

## PRIVACY POLICY

This document contains information for data subjects regarding the processing of their personal data in the organization, within the requirements imposed on the organization, as a personal data controller, by Art. Article 13 of 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, and repealing Directive 95/46/EC (hereinafter referred to as GDPR).

### Who processes your data?

#### **Strunk Connect CZ s.r.o.**

No. 60, 542 37 Batňovice

C 33738 registered at the Regional Court in Hradec Králové

Contact e-mail: [v.kult@strunk.cz](mailto:v.kult@strunk.cz)

hereinafter referred to as "we" or "controller" or "organization"

### What is personal data?

Personal data is virtually any information that can identify a living natural person directly or its purpose is to reach such a person. Personal data can be divided into general (e.g. name and surname, age, telephone number, place of birth, marital status, etc.) and sensitive (today they are referred to as special categories of personal data, and only the following personal data are concerned – biometric data, membership in a trade union/political party, ethnic origin, philosophical beliefs, genetic data, information on convictions and criminal offences, religion, political opinions, racial origin, sexual orientation/life, health status).

### What is the processing of personal data?

Personal data processing means a systematic activity that the administrator performs with personal data for a specific purpose. The activities referred to in the previous sentence include, in particular: collection, recording, arrangement, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or any other disclosure, alignment or combination, restriction, erasure or destruction.

### Sources and categories of personal data:

The controller processes personal data (directly from you) that you have provided to him or personal data that he has obtained on the basis of the fulfillment of your order.

Your identification and contact data and data necessary for the performance of the contract.

### Lawful reason and purpose of processing

#### **The lawful basis for processing is:**

Your consent to the processing of personal data for the purpose of providing direct marketing pursuant to Article 6 para. 1 lit. a) GDPR

For the purpose of concluding and performing the contract (i.e. in accordance with the provision of our services), we process your personal data in accordance with the provisions of Article 6 para. 1 lit. b) GDPR. The legal basis for the processing of your general personal data is therefore a contract.

Once the contract has been fulfilled, we need to archive your personal data for the period foreseen by applicable law. In this case, the legal basis for the processing of your general personal data is compliance with a legal obligation, which is stipulated by Art. 6 para. 1 lit. c) GDPR.

### **The purpose of the processing of personal data is:**

Processing of your order and exercise of rights and obligations arising from the contractual relationship between you and the Controller. When ordering, the personal data necessary for the successful execution of the order is required in accordance with Art. 1 lit. b) Regulation (this is also related to the subsequent making of payment, delivery of services, handling complaints, etc.); We use the personal data you provide to us to enter into a contract with you, and if a contract has already been concluded between us, we use it to be able to perform it. The processing of the customer's personal data takes place without the customer's consent, as the legal basis for the processing of the customer's personal data for the purposes of performing the contract is a specific contract between the customer and the operator. The provision of personal data is a necessary requirement for the conclusion and performance of a contract, without the provision of personal data it is not possible to conclude a contract or to fulfil its conditions on the part of the administrator.

### **What personal data and to what extent will we process?**

In order to provide you with our services, we need to know the following personal data:

General personal data: name and surname, permanent address, address of delivery of services or goods, your telephone number and e-mail,

### **How long will we keep the data?**

We will keep your personal data for as long as we perform our contract with you. After the termination of the contractual relationship, we will store your personal data for as long as we can meet the necessary archiving obligation under the legal regulations that require archiving (these regulations are, for example, the Accounting Act, the Value Added Tax Act, the Archiving and Records Act).

### **To whom do we transfer your personal data?**

Your personal data may be transferred to the following group of persons: providers of legal, tax and accounting services, providers of technical solutions.

Your personal data may also be transferred to public authorities and courts, but only if a special legal regulation so stipulates or if you give your explicit consent.

Your personal data is always transferred to our processors on the basis of a processing agreement and in accordance with the minimum required standard of personal data protection required by the GDPR.

The Controller does not provide, publish or make available personal data to third countries

### **Privacy Policy**

The Controller declares that it has taken appropriate personal, technical and organisational measures to ensure the protection of personal data.

