

Privacy and Personal Data Processing Policy

for business relationships, electronic orders and the SORBETIN website

This Policy explains how NP manufacturing SE processes personal data in connection with the sale and distribution of SORBETIN products. It applies to customers, prospective business partners, suppliers, their representatives and visitors to the website. Personal data are processed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR), Czech Act No. 110/2019 Coll., on Personal Data Processing, and other applicable legislation.

This Policy is provided for information purposes. Acceptance of this Policy, or consent to the processing of personal data, is not a condition for entering into a contract where the processing is necessary for pre-contractual steps, performance of a contract, compliance with a legal obligation or the protection of the Controller's legitimate interests.

1 Data Controller

The data controller is NP manufacturing SE, a European Company (Societas Europaea), Company ID No. 07919298, with its registered office at Za sokolovnou 1284/9a, Suchbát, 165 00 Prague 6, Czech Republic, registered in the Commercial Register maintained by the Municipal Court in Prague, Section H, File 2225 (the "Controller").

Contact email for privacy-related questions and requests: sorbetin@post.cz

Website: www.sorbetin.com

The Controller is not required to appoint a Data Protection Officer. Unless a Data Protection Officer is appointed, requests will be handled by the Controller through the contact details stated above.

2 Persons Covered by this Policy

The GDPR protects the personal data of natural persons. Information relating solely to a legal entity does not constitute personal data. This Policy nevertheless also applies to the personal data of natural persons acting on behalf of legal entities, including members of governing bodies, employees, contact persons, authorised representatives, beneficial owners and other representatives of business partners.

3 Categories of Personal Data Processed

Depending on the nature of the business relationship, we may process in particular:

- identification data, including first name, surname, job title and relationship to the represented company;
- contact details, including email address, telephone number, delivery address and billing address;
- business and representation details, including company name, company registration number, VAT number, EORI number, position, power of attorney and information obtained from public registers;
- order and contract information, including enquiries, products ordered, quantities, prices, delivery and payment terms, complaints and related communications;
- payment and accounting information, including bank account details, payment information and information appearing on accounting and tax documents;
- information required for transport, customs clearance, business-partner screening and compliance with sanctions, export-control or other legal obligations, where necessary for the relevant transaction;

- technical information connected with use of the website, such as IP address, device information, server logs and cookie identifiers, where applicable.

4 Sources of Personal Data

We obtain personal data primarily from the data subject or from the company that the data subject represents, through an enquiry, registration, order, contract, email, telephone call, meeting or other business contact. We may also obtain personal data from commercial intermediaries, carriers, advisers, public authorities, publicly available registers and other lawful sources where this is necessary to verify a business partner or protect our rights.

5 Purposes and Legal Bases of Processing

Purpose	Scope of processing	Legal basis
Enquiries and pre-contractual negotiations	Handling enquiries, preparing offers, commercial and technical communications, and verifying authority to act.	Article 6(1)(b) GDPR; for representatives of legal entities, also Article 6(1)(f) GDPR.
Orders and performance of contracts	Entering into and performing contracts, delivering goods, communications, invoicing, payments, complaints and customer support.	Article 6(1)(b) GDPR; for contact persons, also Article 6(1)(f) GDPR.
Legal and regulatory obligations	Accounting, taxation, customs obligations, sanctions and compliance screening, and cooperation with public authorities.	Article 6(1)(c) GDPR.
Protection of rights and security	Fraud prevention, system security, records of communications, and the establishment, exercise or defence of legal claims.	Article 6(1)(f) GDPR.
Direct marketing	Sending communications to existing customers concerning similar products; recipients may object or unsubscribe at any time.	Legitimate interests under Article 6(1)(f) GDPR and the conditions of Czech Act No. 480/2004 Coll.; in other cases, consent under Article 6(1)(a) GDPR.
Website and analytics	Providing essential website functionality and security; audience measurement and analytics only to the extent permitted by the user's cookie settings.	Necessary processing: Article 6(1)(f) GDPR; analytics and marketing cookies: consent under Article 6(1)(a) GDPR.

Where processing is based on a legitimate interest, that interest consists primarily in the proper management of business relationships, communication with the contact persons of business partners, protection of property and legal claims, and the secure operation of the website and information systems. The data subject has the right to object to such processing.

6 Requirement to Provide Personal Data

The provision of personal data necessary for entering into and performing a contract, or for compliance with a legal obligation, is a contractual or statutory requirement. Without such information, we may be unable to process an enquiry, enter into a contract, deliver goods or comply with related legal obligations. Personal data processed on the basis of consent are provided voluntarily. Consent may be withdrawn at any time without affecting the lawfulness of processing carried out before its withdrawal.

