



Trelleborg Bohemia, a.s.

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WEBSITE AND E-MAIL PRIVACY NOTICE – MITAS

1. Introduction

When visiting our website, MITAS a.s., Švehlova 1900/3, Záběhllice, 106 00 Praha 10, Czech Republic ("**Mitas**", "**we**", "**us**") may collect and process personal data ("**Personal Data**") about you.

This privacy notice ("**Privacy Notice**") sets out which Personal Data that we collect on our websites and for which purposes the Personal Data are processed.

Throughout this Privacy Notice the term "**processing**" is used to cover all activities involving your Personal data, including collecting, handling, storing, sharing, accessing, using, transferring and disposing of information.

"**Applicable Data Privacy Laws**" means all legislation and regulations, including regulations issued by relevant supervisory authorities, protecting the fundamental rights and freedoms of individuals and, in particular, their right to privacy with respect to the processing of Personal Data that from time to time apply to Mitas, including without limitation data protection laws and regulations implementing the Data Protection Directive 95/46/EC and as of 25 May 2018 the 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) (the "**GDPR**").

"**Personal Data**" is defined as any information relating to an identified or identifiable natural person.

2. Cookies – why do we collect and process your Personal Data

Mitas uses cookies and other similar techniques to collect information about you and your device (such as phone or computer) when you visit our website. For more information regarding Mitas's use of cookies and a description of the current purposes your Personal Data may be used for, please view our [Cookie Policy](#) The purposes for which we use cookies include:

2.1. *Personalize our interactions with you - offering relevant products and services*

When you visit our websites, landing pages and submit forms on those websites we may collect and process your Personal Data in order to better understand you as a customer and to personalize our interactions with you, for example to show you products and services we think you may like. We look at your use of the website, for example where you have clicked, your visit frequency, time spent per visit etc.

Personal Data processed for these purposes include:

- IP-address
- Device id
- Country or region
- Post / zip code
- Email address
- First name
- Last name
- Company/organization name

Job role

Phone number

Business sectors

Areas of interest

Mitas-tyres.com activities such as Document downloads, Video views, contact form submissions, page views, visit frequency etc

Original source ("referral") before visiting Mitas-tyres.com, such as which email link, website, social media post, advertisement clicks, etc that led your visit to our website.

The legal basis for the above processing of your Personal Data is that the processing is necessary in order to fulfil our legitimate interest to better understand you as a customer and to personalize our interactions with you to show you relevant products and services, article 6.1 f) GDPR.

2.2. *Identify potential customers and business opportunities*

When you visit our websites, landing pages and submit forms on those websites we may collect and process your Personal Data in order to identify if you could be a potential customer or business opportunity. We look at your use of the website, for example where you have clicked, your visit frequency, time spent per visit etc.

Personal Data processed for these purposes include:

IP-address

Device id

Country or region

Post / zip code

Email address

First name

Last name

Company/organization name

Job role

Phone number

Business sectors

Areas of interest

Mitas-tyres.com activities such as Document downloads, Video views, contact form submissions, page views, visit frequency etc

Original source ("referral") before visiting Mitas-tyres.com, such as which email link, website, social media post, advertisement clicks, etc that led your visit to our website.

The legal basis for the above processing of your Personal Data is that the processing is necessary in order to fulfil our legitimate interest to identify potential customers and business opportunities, article 6.1 f) GDPR.

2.3. *Identify usage trends and compile statistics*

When you visit our websites, landing pages and submit forms on those websites we may collect and process anonymized Personal Data in order to identify usage trends and for statistical purposes. We look at from which geographic regions our users are, such as country and language settings.

The legal basis for the above processing of your Personal Data is that the processing is necessary in

order to fulfil our legitimate interest to identify usage trends and to compile statistics, article 6.1 f) GDPR.

3. Why do we collect and process your personal data

3.1. Provide you with information such as Newsletters, Catalogues and Press Releases

If you sign up to subscribe to newsletters, catalogues, press releases and similar information about Mitas and its business or order such information on a one time basis we process your Personal Data for the purposes of providing you with the requested subscription or information.

Personal Data processed for these purposes include:

First name

Last name

Email address

Phone number

Company/organization

Areas of interest

The legal basis for the above processing of your Personal Data is that the processing is necessary in order to fulfil our legitimate interest to provide you with the subscription and information you have requested, article 6.1 f) GDPR. If you do not provide information marked with * on the website form we will not be in a position to provide you with the requested service.

