

PERSONAL DATA PROCESSING POLICY at QED GROUP a.s.

QED GROUP a.s., ID No.: 247 35 884, with its registered office at Prague 1, Štěpánská 1677/20, Zip Code 110 00, Czech Republic, registered in the Commercial Register maintained by the Municipal Court in Prague, File No. B 16485 (hereinafter "**QED GROUP**"), hereby issues the following Personal Data Processing Policy (hereinafter **the "Policy"**) as of **April 9, 2026**, in its capacity as the data controller:

1. Introduction

In this Policy, QED GROUP provides information on how it collects, uses, stores, discloses, and otherwise processes personal data, and further provides information on individuals' rights regarding the protection of personal data.

2. Data Subjects

This Policy describes how QED GROUP, in its capacity as a data controller, handles the personal data of data subjects, which includes, in particular:

- 2.1st Individuals who use the websites, applications, and other online services provided and/or managed by QED GROUP;
- 2.2nd Individuals who work or have worked with QED GROUP, i.e., employees, partners, distributors, suppliers, consultants, and professional advisors, as well as job applicants;
- 2.3rd Clients, i.e., individuals who use the services provided by QED GROUP;
- 2.4th Any other persons whose personal data is processed by QED GROUP in the course of providing its services (hereinafter collectively referred to as "**Data Subjects**").

3. Personal Data

In this Policy, personal data refers to any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, or an online identifier. Personal data also relates to one or more factors specific to an individual's physical, physiological, genetic, mental, economic, cultural, or social identity. In the context of entering into and fulfilling contracts and in the course of providing its services, QED GROUP may process, in particular, the following categories of personal data:

- 3.1st identification data, including first name, last name, and gender;
- 3.2nd contact data including residential address, email address, mailing address, and phone number;
- 3.3rd financial data, including bank account, tax information (including personal identifiers), credit card information, and transaction history;
- 3.4th other data provided by Data Subjects, including special categories of personal data (in particular, year of birth, country, ethnic origin, native language, highest level of education attained, length of experience, job title, type of employment, field of work, work experience, and details regarding employment, job duties, and activities);
- 3.5th data that Data Subjects provide in a contract, questionnaire, form, etc., from which one can infer, for example, their motivations, talents, skills, competencies, interests, and behavior in the workplace;
- 3.6th data on evaluations and other results arising from services provided by QED GROUP;
- 3.7th records of email or other communications;
- 3.8th technical data and usage data necessary for the provision of QED GROUP's online services (e.g., browser type and version, language preferences, operating system and platform, source address from which the page request originates, Internet Protocol (IP) address, domain name, date and time of the page request, and other parameters in the URL).

4. Purposes of Processing

QED GROUP may process personal data for the following purposes:

- 4.1st performance of contracts and the related provision of services and their invoicing, pursuant to Article 6(1)(b) of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as **the "GDPR"**);
- 4.2nd the provision of ordered services consisting primarily of psychodiagnostics performed based on data provided by Data Subjects, the preparation of reports, and the archiving of reports;
- 4.3rd compliance with QED GROUP's legal obligations established by generally binding legal regulations, pursuant to Article 6(1)(c) of the GDPR;
- 4.4th research purposes, in particular the creation of analyses for the purpose of evaluating the services provided;
- 4.5th Sending commercial communications pursuant to Article 6(1)(f) of the GDPR on the grounds of a legitimate interest consisting of direct marketing.

QED GROUP is authorized to process personal data in accordance with legal regulations without the consent of the Data Subjects only in cases of legitimate interests and in cases where processing is necessary to comply with a legal obligation or to perform a contract.

5. Processing Period

Personal data is processed only for as long as necessary in light of the purpose of its processing. Unless the processing period is specified by law, then QED GROUP processes personal data for the entire duration of service provision until the obligations arising from related contracts expire, extended by the time necessary with regard to any audits and the exercise of rights before general courts, and in the case of promotional communications, until the Data Subject revokes their consent to such processing.

6. Rights of Data Subjects:

Data Subjects have the following rights in relation to the processing of personal data:

- 6.1st **The right to be informed** in a clear and comprehensible manner about QED GROUP's handling of the Data Subject's personal data;
- 6.2nd **The right of access**, i.e., the right to request free access to their personal data, the right to obtain a copy of their personal data free of charge, and other supplementary information;
- 6.3rd **The right to rectification of** inaccurate personal data;
- 6.4th **The right to erasure** of personal data ("right to be forgotten"), i.e., in particular, the right to request the erasure of personal data processed by QED GROUP if the grounds and purpose of processing no longer apply, or if the Data Subject withdraws consent or objects to the processing of personal data, or if QED GROUP processed personal data in violation of legal regulations;
- 6.5th **The right to restriction of processing**, i.e., the right to request the restriction of the processing of your personal data;
- 6.6th **The right to data portability**, i.e., the right to receive personal data in a structured, commonly used, and machine-readable format, and the right to request that such data be transmitted directly to another controller;
- 6.7th **The right to object** to the processing of personal data **at any time**;
- 6.8th **The right to lodge a complaint** regarding the processing of personal data with the supervisory authority, i.e., the Office for Personal Data Protection;
- 6.9th **Rights regarding automated decision-making and profiling**, i.e., in particular, the right not to be subject to automated individual decision-making with legal or similar effects, including profiling.

