

# Personal Data Processing Principles

We are Shoptet, a.s., ID No. 289 35 675, with our registered office at Dvořeckého 628/8, Břevnov, 160 00, Prague 6, the company registered at the Municipal Court in Prague, Section B, Insert 25395.

We process some of your personal data for the provision of our services and our operation. At Shoptet, we consider the personal data of our customers, suppliers and other persons to be something to be protected. Please see below to learn how Shoptet approaches the protection of personal data of its customers, potential customers, suppliers or other data subjects, as applicable. The processing of personal data is treated as strictly confidential and personal data is handled in accordance with applicable data protection legislation, in particular the General Data Protection Regulation (EU) 2016/679 ("**GDPR**").

## Inquiring about our services?

We have a wide portfolio of products and services. You can find it at [www.shoptet.cz](http://www.shoptet.cz) or on their individual websites. We will be happy if you contact us or try the products directly.

If you **enquire** about our products and services, we will work with the contact details you provide us. This is most often your name, surname, e-mail, telephone number, your requirements regarding our products and services, or other information that you fill in the enquiry form or give us as part of further arrangements. Why?

- We contact you through the contact details for further arrangement (Article 6(1)(b), (f) of GDPR);
- If you opt for our products or services, we will communicate with you through these contact details (Art. 6(1)(b), (f) of GDPR);
- We will use them to evidence our fulfilment of our obligations under the law or under contracts (Article 6(1)(c) of GDPR).

If you choose to **test** our products, a number of them are linked to a user account through which you can access the products. In this case, we will use your personal data (name, surname, IP address, company details, e-mail, telephone number and the data you set up in your user account and product). How will we work with the data?

- We will set up access to the user interface through the data, so that you can test the products (Article 6(1)(b) of GDPR);
- We will communicate with you via your contact details (Art. 6(1)(b), (f) of GDPR);
- We will include your e-mail address in our Shoptet newsletter recipients list (Art. 6(1)(f) of GDPR);
- We will use the data to document the performance of our obligations under the law or under contracts (Art. 6(1)(c) of GDPR).

Such processing is allowed by the GDPR (negotiation of a contract, provision of contractual performance, or compliance with legal obligations, and legitimate interest, as the case may be). If we do not agree on further cooperation, we will stop processing your data in your user account no later than 6 months after the last communication or cancellation of the trial.

If you have tested our service, Shoptet is entitled to process your e-mail address (or telephone number) within the meaning of Section 7(3) of Act No. 480/2004 Coll., on certain information society services and on amendments to certain acts (Act on Certain Information Society Services), as amended, for the purpose of disseminating commercial communications relating to its own products or services, unless you initially refused the receipt of such communications. We will include your e-mail address in our database for 3 years from your last use of our service, but you may unsubscribe at any time.

## Do you subscribe to our products and services?

We are happy if you have entrusted us with your e-shop or subscribe to other services from us. In this case, we process your name, surname, IP address, billing data, e-mail address, telephone number, or personal data of the contact persons you provide us and data about the service inquiry/provision in order to provide the services. Why?

- We will communicate with you through this data (Article 6(1)(b), (f) of GDPR);
- We need the data for the purpose of concluding the contract itself (Article 6(1)(b) of GDPR);
- Using the data, we are able make our product or service operational (Article 6(1)(b) of GDPR);
- We are able to continuously improve our services through the data on how the services are used (Article 6(1)(f) of GDPR);
- We include your e-mail address in our Shoptet newsletter recipients list (Art. 6(1)(f) of GDPR);
- We will use the data to document the performance of our obligations under the law or under contracts (Art. 6(1)(c) of GDPR).

Such processing is allowed by the GDPR (performance of a contract, compliance with legal obligations, or legitimate interest). We will process the data for the duration of our cooperation and thereafter for 10 years after the last performance.

Unless you have prohibited us from doing so, Shoptet is entitled to process your e-mail address (or telephone number) within the meaning of Section 7(3) of Act No. 480/2004 Coll., on certain information society services and on amendments to certain acts (Act on Certain Information Society Services), as amended, for the purpose of disseminating commercial communications relating to our own products or services. We will include your e-mail address in the database for 3 years from the last use of our service, but you can unsubscribe at any time.

## Are you our business partners (suppliers)?

We are pleased with our cooperation. However, in order for us to provide our services properly, we also need to process some data (typically name, surname, e-mail address, phone number, company data, cooperation data). Why?

- We use it for the drawing up and performance of a contract (Article 6(1)(b) of GDPR);
- We will use the contact details for communication about cooperation (Art. 6(1)(b), (f) of GDPR);
- We will use it to document the performance of our obligations under the law or under contracts (Article 6(1)(c) of GDPR).

Such processing is allowed by the GDPR (performance of a contract, compliance with legal obligations). We will process the data for the duration of our cooperation and thereafter for 10 years after the last performance.

Within the framework of (e.g. affiliate) cooperation between us, some personal data of third parties may also be transferred (e.g. cookies, data on leads and conversions, delivery data etc.). In this case, we as individual data controllers are responsible for ensuring that we handle personal data correctly and securely in accordance with the GDPR. We each set up our own processes and data security, we are also aware that we are responsible for our own provision of the legal title for processing and compliance with confidentiality obligations.

