

## **PRIVACY POLICY**

As much as we care about your satisfaction, we also respect your right to be fully informed about how we handle the data you provide to us. Please feel free to read the details below.

Pursuant to 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 (hereinafter referred to as "**GDPR**"), we are obliged to inform our customers, business partners, about which of their data and personal data we handle, in what way and for what reason.

### **PERSONAL DATA AND HOW WE HANDLE IT**

The personal data that we process is only that which you voluntarily provide to us and which relates to individuals, natural persons, when you order our products. At most, this includes the following data:

- (a) name and surname
- (b) the registered office address (and, where appropriate, the delivery address)
- (c) Reg. Nr.
- (d) phone
- (e) e-mail address

It is therefore information that serves or may serve to identify you. You provide this information to us in order to enable the proper exercise of all mutual rights and obligations in connection with the purchase of our products. In particular, this is so that we can deliver the products you have ordered and, where appropriate, communicate with you in connection with the delivery in order to make it as convenient as possible for you to purchase our products (e.g. so that we can communicate with you further about your order, or so that we can reflect a change in various circumstances in the course of the business relationship, for example, so that you would like to change the delivery address or negotiate special conditions).

If you order products from us as a representative of a another person, usually trading company, we process your personal data in the same way and for the same purpose on the basis of our legitimate interest in concluding and performing a contract with the person you represent.

If you have used the option of shipping the products via a carrier, at the time as we process your order internally, we will transfer your delivery data together with the i products for delivery to the carrier, which is the carrier you have chosen or the carrier we have designated in accordance with the mutual agreement and whose identification is derived from the documents we have supplied in connection with your order. Beyond that, we do not handle your personal data (for your e-mail address, see retention of personal data) and we do not provide or pass it on to anyone else. The carriers are independent data controllers after the transfer of your personal data and you can exercise your rights in relation to the processing of your personal data by them directly with them. We are, of course, always ready to support you in this respect.

You may also wish to add further information to your order by message together with your order. In this case, this message alone (i.e. when separated from your personal data) will not constitute personal data within the meaning of the GDPR.

If you provide information via a message beyond that which we require in connection with the order, which, even on its own, is personal data, we will not deal with this information in any further way and its use is only for the purpose of meeting your needs in connection with the performance of the contract and the delivery of the products you have ordered. Such information will subsequently be deleted under the same conditions as other personal data provided by you (see retention of personal data).

## **RETENTION OF PERSONAL DATA**

We store your personal data for the time necessary to process your order for the purpose of fulfilling the contract you enter into with us at the time of ordering. Thereafter, we retain the data on the basis of our legitimate interest, in order to protect our legal claims, if any, and also on the basis of the law, exclusively for the purposes set out in the relevant laws.

The personal data you have provided to us in connection with the purchase of our products may only ever be handled in accordance with the purpose for which it was provided and for which it is held. After the retention period specified in accordance with the individual processing grounds (performance of the contract, legitimate interest and the law), the data in electronic form is automatically deleted from the relevant records:

- (a) after your order has been processed from the database for order processing, thus the fulfilment of contracts,
- (b) after 1 year from the completion of your order from the database for the purposes of protecting our legitimate interests, unless:
  - a judicial, administrative or other proceeding has been initiated, in which case we process your personal data to the extent necessary for the duration of such proceedings or any subsequent proceedings,
  - the storage of your e-mail address for the purpose of sending you commercial communications related to your purchase and if you have not expressed your disagreement with such communication.
- (c) after a period of 5 years (unless a longer period is stipulated by law in the future) with regard to identification data and basic order data in order to comply with our legal obligations arising in particular from the following legal provisions:
  - Act of the Czech Republic No. 563/1991 Coll., on Accounting,
  - Act of the Czech Republic No. 235/2004 Coll., on Value Added Tax.

We hold personal data stored on the basis of the law for the purpose of compliance with our legal obligations in the form of electronic or printed documentation for the period required by the relevant legal regulation, while observing the rules for their archiving and also for their shredding.