7. Data Protection Officer

Data Subjects may direct their questions and comments regarding the processing and protection of personal data to the Data Protection Officer at QED GROUP, Mgr. Irena Lauermannova, email kancelar@sbak.cz, tel. +420 224 826 895.

8. Automated Processing and Profiling

As part of the processing of personal data, automated processing, including profiling, may occur. This means that QED GROUP may process personal data using software capable of processing the Data Subject's responses to questions and estimating various characteristics, including personality, preferred behavior, motivation, talents, and abilities. For the purpose of providing services to Data Subjects, QED GROUP may therefore process and evaluate the personal data provided and generate outputs using (primarily its own) software.

9. Log Information and Cookies

The QED GROUP website may collect information regarding standard server logs, including IP address, browser type and language, access time, and referring websites.

To ensure the effective management of QED GROUP's websites and to improve their usability, the websites may also use cookies or tracking pixels to collect aggregate data. QED GROUP has access only to aggregated data regarding cookies for functional purposes (so-called technical cookies); QED GROUP does not collect or store any individual (non-aggregated) cookies.

10. Disclosure of Personal Data to Third Parties

QED GROUP may disclose personal data to third parties, in particular:

- 10.1st if this arises from a contract concluded with the Data Subject;
- 10.2nd if it is appropriate or necessary for the purpose of providing services;
- 10.3rd if required by applicable laws, for the purpose of fulfilling legal obligations, in the context of judicial or administrative proceedings, etc.
- 10.4th in other cases, with the Data Subject's consent.

Recipients of personal data who are third parties include:

- a) external (sub)contractors providing services to QED GROUP;
- b) external providers of questionnaires and other similar diagnostic tools;
- c) providers of systems that enable the provision of services, such as email services and services used to respond to inquiries;
- d) cloud service providers;
- e) professional advisors and auditors;
- f) insurance companies;
- g) regulatory bodies, state authorities, government agencies, and departments.

External (sub)contractors and service providers may, depending on the scope and nature of the service provided, act as joint controllers or processors within the meaning of the relevant provisions of the GDPR. If QED GROUP uses external (sub)contractors and service providers, it requires them to implement and apply appropriate security measures to ensure the security of the Data Subject's personal data.

QED GROUP may share anonymized data (i.e., data that does not identify and is not linked to or linkable with a specific individual) with third parties, particularly for research, analysis, and other purposes.

Due to the international nature of online testing and training, QED GROUP may occasionally engage third parties to process or store personal data in countries outside the European Economic Area ("EEA") or to transfer such data to persons in such countries. These countries may not have data protection laws equivalent to those applicable in the EEA for the protection of personal data. If QED GROUP transfers personal data to such an external data processor and/or processes personal data outside the EEA, it will ensure that adequate safeguards are in place regarding technical, physical, administrative, and organizational security measures.

11. Additional Information for Data Subjects in Jurisdictions Outside the European Economic Area

Given the international nature of online testing and training, a data subject may be subject to laws applicable outside the European Economic Area. In such cases, Data Subjects may contact QED GROUP at qedgroup@qedgroup.cz for further information regarding their rights in connection with the processing of personal data outside the EEA.

12. Minors

The QED GROUP website is not intended for minors under the age of fifteen (15). QED GROUP does not knowingly collect, disclose, or sell personal data of minors under the age of 15 through its website.

If you are under 15 years of age and believe you have provided your personal data to QED GROUP, please ask your parents or legal guardians to notify QED GROUP.

13. Limited Scope of Personal Data Processing

If Data Subjects consent to the processing of personal data only to a limited extent, they may contact QED GROUP with their requests via qedgroup@qedgroup.cz .

14. Changes to the Privacy Policy

QED GROUP is authorized to amend and update this Policy to reflect current conditions and personal data processing procedures. Following each update, QED GROUP always updates the "Last Updated" date in the header of the Policy. QED GROUP encourages Data Subjects to regularly check the website containing the Policy and stay informed about any updates and changes.