



# Privacy notice

## Information about 2N's collection and use of your personal data

2N TELEKOMUNIKACE a.s. and our group of companies are committed to protecting your privacy and using your personal data in accordance with applicable data privacy legislation and 2N's Privacy Policy.

Please take a few minutes to read through the information below to understand why we collect and use your personal data.

References in this privacy notice to "2N", "we", "us", and "our" are references to 2N TELEKOMUNIKACE a.s.

The Privacy Notice is available at 2N website.

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  - d) If you, yourself or through a third party, provided 2N with your contact details to get general information about us or our products, solutions and/or services, to explore possible business opportunities, etc. (you may for example have given an 2N employee your business card at a trade show or submitted an inquiry through one of our web forms or other communication channels).
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  - f) If you are a job applicant and provided us with your personal data through one of our web forms or job search websites, e-mail or we obtained your personal data from an employment agency or other entity which acts as a independent controller in relation to your personal data.
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# 1. What is personal data?

Personal data is any information that can be used, alone or together with other data, to uniquely identify any living human being, such as your name, or any email addresses or phone numbers related to you personally.

# 2. What personal data do we collect and use, for what purposes and on what legal grounds?

**a) If you are an employee of or otherwise represent a company or you are a self-employed that supplies products, solutions and/or services to 2N.**

We collect the following personal data about you:

- Contact details. Typically, your name, email address(es) and phone number(s).
- Employment details. Typically, the name and contact details of your employer and your job title.
- Billing information: Details that we require you to provide if we make a payment (e.g., of a product or service) to you, for example your and your employer’s name, your and your company’s address(es) and email address(es) and financial information corresponding to your selected method of payment (e.g., your credit card details or bank account number).
- Other data that you intentionally share. Information about you that you voluntarily submit to us in for example free text fields, web forms and other contexts.

As applicable, we use this personal data for the following purposes:	Legal grounds for our collection and use of your personal data:
To send 'transactional information' to you. This is typically information directly related to commitments we may have towards you/your company based on the partnership and/or contract that we have with you/your company.	This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to sustain the business relationship with your company.
To do other things that you have explicitly asked us to do, for example if you chose to opt in to one or more specific activities that we offer.	If you have opted in to a specific activity that we offer, this use, including the collection of the personal data needed to do it, is necessary for the performance of the contract we have with you – that is, our obligation to provide to you or enable you to take part in the offered activity.
We use your contact details and employment details to execute and maintain, and perform obligations under the agreement between us and your company.	This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to uphold, maintain and administrate a contractual relationship that we have with your company.
We may use your contact details and employment details to check (screen using designated computer software) whether you or your company are barred under any laws or regulations from doing business with us and our group of companies, including but not limited to using our services (for example if you or your company are on any applicable sanctions lists or based in a country that is subject to an embargo).	This use, including the collection and use of the personal data needed to do it, is necessary for our compliance with relevant laws and regulations regarding sanctions lists for natural persons and organizations and embargos (legal obligations), that we have to follow. It is also necessary for the purpose of our legitimate interest to ensure that our group companies comply with such legal obligations.

**b) If you are an employee of or otherwise represent a company or you are a self-employed to which 2N provides products, solutions and/or services.**

We collect the following personal data about you:

- Contact details. Typically, your name, email address(es) and phone number(s).
- Employment details. Typically, the name and contact details of your employer and your job title.
- Billing information: Details that we require you to provide if we make a payment (e.g., of a product or service) to you, for example your and your employer's name, your and your company's address(es) and email address(es) and financial information corresponding to your selected method of payment (e.g., your credit card details or bank account number).
- Other data that you intentionally share. Information about you that you voluntarily submit to us in for example free text fields, web forms and other contexts.