3.2. Answer your Questions and handle Feedback in general

Most of our websites provide functionality for the visitor to communicate with us to ask questions and give feedback regarding our services and business. Where you use such functionality, Mitas will process your Personal Data for the purposes of answering your questions and handle feedback from you.

Personal Data processed for these purposes include:

First name

Last name

Email address

Address

Phone number

Feedback and comments made by you

Website source

The legal basis for the above processing of your Personal Data is that the processing is necessary in order to fulfil our legitimate interest to answer questions and handle feedback from you, article 6.1 f) GDPR. If you do not provide information marked with * on the website form we will not be in a position to provide you with the requested service.

3.3. Handle communications and orders or complaints sent by you through e-mail, fax and similar

If you send an e-mail or facsimile to one of our employees we will process your Personal Data provided to handle your request or order.

Personal Data processed for these purposes include:

- First name
- Last name
- Email address
- Address
- Phone number
- Other Personal Data provided by you

The legal basis for the above processing of your Personal Data is that the processing is necessary in order to fulfil our legitimate interest to answer requests and handle orders or complaints from you, article 6.1 f) GDPR.

3.4. *Create personal Website User Accounts*

Some of Mitas's websites allow users to set up a personal user account with log-in. For those websites and if you create a user account Mitas will process your personal data for the purposes of creating and managing your personal user account, create your log-in, provide you with access to your account and manage your subscriptions and/or requests.

Personal Data processed for these purposes include:

- First name
- Last name
- Email address
- Customer number
- Phone number
- Your subscriptions and/or requests

The legal basis for the above processing of your Personal Data is that the processing is necessary in order to fulfil our legitimate interest to create and manage your user account and fulfil the user account agreement with you, articles 6.1 b) and f) GDPR. If you do not provide information marked with * on the website form we will not be in a position to provide you with the requested service.

3.5. *Manage complaints relating to our services and products*

Some of our websites allow you to provide us with complaints relating to our services and products. Where you provide us with a complaint, Mitas will process your Personal Data for the purposes of investigating, managing and replying to your complaint.

Personal Data processed for these purposes include:

- First name
- Last name
- Email address
- Phone number
- Customer reference number
- Company/organization

Complaints and comments by you

The legal basis for the above processing of your Personal Data is that the processing is necessary in order to fulfil our legitimate interest of investigating, managing and replying to your complaint, article 6.1 f) GDPR. If you do not provide information marked with * on the website form we will not be in a position to provide you with the requested service.

3.6. *Manage your request for a quotation or order relating to our products and services*

Some of our websites allow you to request a quotation or order products and services provided by Mitas. Where you provide us with a request for a quotation or an order, Mitas will process your Personal Data for the purposes of managing the request or order.

Personal Data processed for these purposes include:

First name
Last name
Email address
Address
Phone number
Company/organization
Organization number
Invoice address
Customer number

The legal basis for the above processing of your Personal Data is that the processing is necessary in order to fulfil our legitimate interest of managing your order, article 6.1 f) GDPR. If you do not provide information marked with * on the website form we will not be in a position to provide you with the requested service.

3.7. *Comply with legal obligations*

Mitas processes Personal Data in order to comply with legal obligations, such as book-keeping and tax purposes.

Personal Data processed for these purposes include:

First name
Last name
Transaction data
Other information as necessary for the purpose

The legal basis for the above processing of your Personal Data is that the processing is necessary for Mitas's compliance with legal obligations, article 6.1 c) GDPR.

3.8. *Establish, exercise and defend legal claims*

Mitas may process your Personal Data for the purposes of establishing, exercising and defending legal claims in the unlikely event of a dispute.

Personal Data processed for these purposes include:



First name
Last name
Transaction data
Other information as necessary for the purpose

The legal basis for the above processing of your Personal Data is that the processing is necessary in order to fulfill our legitimate interest to establish, exercise and defend legal claims, article 6.1 f) GDPR.

4. For how long do we keep your personal data

Mitas will retain Personal Data for the period necessary to fulfill the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by local law to which Mitas is subject. We are using the following criteria to establish our retention period: (i) as long as we have an ongoing relationship with you (either as an individual or in your capacity as employed by one of our corporate customers, suppliers or co-operations partners or media, or as an investor/owner, board member or analyst); (ii) as required by legal obligations to which Mitas is subject (such as tax and accounting obligations); and (iii) as advisable in light of our legal position (such as applicable statutes of limitations).