The Controller has taken technical measures to secure data repositories and personal data repositories in file form.

The Administrator declares that only persons authorized by the Administrator have access to personal data.

As part of the personal data processing activities that we carry out in the course of our activities, no automated decision-making or profiling takes place.

## **What are your rights in relation to the processing of your personal data?**

Under the conditions set out in the GDPR, you have:

- Right of access to your personal data in accordance with Article 15 GDPR
- Right to rectification of personal data according to Article 16 of the GDPR
- Right to restriction of processing
- Right to erasure according to Article 17 GDPR
- Right to object according to Article 21 GDPR
- Right to portability of personal data pursuant to Article 21 GDPR
- Right to withdraw consent (electronically or to a mailing address)
- The right to lodge a complaint with a data protection authority if you believe that your data protection rights have been violated.

## **How can you exercise your rights?**

### **Right of access**

Upon your request, we must inform you whether or not we process your personal data. If we process them, then you have the right to be informed of the following:

- a) for what purpose we process your data,
- b) to what extent these data are processed
- c) how long will they be kept
- d) To whom will they be made available
- e) whether you can file a complaint with the Office for Personal Data Protection.

You can submit the application electronically, to the e-mail address [v.kult@strunk-czech.cz](mailto:v.kult@strunk-czech.cz) or by post to the address: Batnovice č.p. 60, 542 37 Batňovice

### **Right to rectification**

If you believe that we process your incorrect (inaccurate) personal data, then you have the right to have it corrected. In the event that you become aware of such an inaccuracy in your personal data, please let us know and we will correct it without undue delay. You can submit the application electronically, to the e-mail address [v.kult@strunk-czech.cz](mailto:v.kult@strunk-czech.cz) or by post to the address: č.p. 60, 542 37 Batňovice

### **Right to erasure**

Under certain circumstances, you have the right to have your personal data erased. You can ask us to delete your data at any time. We will delete your personal data if:

- we no longer need your personal data for the purpose for which you provided it to us,
- you withdraw your consent,
- you object to the processing of your personal data,
- we process your personal data unlawfully,
- the personal data must be erased in order to comply with a legal obligation,
- if you are a child or parent of a child who has consented to the processing of personal data over the Internet.

### **Right to restriction of processing**

You can ask us to restrict the processing of your personal data. If we comply with your request, we will only store your personal data and will not process it further. The processing of your data will be restricted if:

- Your personal data is incorrect until we verify its accuracy,
- we process personal data unlawfully, but you do not agree with their deletion and instead request that we restrict the processing of your personal data,
- We no longer need your data, but you need it to prove, exercise or defend your rights
- you object to the processing of your personal data until we verify whether our legitimate interests override your reasons.

### **Right to data portability**

You have the right to request that we provide you with your personal data in electronic form (e.g. XML or CSV file) that allows you to easily transfer the data to another company. You can also ask us to transfer your personal data directly to the selected company. We will comply with your request if you have provided us with personal data directly and you have given us your consent to process them

### **Right to object**

**You have the right to object that we process your personal data. If we process your personal data in the following cases:**

- on the basis of our legitimate interest,
- Creating a customer profile,
- you can object to their processing if you have personal reasons to do so.

### **How can you exercise these rights?**

You can contact us with your request in one of the following ways:  
By email: [v.kult@strunk.cz](mailto:v.kult@strunk.cz) or by post to the address: č.p. 60, 542 37 Batňovice

**If you believe that your rights to personal data protection have been violated, you have the right to file a complaint with the supervisory authority, which is the Office for Personal Data Protection, at:**

Office for Personal Data Protection  
Pplk. Sochora 27170 00 Praha 7  
**Company ID: 70837627**

**Telephone:** switchboard: +420 234 665 111 (does not provide consultations) information: +420 234 665 800 (information line is available on Tuesdays and Thursdays  
From 13.00 to 15.30)

**WWW:** <https://www.uoou.cz>

**E-mail:** [posta@uoou.cz](mailto:posta@uoou.cz)

**Data box ID:** qkbaa2n

This Privacy Policy is valid and effective from: 24.04.2019

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