

# Privacy Policy (GDPR)

## I.

### Basic provision

1. The personal data controller pursuant to Article 4 (7) of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as "GDPR") is Dipozitiv s.r.o. registered office at Havanská 1087/3a, Bubeneč, 170 00 Prague 7 (hereinafter referred to as "Administrator").
2. Administrator contact details are hello@dipozitiv.cz.
3. Personal data means all information about an identified or identifiable natural person; an identifiable natural person is a natural person who can be identified, directly or indirectly, in particular by reference to a particular identifier, such as name, identification number, location information, network identifier or one or more specific physical, physiological, genetic, psychological, economic, cultural or the social identity of this natural person.
4. The Administrator did not appoint a Data Protection Officer.

## II.

### Legal reason for processing personal data

1. The legal reason for the processing of personal data is
  - performance of the contract between you and the administrator pursuant to Art. 6 paragraph 1, letter (b) GDPR (hereinafter referred to as "Performance of the contract");
  - the legitimate interest of the controller in the provision of direct marketing (in particular for sending commercial messages and newsletters) pursuant to Article 6 paragraph (1) letter (f) GDPR (hereinafter referred to as "legitimate Interest");
  - Your agree to the processing for the purpose of providing direct marketing (in particular for sending commercial messages and newsletters) pursuant to art. 6, paragraph 1, letter a) GDPR in conjunction with Section § 7 (2) of Act No. 480/2004 Coll., on certain information services, in the absence of an order for goods or services (hereinafter referred to as "Consent").
2. There is no automatic individual decision-making within the meaning of Article 22 of the GDPR. You have given your explicit consent to such processing.

### III.

## Purpose of processing, categories, sources and recipients of personal data

Role	Legal reason	Purpose	Data	Source of data	Recipients of personal data (processors)
<b>Administrator</b>	Performance of the contract	Applying to the competition and responding to the request sent via the contact form	Client's personal data (contact details)	Contact and order form	Subcontractors, mailing services, cloud storage, shipping companies, payment gateways
<b>Administrator</b>	Justified interest	Providing direct marketing (especially for sending business messages and newsletters)	Client's contact details	Information from the application form	Mailing services, cloud storage, subcontractors
<b>Administrator</b>	Justified interest	Usual traffic analysis, detection of server errors and prevention of fraud and attacks on the server	For 50 months: Third-party cookies, pseudo-anonymized registered user identifiers such as UserID, IP address, and web browsing data.	User movement on the web, registration, and creation of anonymized user ID, displaying a page with error	Google Analytics, web hosting services and possibly other analytics services
<b>Administrator</b>	Consent	Targeted advertising (retargeting)	For a maximum of 13 months: Third-party cookies, IP addresses, browser data, and web browsing data	View certain pages on the web	Advertising platforms enabling retargeting (AdWords, Sklik, Facebook)
<b>Administrator</b>	Consent	Get demographic reports in traffic statistics	Third-party cookies, demographics (age, gender, interests, interest, and other categories)	DoubleClick cookie, Android advertising ID, iOS ID for advertisers	Google Analytics
<b>Administrator</b>	Consent	Marketing and website promotion	Emails, lead names, IP addresses, and other technical identifiers	Newsletter form	Web hosting company and e-mail distribution services
<b>Administrator</b>	Consent	Profiling to show targeted content on the web and in the direct marketing (newsletters)	Cookie file with user identification, URL of viewed page	Browse certain pages on the web	Facebook, web hosting company

## **IV.**

### **Data retention period**

1. Unless otherwise stated in the preceding paragraphs, the Administrator keeps personal information
  - for the period necessary to exercise the rights and obligations arising from the contractual relationship between you and the Administrator and to assert claims arising from these contractual relationships (for a period of 15 years from the termination of the contractual relationship).
  - for as long as the consent to the processing of personal data for marketing purposes is withdrawn if the personal data are processed by consent.
2. After the personal data retention period has expired, the controller will delete the personal data.

## **V.**

### **Cookies**

1. If are cookies in the personal data in the point III., the following rules apply to their processing.
  - The rules for the use or blocking of cookies can be set by each user in their Internet browser, thereby expressing their consent to their processing. You can check the instructions manual for blocking cookies.
  - The user can choose and set to allow or disable all or some of the cookies (eg, third-party cookies). Blocking cookies may adversely affect the usability of the website and service.
  - On this website, visitors who agree to place cookies on their browsers are given information from the following companies by appropriately adjusting their browser behavior:
    - Facebook
    - Google
    - Disqus
    - Leady
2. If you object to the processing of technical cookies necessary for the operation of the website, the full functionality, and compatibility of the website cannot be guaranteed.

## **VI.**

### **Recipients of personal data (subcontractors of the administrator)**

1. The administrator intends to transfer personal data to a third country (to a non-EU country) or an international organization. The recipients of personal data in third countries are providers of mailing services, data and file storage, analysis tools and direct marketing services.

## **VII.**

### **Your rights**

1. Under the conditions set out in GDPR you have
  - the right of access to your personal data pursuant to Article 15 of the GDPR,
  - the right to correct a personal data pursuant to Article 16 of the GDPR, or the restriction of processing pursuant to Article 18 of the GDPR,
  - the right to delete personal data pursuant to Article 17 of the GDPR,
  - the right to object to the processing under Article 21 of the GDPR,
  - the right to data portability under Article 20 of the GDPR,
  - the right to withdraw consent to the processing in writing or electronically to the address or email of the administrator specified in Article III under this policy.
2. You also have the right to put a complaint with the Office for Personal Data Protection if you believe that your right to privacy has been violated.

## **VIII.**

### **Terms of personal data security**

1. The administrator declares that it has taken all appropriate technical and organizational measures to safeguard personal data.
2. The administrator has taken technical measures to secure digital data services and personal data stored in paper form, in particular ...
3. The administrator declares that only the persons authorized by him have access to personal data.

## **IX.**

### **Final Provisions**

1. By submitting your application form, you confirm that you are familiar with the terms of privacy and that you accept them in their entirety.
2. You agree with these terms by checking your consent via the online form. By checking your consent, you acknowledge that you are familiar with and accept the terms of privacy.
3. The Administrator is entitled to change these terms. The Administrator will publish the new version of the Privacy Policy on their website and at the same time send you a new version of the Privacy Policy to your e-mail address, which you provided to the administrator.

These terms come into effect on 30<sup>th</sup> of May 2019.