<b>As applicable, we use this personal data for the following purposes:</b>	<b>Legal grounds for our collection and use of your personal data:</b>
To send 'transactional information' to you. This is typically information directly related to commitments we may have towards you/your company based on the partnership and/or contract that we have with you/your company.	This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to sustain the business relationship with you/your company.
To provide you with marketing communications, where you have opted in to receive such communications (including information about us, our products, solutions and services, competitions and promotions). These can be shared via electronic means (for example, SMS, emails and online advertising) and via post.	This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to market, promote and demonstrate our business, products, solutions, services, competitions, events and similar and to provide you and/or your company with relevant product, solution and service offerings and any other information about us and/or our products that you/your company may seek or we think might be of interest to you/your company.
To do other things that you have explicitly asked us to do, for example if you chose to opt in to one or more specific activities that we offer.	If you have opted in to a specific activity that we offer, this use, including the collection of the personal data needed to do it, is necessary for the performance of the contract we have with you/your company – that is, our obligation to provide to you/your company or enable you to take part in the offered activity.
We use your contact details and employment details to execute and maintain, and perform obligations under the agreement between us and you/your company.	This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to uphold, maintain and administrate the contractual relationship that we have with you/your company.
We may use your contact details and employment details to check (screen using designated computer software) whether you and/or your company are barred under any laws or regulations from doing business with us and our group of companies, including but not limited to using our services (for example if you and/or your company are on any applicable sanctions lists or based in a country that is subject to an embargo).	This use, including the collection and use of the personal data needed to do it, is necessary for our compliance with relevant laws and regulations regarding sanctions lists for natural persons and organizations and embargos (legal obligations), that we have to follow. It is also necessary for the purpose of our legitimate interest to ensure that our group companies comply with such legal obligations.

**c) If you are an employee of or otherwise represent a company participating in an 2N partner program (for example the 2N Technology Partner Program).**

We collect the following personal data about you:

- Contact details. Typically your name, email address(es) and phone number(s).
- Employment details. Typically the name and contact details of your employer and your job title.
- Other data that you intentionally share. Information about you that you voluntarily submit to us in for example free text fields, web forms and other contexts.

<b>As applicable, we use this personal data for the following purposes:</b>	<b>Legal grounds for our collection and use of your personal data:</b>
To send 'transactional information' to you. This is typically information directly related to commitments we may have towards you/your company based on the contract that we have with you/your company.	This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to sustain the partnership with you/your company.
To provide you with marketing communications, where you have opted in to receive such communications (including information about us, our products, solutions and services, competitions and promotions). These can be shared via electronic means (for example, emails and online advertising) and via post.	This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to market, promote and demonstrate our business, products, solutions, services, competitions, events and similar and to provide you and/or your company with relevant product, solution and service offerings and any other information about us and/or our products that you may seek or we think might be of interest to you/your company.
To do other things that you have explicitly asked us to do, for example if you chose to opt in to one or more specific activities that we offer.	If you have opted in to a specific activity that we offer, this use, including the collection of the personal data needed to do it, is necessary for the performance of the contract we have with you/your company – that is, our obligation to provide to you/your company or enable you/your company to take part in the offered activity.
If we have a partner agreement with you/your company, we use your contact details and employment details to execute and maintain, and perform obligations under, this agreement.	This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to uphold, maintain and administrate the contractual relationship that we have with you/your company.
We may use your contact details and employment details to check (screen using designated computer software) whether you and/or your company are barred under any laws or regulations from doing business with us and our group of companies, including but not limited to using our services (for example if you and/or your company are on any applicable sanctions lists or based in a country that is subject to an embargo).	This use, including the collection and use of the personal data needed to do it, is necessary for our compliance with relevant laws and regulations regarding sanctions lists for natural persons and organizations and embargos (legal obligations), that we have to follow. It is also necessary for the purpose of our legitimate interest to ensure that our group companies comply with such legal obligations.

**d) If you, yourself or through a third party, provided 2N with your contact details to get general information about us or our products, to explore possible business opportunities, etc. (you may for example have given an 2N employee your business card at a trade show or submitted an inquiry through one of our web forms or other communication channels).**

We collect the following personal data about you:

- Contact details. Typically, your name, email address(es) and phone number(s).
- Employment details. Typically, the name and contact details of your employer and your job title.
- Other data that you intentionally share. Information about you that you voluntarily submit to us in for example free text fields, web forms and other contexts.