## Not using our services yet but signed up to our newsletter?

Thank you for your interest. We will include your e-mail address in the newsletter recipients list on the basis of your consent (Article 6(1)(a) of GDPR). This consent is voluntary and can be withdrawn at any time. We will sign you up for a period of 3 years unless you renew your consent.

## Would you like to work for us and have you sent us your CV?

We're glad we caught your eye. If you've sent us your CV, we'll take a look at it. In this case, we will process the data you have provided in your CV and the contact details you have given us.

Such processing is allowed by the GDPR (negotiation of a contract, Article 6(1)(b) of GDPR). We will work with this data for the duration of the open selection procedure to which you respond, or for a period of 3 months (unless you respond to a specific job advertisement). If we do not agree on further cooperation, we will only continue to process your data with your consent (Article 6(1)(a) of GDPR), in case new positions open up at some point in the future. Such consent is voluntary and you can withdraw it at any time.

## Who gets access to the data?

Your personal data is safe with us and you can rest assured that we never just pass it on to anyone. Personal data is only disclosed to authorized Shoptet employees, including freelancers, who have access to the data because they help us run our company and provide our services, or to individual processors and data controllers, and only to the extent necessary to fulfil the individual purposes of the processing. The aim of these collaborations is to provide the best and most relevant services to you. Service providers may only use the data thus obtained on the basis of a data transfer agreement or data processing agreement entered into between such recipients and Shoptet.

These include:

- Freelancers involved in the development and maintenance of our products (IT, marketing, data);
- Companies involved in securing payments (payment gateways, banks);
- Providers of features and add-ons that you use in our products and services;

- E-mailing service provider (Mailchimp and Zendesk);
- Others, if any, if we agree on them as part of our cooperation.

## You should also know:

If you need to discuss anything about your personal data, please e-mail us at [info@shoptet.cz](mailto:info@shoptet.cz) or call us at 604 600 444. Our company does not have a designated data processing officer, but responsibilities for the data we process are divided in a practical way and we will address your request accordingly.

There is no so-called automated decision-making or profiling of data on our part. Personal data does not leave the territory of the European Union.

The GDPR, which regulates the area of personal data, gives you, among other things, a number of rights in connection with the processing of personal data. These include the right to:

- Access to personal data;
- Correct inaccurate and complete incomplete personal data;
- Erasure of personal data if the personal data is no longer necessary for the purposes for which it was collected or otherwise processed, or if it is established that it has been unlawfully processed;
- Restrict the processing of personal data;
- Portability of the data;
- Object, after which the processing of personal data shall be terminated, unless it is demonstrated that there are compelling legitimate grounds for the processing which override the interests or rights and freedoms of the data subject, in particular where the ground is the possible exercise of legal claims;
- Lodge a complaint with the supervisory authority, which in the Czech Republic is the Office for Personal Data Protection ([www.uoou.cz](http://www.uoou.cz)).

## In the context of our cooperation, are we the processors of the data of which you are the controller?

If Shoptet is a processor of personal data of which you are the controller in terms of the GDPR, the following terms and conditions of working with data (**processing agreement**) apply to Shoptet:

1. Shoptet may process personal data for the client that is located in Shoptet products or to which Shoptet has access for the purpose of development/ improvement/ maintenance of services for the client. This personal data is most often customer data such as name, surname, customer delivery addresses, IP addresses, contact details (phone number, e-mail address), purchase and enquiry data or purchase-related data.
2. Shoptet only processes personal data for the purpose of providing its products and services, unless we agree otherwise individually. Shoptet will process the data for the client for the duration of the provision of its Shoptet products and services in which the data is located. The data is under the control of the client and Shoptet only works with it on the basis of the client's instructions.

3. Shoptet has taken the maximum possible technical, organizational, security and other measures to prevent unauthorized or accidental access to, alteration, destruction, loss or other unauthorized use of the data.
4. Shoptet has ensured that employees and other persons authorized to process the data process the data only to the extent and for the purpose of the performance of the contract and in accordance with the legal regulations.
5. Shoptet undertakes to rectify, update, delete or move personal data (within the scope of the functionalities of the products and services) at the client's request.
6. Shoptet shall act with professional care in the performance of its obligations under the GDPR.
7. Shoptet may involve another processor in the processing of personal data, in particular a provider of IT and marketing services necessary and currently available on the market for the purpose of maintenance, operation and development of Shoptet products, which processors meet the standards set by the European Union, without additional explicit specific permission from the Client.
8. In the event of implementation of an add-on to a Shoptet product, the client acknowledges and agrees that the data will be processed by the provider of such add-on (third party) according to its terms of operation.
9. In the event of termination of the provision of Shoptet products in which personal data is located, Shoptet shall cease to actively process the personal data and shall delete the existing (backup) copies after 60 days at the latest, unless legislation requires retention of the data (e.g. due to criminal proceedings etc.).
10. Shoptet undertakes to maintain the confidentiality of the data, in particular not to disclose, disseminate or transfer it to other persons outside the employment relationship or to other authorized persons. Shoptet shall ensure that its employees and other authorized persons also observe the confidentiality obligation. This obligation of Shoptet continues even after our cooperation has ended.
11. Shoptet is also obliged to maintain the confidentiality of the security measures taken to ensure the protection of personal data, even after our cooperation has ended.