5. Disclosure and transfer of Personal data

Group companies

Mitas, part of Trelleborg group, may disclose Personal Data processed to other companies within the Trelleborg group. Mitas has made sure to apply appropriate safeguards to your Personal Data in case of any such transfer of your Personal Data within the Trelleborg Group by entering into an Intra-Group Data Transfer Agreement, implementing the European Commission Standard Contractual Clauses to any such transfer.

Other recipients

Courts and outside counsels: Purpose of transfer: In order to exercise, establish or defend legal claims. Legal basis: To fulfill ours and yours legitimate interest to have disputes settled by competent courts.

Supplier and Partners. The purpose of transfer is to execute contracts with them that support and are related to our business and way to do business. Legal basis: to fulfill our legitimate interest to proper execute the contracts and run our business activities.

Data processors acting on behalf of Mitas

Moreover, Mitas may disclose Personal data to external parties, such as vendors and service providers processing Personal data under the instructions of Mitas. Where such disclosure entails transfers of Personal data outside the EU/EEA, Mitas will ensure that European Commission Standard Contractual Clauses have been entered into between the transferring Mitas entity and the receiving external party. Alternatively, other safe guards will be put in place prior to such transfers.

6. Security

- 6.1. We will ensure that the access to your Personal Data is accurately secured by applying appropriate safeguards, depending on the circumstances taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk. In support of this commitment, we have implemented appropriate technical, physical and organizational measures to protect your Personal Data against: unauthorized or accidental destruction, alteration or disclosure; misuse; damage; theft or accidental loss; or unauthorized access.

7. Your rights

7.1. *Right of rectification*

Mitas will take steps in accordance with Applicable Data Privacy Laws to keep your Personal Data accurate, complete and up-to-date. If you identify that any Personal Data related to you is inadequate, incomplete or incorrect, you are entitled to have the Personal Data corrected.

Moreover, you also have the right to request access to the Personal Data that we process about you.

7.2. *Further rights as of 25th May 2018*

As of 25th May 2018, you may under Applicable Data Privacy Laws also in addition to rectification be entitled to:

(i) **Access**

You may request confirmation whether or not Personal Data is processed and if that is the case access to your Personal Data and additional information such as the purposes of the processing. You are also entitled to receive a copy of the Personal Data undergoing processing. If the request is made by electronic means the information will be provided in a commonly used electronic format if you do not request otherwise.

(ii) **Object to certain processing**

You may object to processing of your Personal Data processed on the basis of a legitimate interest, on grounds relating to your particular situation and to processing for direct marketing purposes. If you have opted to receive a subscription by email each email will include an easy accessible opt-out function where you may de-register from further communication.

(iii) **Erasure**

You may have your Personal Data erased under certain circumstances such as when your Personal Data it is no longer needed for the purposes for which it was collected.

(iv) **Restriction of processing**

You may ask us to restrict the processing of your Personal Data to only comprise storage of your Personal Data under certain circumstances such as for example when the processing is unlawful, but you do not want your Personal Data erased.

(v) **Withdrawal of consent**

You have the right to at any time withdraw your consent to processing of Personal Data to the extent the processing is based on your consent.

(vi) **Data Portability**

You may ask to receive a machine-readable copy of the Personal Data processed on the basis of your consent or on the basis that the processing is necessary in order to perform an agreement with you, and which Personal Data have been provided to Mitas by you (data portability) and ask for the information to be transferred to another data controller (where possible).

7.3. *Complaints to the supervisory authority*

You acknowledge that you always have the right to lodge complaints pertaining to the processing of your Personal Data to the competent data protection authority if so provided under Applicable Data Privacy Laws. The data protection authority can be reached here http://www.garanteprivacy.it/home_en and Swedish Datainspektionen: <https://www.datainspektionen.se/in-english/contact-us/>.

8. Contact information

If you have any questions or concerns regarding the processing of your Personal data or wish to exercise any of your rights, or obtain a copy of the safeguard mechanisms put in place to protect your Personal Data in case of any transfer, please contact Mitas on the contact details set forth below.

The data controller for Personal data is MITAS a.s., Švehlova 1900/3, Záběhllice, 106 00 Praha 10, Czech Republic, business@mitas-tyres.com