7 Retention Periods

Category	Retention period
Enquiries not resulting in a contract	For the time necessary to handle the enquiry, normally no longer than three years after the last substantive communication, unless there is a reason for longer retention.
Contractual and commercial documentation	For the duration of the contractual relationship and normally for three years thereafter; longer where a complaint, warranty, limitation or court period remains pending.
Accounting and tax documents	For the period prescribed by applicable law, generally five or ten years depending on the type of document.
Legal claims and disputes	For the period necessary to establish, exercise or defend legal claims and for the duration of any related proceedings.
Direct marketing	Until consent is withdrawn or an objection is made, and in any event only for a reasonable period after the last active business relationship.
Cookies and technical data	According to the type of cookie and the settings stated in the cookie banner or a separate Cookie Policy.

At the end of the applicable retention period, personal data will be securely erased or anonymised unless further retention is required by law or necessary for the protection of legal claims. The obligation to erase data does not apply to information that must continue to be retained on a lawful basis.

8 Recipients and Processors

We disclose personal data only to the extent necessary. Recipients may include:

- providers of the website platform, hosting, email, IT support and security services, including Webnode AG where its platform is used;
- carriers and logistics partners, including Czech Post, DHL, UPS or another carrier agreed for the relevant transaction;
- banks, payment service providers, insurers and financial institutions involved in the transaction;
- accounting, tax, legal, audit and compliance advisers;
- customs representatives, inspection companies, warehouses, manufacturers and other contractual partners where necessary for a particular delivery;
- public authorities, courts and other authorised bodies where required by law or necessary to protect the Controller's rights.

Processors handle personal data under a contract and in accordance with the Controller's instructions, unless they act as independent controllers under applicable law. The specific service providers used by the Controller may change from time to time.

9 Transfers Outside the European Economic Area

Because our business is international, personal data may, where necessary, be transferred to recipients outside the European Economic Area, including foreign carriers, customers, banks, customs representatives and providers of information or analytics services. Any such transfer is made only in accordance with Chapter V of the GDPR, in particular on the basis of an adequacy decision adopted by the European Commission, Standard Contractual Clauses, an applicable data-transfer framework or another lawful derogation. Information about the safeguards used for a specific transfer may be requested from the Controller using the contact email stated above.

10 Cookies and Google Analytics

The website may use cookies that are strictly necessary for its operation. Analytics or marketing cookies, including Google Analytics, may be activated only after the user has given prior consent, unless otherwise permitted by law. Users must be able to grant, refuse and subsequently change their consent with equal ease. Details of the cookies used, their providers, purposes and storage periods should be set out in a separate Cookie Policy or directly in the cookie settings interface.

11 Rights of Data Subjects

Subject to the conditions set out in the GDPR, a data subject has, in particular, the right to:

- obtain confirmation as to whether personal data concerning them are being processed and request access to those data;
- request correction of inaccurate data or completion of incomplete data;
- request erasure of personal data where the applicable legal conditions are met;
- request restriction of processing;
- receive personal data in a structured, commonly used and machine-readable format and, where the right to data portability applies, transmit those data to another controller;
- withdraw consent at any time where processing is based on consent;
- object to processing based on legitimate interests; an objection to processing for direct-marketing purposes may be made at any time, after which the personal data will no longer be processed for that purpose;
- lodge a complaint with the Czech Office for Personal Data Protection, Pplk. Sochora 27, 170 00 Prague 7, Czech Republic, www.uoou.gov.cz.

Requests may be submitted to sorbetin@post.cz. Before handling a request, the Controller may take proportionate steps to verify the identity of the applicant. The Controller will respond without undue delay, normally within one month. In complex cases, that period may be extended subject to the conditions of the GDPR.

12 Automated Decision Making

The Controller does not carry out decision-making based solely on automated processing, including profiling, that produces legal effects concerning the data subject or similarly significantly affects them.

13 Security of Personal Data

The Controller implements appropriate technical and organisational measures proportionate to the nature of the processing and the associated risks. These measures include access controls, protection of accounts and devices, backups, updates, protection against malicious software, contractual confidentiality obligations and appropriate oversight of service providers. Security measures are reviewed and adapted as technology and risks develop.

14 Changes to this Policy

The Controller may update this Policy where appropriate, in particular following changes to processing activities, service providers or applicable legislation. The current version will be published on the website together with its effective date. Where a change materially affects the rights of data subjects, the Controller will provide appropriate notice where required by law.

15 Effective Date

This Policy takes effect on 21 September 2026 and replaces the previous privacy policy applicable to the SORBETIN website and business activities.

NP manufacturing SE
Ludvík Krajčí
Chairman of the Board