As can be seen from the above retention periods, the exception is your email address in the case you have concluded a purchase contract with us, which we keep in our electronic database for our legitimate promotional interest, in the event that we want to notify you of our new products in the future (in accordance with the legal regulation of commercial communications). If you do not want us

to keep your email address, it is sufficient if you inform us via the contact details provided for the data controller below and we will delete it (see rights you can exercise).

## **SECURITY OF PERSONAL DATA**

The personal data that you provide to us in the context of your order are processed by appropriate technical tools, only by persons authorised by us, as the data controller, and subject to appropriate organisational measures for their proper security.

## **PERSONAL DATA CONTROLLER**

Above you have learned what personal data we process and how we process it. We are therefore the data controller to the extent indicated. We are Blue Projects Agency, s.r.o, Reg. No.: 27448932, which can be contacted regarding the processing of your personal data via the following contact details:

- Address: Roháčova 188/37, 130 00 Prague 3, Czech Republic (EU)
- email: [pavel.duchek@bpagency.cz](mailto:pavel.duchek@bpagency.cz)
- phone: +420 777 22 86 06

## **THE RIGHTS YOU CAN EXERCISE**

Under the GDPR, you have the following rights, which can be exercised via the contact details provided for the data controller. In view of the type and amount of personal data we process, we elaborate on the individual rights below:

- **Right of access to personal data** - you can find out whether we still have your personal data in the database, what it is and, if applicable, how and for what purpose we handle it and for how long we will continue to handle it. If we do not process any of your personal data, we will provide you with this information.

In general, if we have your personal data, we will only dispose of it if you have provided it in connection with the purchase of our products and we will handle it in the manner described above (see personal data and how we handle it). In the event that you have provided us with additional data together with your consent to its processing, you have the right to withdraw your consent to its processing, of which you have been informed by a special information about processing on the basis of consent (see right to withdraw consent to processing).

- **Right to rectification of personal data** - you can ask us to update the personal data you have provided to us (e.g. if you change your email address and wish us to have your new email address).
- **Right to erasure of personal data** - if we have processed personal data in a way that is contrary to the law, or if we have kept personal data for longer than is necessary for the purposes set out above (see personal data and how we handle it), you have the right to have it erased.
- **Right to object to processing** - generally, an objection can be used to restrict the processing of personal data so that it is not erased but not further processed. This relates to your right to restrict the processing of personal data where, for example, it is disputed whether you have a right to erasure. However, with the exception of email addresses, which we retain even after

the contract has been fulfilled, we do not handle your personal data and erase it after a certain period of time. If you do not wish us to keep your email addresses, you can simply notify us and request their deletion under the right to erasure of personal data (see retention of personal data).

- **Right to data portability** - generally, you can request the data you would have provided to us for the purpose of transferring it to another controller in a commonly used machine-readable format if the processing is automated.
- **Right to withdraw consent to processing** - provided that we have obtained your personal data on the basis of your consent, you could withdraw your consent at any time. However, in general, any personal data you have provided to us is processed by us on the basis of the contract you enter into with us when you order our products, or subsequently on the basis of our legitimate interest or the law. It cannot be prevented from being processed in this way by withdrawal of your consent.

However, if we have asked you to consent to the processing of further data or to the processing of data that you have already provided to us for another purpose, then you only need to let us know that you are withdrawing your consent. In relation to such processing, you have been provided with specific information about processing based on consent.

You also have the right to request verification of the lawfulness of the processing of personal data or to lodge a complaint if you believe that your right to the protection of personal data has been violated. In the Czech Republic, the competent authority for the processing is the Personal Data Protection Office of the Czech Republic, which is entitled to verify the lawfulness of the processing of personal data on the basis of your request and which is located at Pplk. Sochor 27, 170 00 Prague 7, Czech Republic (EU). You can do the same with another authority competent under the GDPR in the EU member state from where you are ordering our products.