As applicable, we use this personal data for the following purposes:	Legal grounds for our collection and use of your personal data:
To provide you with marketing communications, where you have opted in to receive such communications (including information about us, our products, solutions and services, competitions and promotions). These can be shared via electronic means (for example, SMS, emails and online advertising) and via post.	This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to market, promote and demonstrate our business, products, solutions, services, competitions, events and similar and to provide you and/or your company with relevant product, solution and service offerings and any other information about us and/or our products that you may seek or we think might be of interest to you/your company.
To do other things that you have explicitly asked us to do, for example if you chose to opt in to one or more specific activities that we offer.	If you have opted in to a specific activity that we offer, this use, including the collection of the personal data needed to do it, is necessary for the performance of the contract we have with you – that is, our obligation to provide to you or enable you to take part in the offered activity.
We may use your contact details and employment details to check (screen using designated computer software) whether you or your company are barred under any laws or regulations from doing business with us and our group of companies, including but not limited to using our services (for example if you or your company are on any applicable sanctions lists or based in a country that is subject to an embargo).	This use, including the collection and use of the personal data needed to do it, is necessary for our compliance with relevant laws and regulations regarding sanctions lists for natural persons and organizations and embargos (legal obligations), that we have to follow. It is also necessary for the purpose of our legitimate interest to ensure that our group companies comply with such legal obligations.

**e) If you have registered an 2N online account or provided your personal data through one of our web forms or other communication channels in order to obtain from 2N technical support, RMA service, pre-sales consultation, Media Library access, software downloads or mobile applications, or to use other 2N's services.**

We collect the following personal data about you:

- Contact details. Typically, your name, email address(es) and phone number(s).
- Employment details. Typically, the name and contact details of your employer and your job title.
- System data. Data that we need to grant you access for you to use our different online products, solutions and services (for example IP number and port number).

- Billing information. Details that we require you to provide if you make a payment (e.g., of a service fee) to us, for example your and your employer’s name, your and your company’s address(es) and email address(es) and financial information corresponding to your selected method of payment (e.g., your credit card details or bank account number).
- Account settings. Information about various preferences and personal details that you set for your 2N online account, for example, communication preferences (e.g., opting in or out of receiving various messages, from us).
- Location data \*)
- Other data that you intentionally share. Information about you that you voluntarily submit to us in for example free text fields, web forms and other contexts, or call recordings with 2N technical support.\*\*)

**\*) Location data/ permissions.** They are required in mobile devices using 2N apps which serve for building access control. The reason for requesting these permissions and the way they are used varies depending on the device’s operating system and way the app is being used.

Android: Location permissions are required in Android 11 and below to enable the use of Bluetooth Low Energy scanning, which is critical for function of these certain apps to know when a compatible 2N Reader is nearby. Those apps may also use Bluetooth Low Energy scanning to allow a door to be opened whilst the app is running in the background, allowing door opening without need to interact with the mobile device. In this scenario, background location permissions are required.

iOS: Location permissions are required to enable geofencing within the application. This allows more efficient battery usage since the application will be woken only when the device enters the geofenced areas where 2N readers are located.

In either operating system, we do not use location for user tracking, we do not store user location data centrally, nor do we share location data with anyone.

**\*\*) My2N service.** More information about personal data processing relating to your use of My2N service can be found here: <https://my2n.com/legal/privacy-notice>.

As applicable, we use this personal data for the following purposes:	Legal grounds for our collection and use of your personal data:
To create and manage your online accounts as requested by you when registering for providing you/your company with different services.	This use, including the collection of the personal data needed to do it, is necessary to perform (as applicable), the contract between us and you/your company regarding your use of your 2N online account and the service features available through the account, including ensuring that your use of our on-line products is in compliance with applicable terms and conditions for that use.  To the extent you use your 2N online account and the service features available through the account on behalf of/as a representative for your company, this use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to perform (as applicable), uphold, maintain and administrate the agreement between us and your company regarding your company’s use of your 2N online account and the service features available through the account, including ensuring that your company’s use of our on-line products is in compliance with applicable terms and conditions for that use.
To grant you access to and give you and/or your company the possibility to use our different online products, solutions and services (in accordance with and subject to the terms and conditions applicable in each case). For example, technical support, presales consultation, Media Library, 2N return material authorization (RMA) services, software downloads or mobile applications.	
To monitor, for our necessary administrative purposes, your use of our different online products, solutions and services.	
In particular, we use your contact details, employment details, system data, billing information and account settings to	This use, including the collection of the personal data needed to do it, is necessary to perform (as applicable), the contract

