

# Privacy Policy

## I. Opening Provisions

1. The Data Controller pursuant to Article 4(7) of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“GDPR”) is Key2Business s.r.o., ID No.CZ08267863:, with its registered office at Na Hrázkách 115, 739 34 Šenov(“Controller”).

2. Contact details of the Controller:  
Address: Na Hrázkách 115, 739 34 Šenov  
E-mail: kamil.kostal@k2bcz.com,  
Phone: +420 775 707 885

3. Personal data mean any information relating to an identified or identifiable natural person; an identifiable natural 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, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

4. The Controller has not appointed any data protection officer.

## II. Sources and Categories of Processed Personal Data

1. The Controller processes personal data you have provided to it or personal data that the Controller has obtained on the basis of the fulfillment of your purchase order.

2. The Controller processes your identification and contact details and data necessary for the performance of the contract.

## III. Legal Reason and Purpose of Personal Data Processing

1. The legal reason for the processing of personal data is

- the performance of the contract between you and the Controller under Article 6(1)(b) of the GDPR,
- the legitimate interest of the Controller in providing direct marketing (in particular for sending commercial messages and newsletters) under Article 6(1)(f) of the GDPR,
- your consent to processing for the purpose of providing direct marketing (in particular for sending commercial messages and newsletters) pursuant to Article 6(1)(a) of the GDPR

in conjunction with Section 7(2) of the Act No.480/2004 Coll., on certain Information Society Services, if no goods or services have been ordered.

2. The purpose of the processing of personal data is

- to process your purchase order and exercise the rights and fulfill the responsibilities arising from the contractual relationship between you and the Controller; the purchase order requires personal data necessary for its successful completion (name and address, contact details), provision of personal data is a necessary requirement for the conclusion and performance of the contract, as the contract cannot be concluded or performed by the Controller if personal data are not provided,
- to send commercial communications and conduct other marketing activities.

3. The Controller is not involved in automated individual decision-making within the meaning of Article 22 of the GDPR. You have given your explicit consent to such processing.

#### **IV.**

### **Data Retention Period**

1. The Controller retains personal data

- for the period necessary for the exercise of rights and fulfilment of obligations arising from the contractual relationship established between you and the Controller and for the exercise of claims under such contractual relationships (for a period of 15 years following the termination of the contractual relationship),
- until the consent to the processing of personal data for marketing purposes is revoked, for a maximum of 10 years if personal data are processed under a consent.

2. Upon the lapse of the retention period, the Controller shall erase the personal data.

#### **V.**

### **Recipients of Personal Data (Subcontractors of the Data Controller)**

1, Recipients of personal data are partners

- involved in the delivery of goods / services / payment processing under the contract,
- involved in the provision of the services,
- providing marketing services.

2. The Controller does not intend to transfer the personal data to a third country (non-EU countries) or to an international organization. The recipients of personal data in third countries are providers of mailing services / cloud services.

#### **VI. Rights**

Under the conditions set forth in the GDPR, you have

- the right to access your personal data pursuant to Article 15 of the GDPR,

- the right to rectify personal data pursuant to Article 16 of the GDPR, or to restrict processing pursuant to Article 18 of the GDPR.
  - the right to erasure of personal data pursuant to Article 17 of the GDPR,
  - the right to object to processing pursuant to Article 21 of the GDPR, and
  - the right to data portability pursuant to Article 20 of the GDPR.
  - the right to withdraw consent to processing in writing or electronically to the address or email of the controller specified in Article III of these terms and conditions.
- You also have the right to file a complaint with the Office for Personal Data Protection if you believe that your right to personal data protection has been violated.

## **VII. Conditions for the Security of Personal Data**

1. The controller declares that it has taken all appropriate technical and organizational measures to secure personal data.
2. The Controller has implemented technical measures to secure data storage systems and physical storage of personal data, including the use of the secure HTTPS protocol, antivirus software, and firewalls.
3. The Controller declares that access to personal data is restricted to persons authorized by the Controller.

## **VIII. Final Provisions**

1. By submitting an order via the online order form, you confirm that you are familiar with the terms and conditions of personal data protection and that you accept them in their entirety.
2. You agree to these terms by checking the consent box on the online form. By checking the consent box, you confirm that you are familiar with the terms of the Privacy Policy and that you accept them in their entirety.
3. The controller is entitled to amend these terms. The controller will publish the new version of the privacy policy on its website or, if applicable, send the new version of these terms to the email address you provided to the controller.

These terms take effect on June 18, 2019.