpose of the processing, personal data are processed without the consent of the data subject.
- d) Personal data of clients are processed for the duration of the contract and for the period necessary to protect the rights and legitimate interests of the Controller, in particular for the purpose of fulfilling obligations arising from legal regulations or the conditions of subsidy providers.
- e) Information regarding the processing of personal data is provided to clients by familiarizing them with this directive and also in a separate document: "Information on the Processing of Personal Data."
- f) Personal data of applicants for a service who, for capacity or other reasons, did not become clients of the Controller, may only be processed on the basis of the data subject's consent.
- g) The processing of photographs and visual recordings of clients for purposes other than the performance of a contract or the fulfillment of a legal obligation of the Controller is possible only with the consent of the data subject..

I.VI. Subscribers to Information Materials and Services:

- a) The Controller processes the necessary personal data of persons who are subscribers to its information materials and services (newsletters and others).
- b) Personal data of subscribers to information materials and services are obtained primarily from registration forms on the Controller's website or social media, or during events organized by the Controller.
- c) Personal data are processed on the basis of the data subject's consent.
- d) Personal data of subscribers to information materials and services are processed until the withdrawal of consent to processing – unsubscribing from the last of the subscribed information materials and services is also considered a withdrawal of consent.
- e) Information regarding the processing of personal data is provided to subscribers to information materials and services by familiarizing them with this directive and also in a separate document: "Information on the Processing of Personal Data."

II.

Rights of Data Subjects

The Controller hereby informs data subjects that the Regulation grants them, in particular, the following rights:

- a) to withdraw consent to the processing of personal data at any time,
- b) to request information from the Controller regarding which personal data are being processed,
- c) to request an explanation regarding the processing of personal data,
- d) to request access to such data and have them updated or rectified,
- e) to request the erasure of their personal data from the Controller,
- f) in case of doubt regarding compliance with obligations related to the processing of personal data, to contact the Controller or the Office for Personal Data Protection.

The data subject shall exercise the aforementioned rights with the Controller. Contact details are provided in Article III of this directive.

III.

System of Personal Data Processing, Security, Processors, Liability, and Communication

This section of the directive regulates:

- a) the manner in which personal data are processed and where they are stored,
- b) which other persons (third parties) process personal data on behalf of the Controller,
- c) the security measures applied to personal data,
- d) who is liable for the processing and security of personal data,
- e) the manner in which the Controller communicates with data subjects.

III. I. Personal Data Processing System

Personal data are generally processed in electronic form, primarily using:

- a) Microsoft Excel spreadsheet software
- b) accounting software
- c) other programs and applications.

Personal data may be stored:

- a) on the local network of the Controller or the Processor
- a) on remote third-party servers (the cloud). The cloud service provider is not considered a processor of personal data, as they do not perform any operations with this data and merely provide storage space.

Personal data processed in physical (paper) form are processed by the Controller's employees at its offices, or by the Processor's employees at their offices.

III. II. Personal Data Processors

On the basis of a contract, the following other persons (processors) may process personal data for the Controller:

- a) an external payroll accountant
- b) an external financial accountant
- c) a provider of marketing and advertising services, including services used for bulk email distribution

The Controller shall provide a list of specific processors to the data subject upon request.

III. III. Personal Data Security:

Personal data stored on the Controller's local network are secured by standard means of the server operating system or the operating systems of connected workstations (username, password), a firewall, and antivirus software on all stations. Users are instructed on security principles regarding the use of computer technology.

Personal data stored in the accounting software are secured by the security features of that specific program.

Personal data processed in physical (paper) form are stored in the Controller's offices. The offices are secured by locks and are located in a building with a 24/7 reception.

The security of personal data stored with processors is ensured by the respective processors.

III. IV. Responsible Persons:

The Controller designates the following senior employee/member of a governing body to coordinate all processes affecting the processing of personal data within the Controller's organization: the Co-Director of the Controller.

The person responsible for the technical security of personal data is: the Co-Director of the Controller.

The person responsible for communication with data subjects is: Communications Manager.

III. V. Communication with Data Subjects:

The Controller shall publish all Information on the Processing of Personal Data, including this directive, on its website: www.migact.net. If the Controller operates publicly accessible internet applications that involve the collection of personal data, information regarding the processing of personal data (or links to such information) shall also be published on the websites of these applications.

Direct communication with the Controller for data subjects exercising their rights is possible at the Controller's registered office during opening hours, as well as via the following contact addresses and telephone numbers:

tel. +420 774 324 035

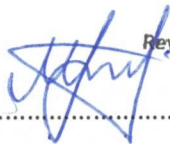
e-mail: contact@migact.net

IV.

Final Provisions

This directive enters into force and takes effect on the date of its issuance.

In Prague, on 2.4. 2026



MigAct z.s.
Revoluční 762/13, Praha, 110 00
IČO: 19843631

.....www.migact.net.....

On behalf of the Data Controller
MigAct, z.s., IČ: 19843631
with its registered office at Revoluční 13,
110 00 Prague 1, Czech Republic