execute, maintain, and perform obligations under the agreement between us and you or your company regarding your use of your 2N online accounts and/or obtaining respective services.	between us and you/your company regarding your use of your 2N online accounts and obtaining the services.  To the extent you use your 2N online account and/or obtain the services on behalf of/as a representative for your company, this use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to perform (as applicable), uphold, maintain and administrate the agreement between us and your company regarding your company's use of your 2N online accounts and/or obtaining the services.
To send 'transactional information' to you. This is typically information directly related to commitments we may have towards you/your company based on the contract that we have with you/your company.	This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to sustain the business relationship with you or your company.
To provide you with marketing communications, where you have opted in to receive such communications (including information about us, our products, solutions and services, competitions and promotions). These can be shared via electronic means (for example, SMS, emails and online advertising) and via post.	This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to market, promote and demonstrate our business, products, solutions, services, competitions, events and similar and to provide you and/or your company with relevant product, solution and service offerings and any other information about us and/or our products that you/your company may seek or we think might be of interest to you/your company.
To do other things that you have explicitly asked us to do, for example if you chose to opt in to one or more specific activities that we offer.	If you have opted in to a specific activity that we offer, this use, including the collection of the personal data needed to do it, is necessary for the performance of the contract we have we you/your company – that is, our obligation to provide to you/your company or enable you to take part in the offered activity.
We may use your contact details and employment details to check (screen using designated computer software) whether you and/or your company are barred under any laws or regulations from doing business with us and our group of companies, including but not limited to using our services (for example if you and/or your company are on any applicable sanctions lists or based in a country that is subject to an embargo).	This use, including the collection and use of the personal data needed to do it, is necessary for our compliance with relevant laws and regulations regarding sanctions lists for natural persons and organizations and embargos (legal obligations), that we have to follow. It is also necessary for the purpose of our legitimate interest to ensure that our group companies comply with such legal obligations.

**f) If you do not belong to any of the other categories of individuals but you are still an employee of, or otherwise represent, a company or an organization or you are a self-employed that 2N has established contact with visitors to a 2N building or a journalist, for example.**

We collect the following personal data about you:

- Contact details. Typically, your name, email address(es) and phone number(s).
- Details of your qualifications, skills, experience and employment history.
- Information about your entitlement to work in the Czech Republic.
- Details of your occupational psychological profile (for selected positions).



- Other data that you intentionally share. Information about you that you voluntarily submit to us in your CV, cover letter and other contexts.
- We may also collect personal data about you from third parties, such as references supplied by former employers. We will seek information from third parties only once a job offer to you has been made and will inform you that we are doing so.

<b>As applicable, we use this personal data for the following purposes:</b>	<b>Legal grounds for our collection and use of your personal data:</b>
We need to process data to take steps at your request prior to entering into a contract with you. We may also need to process your data to enter into a contract with you.	2N has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.
In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, to check a successful applicant's eligibility to work in the Czech Republic before employment starts.	<p>If your application for employment is unsuccessful, we will hold your data on file for 6 (six) months after the end of the relevant recruitment process.</p> <p>In the case of psychodiagnostics of selected candidates the psychological profile is kept for the duration of the selection procedure, after which it is deleted.</p> <p>If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your Human Resources file and retained during your employment. In such case a new privacy notice will be provided to you.</p>
If your application is unsuccessful, we may keep your personal data on file in case there are future employment opportunities for which you may be suited.	This use requires your consent which we will ask you for before it keeps your data for this purpose and you are free to withdraw your consent at any time.

**g) If you do not belong to any of the other categories of individuals but you are still an employee of, or otherwise represent, a company or an organization or you are a self-employed that 2N has established contact with (visitors to a 2N building or a journalist, for example).**

We collect the following personal data about you:

- Contact details. Typically, your name, email address(es) and phone number(s).
- Employment details. Typically, the name and contact details of your employer and your job title.
- Other data you intentionally share with us, such as information you voluntarily give us by filling in optional fields, website forms, visiting a 2N building or other manner.

<b>As applicable, we use this personal data for the following purposes:</b>	<b>Legal grounds for our collection and use of your personal data:</b>
To send 'transactional information' to you. This is typically information directly related to commitments we may have towards you/your company based on the partnership and/or contract that we have with you/your company.	This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to sustain the relationship with you or your company.

To do other things that you have explicitly asked us to do, for example if you chose to opt in to one or more specific activities that we offer.	If you have opted in to a specific activity that we offer, this use, including the collection of the personal data needed to do it, is necessary for the performance of the contract we have we you/your company – that is, our obligation to provide to you/your company or enable you/your company to take part in the offered activity.
For the purpose of controlling access to our building, which you enter voluntarily as a visitor.	Processing personal data is essential for our legitimate interest in controlling people's access to the building.*)

\*) **Visitors.** More information about the processing of personal data of the visitors of 2N's Modřany location can be found here: [https://www.2n.com/en\\_GB/privacy-notice-for-2n-visitors](https://www.2n.com/en_GB/privacy-notice-for-2n-visitors)

### 3. With whom do we share your personal data?

2N do not sell your personal data. However, 2N operates globally and if needed, we may share your personal data with our group of companies and business partners – but only for the purposes described in this Privacy Notice.

Personal data encompassed by the GDPR may be transferred to organizations in countries even outside the European Union and the European Economic Area. We will not transfer any of your personal data to organizations in countries outside of the European Union and the European Economic Area (third country) without ensuring appropriate safeguards for the protection of your personal data, for example the existence of a so called 'adequacy decision' by the Commission or the inclusion of the so-called 'standard contractual clauses' (as approved by the European Commission from time to time) in a contract between us and the respective third country recipient company of your personal data. How long do we keep your personal data?

### 4. How long do we keep your personal data?

We will not use your personal data for any longer than needed in order to fulfill the purposes described in this Privacy Notice. After that, we will delete or permanently de-identify your personal data unless required or entitled by law to retain it, or parts of it.

### 5. Who is responsible for the processing of your personal data?

2N TELEKOMUNIKACE a.s., the company incorporated under the laws of the Czech Republic, corporate registration number 26183960, registered in the Corporate Registry administrated by the Municipal Court in Prague, file no. B 6613, is the data controller of your personal data collected and used for the purposes described in this Privacy Notice. This means that 2N TELEKOMUNIKACE a.s. is responsible for collecting and using your personal data in accordance with applicable law. 2N TELEKOMUNIKACE a.s. has its principal place of business at Modřanská 621/72, 14301 Prague, Czech Republic. You can reach our data protection administrator at [dataprotection@2n.com](mailto:dataprotection@2n.com).

When you use 2N services you may, depending on and as part of such services, submit to or give us access to certain content, and the services may display such content, which 2N does not own or control. Examples of such data are image and video materials and other information about yourself and/or others, including any personal data contained therein, that you submit as part of using a service ('User Content'). For the purposes of this Privacy Notice, User Content is not the same thing as the personal data that we collect and use as a data controller according to this Privacy Notice. You, not 2N, are the controller of any User Content and we will only process it on your behalf according to your instructions and applicable law.

### 6. What are your rights in relation to your personal data held by us?

If we process your personal data you have several rights as set out below. 2N values your privacy and recognizes the importance of protecting your personal data and will never discriminate you for exercising any of these rights.

In some cases, you can always verify and make corrections and additions to your personal data that are available when signed in to your online 2N account (go to your profile).

You have a right to get information on what personal data we have about you, access this data, request that we erase certain parts or all of your personal data, request that we restrict the use of or stop using your personal data, and have your personal data resubmitted to you in a structured and accessible format.

If you wish to exercise any of these rights, you can submit your request or questions to 2N's GDPR administrator via e-mail at [dataprotection@2n.com](mailto:dataprotection@2n.com) or in writing at the Company's registered office at Modřanská 621/72, Prague 4, 143 01 Czech Republic.

Please note that if you ask us to erase or restrict the use of any of your personal data, we may not be able to continue managing your 2N online account and/or providing services to you.

If you have given your written consent to the processing, you have the right to withdraw the consent provided by you at any time by contacting us. If your consent is withdrawn, we will no longer process your personal data for the purpose that you had given your consent to.

Should you be dissatisfied with our collection and use of your personal data, please let us know and we will do our best to address your complaints. Your privacy is very important to us, and we always strive to protect and secure your personal data in the best possible way. Should you feel that we have failed in this ambition, you are entitled to lodge a complaint with the Czech Data Protection Authority (in Czech: Úřad pro ochranu osobních údajů), or such other supervisory authority as may be determined in the future.