

PERSONAL DATA PROTECTION AND PROCESSING POLICY

In accordance with 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

This Personal Data Protection and Processing Policy (hereinafter referred to as the **"Policy"**) describes which personal data of natural persons, in particular customers (hereinafter referred to as **"Data Subject"**), are processed in the course of the activities of RONELT s.r.o., Company ID No.: 14011298, with its registered office at Výpusta 656, Želechovice nad Dřevnicí, 76311, registered in the Commercial Register maintained by the Regional Court in Brno, File No.: C126124 (hereinafter referred to as the **"Controller"**).

This Policy specifies the types of personal data we collect and process when you use our services or enter into any other contract with us, as well as the manner in which your personal data is used, shared, and protected. You will also find an explanation of the options available to you regarding your personal data and how you can contact us. We hereby inform you below about the processing of your personal data and your rights in accordance with Article 12 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"**).

Personal data refers to any information relating to 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 an identifier, such as a name, an identification number, location data, an online identifier, or to one or more factors specific to physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

PROCESSORS AND RECIPIENTS OF PERSONAL DATA

The Controller is entitled to transfer personal data to entities with whom it has entered into a data processing agreement, and who will process personal data on behalf of the Controller as its processors. Based on the above, the Controller is authorised to transfer the personal data of the Data Subject to the following entities or categories of entities:

- MANA Marketing s.r.o., Company ID No.: 07330596,

The personal data of the Data Subject may be also be disclosed to the following recipients/categories of recipients:

- suppliers of the Controller;
- employees of the Controller;
- persons in another contractual relationship with the Controller (such as providers of marketing and advertising services);

- financial institutions and insurance companies;
- public authorities in connection with fulfilment of the Controller's legal obligations as set out by the applicable legislation.

CATEGORIES OF PROCESSED PERSONAL DATA

The Controller is entitled to process, in particular, the following personal data of the Data Subject:

- address and identification data used for clear and unmistakable identification of the Data Subject (such as name, surname, academic title, date of birth, personal identification number where applicable, permanent residence address, business premises address, mailing address, company ID, tax ID) and contact details (such as contact address, telephone number, fax number, e-mail address, and other similar information);
- descriptive data (such as bank account details, payment information or credit card details, order history);
- images, photos and videos,
- account login information, including the username used online, passwords, and unique user ID;
- data provided beyond the scope of applicable laws processed on the basis of the Data Subject's consent (e.g., use of personal data for recruitment purposes, promotional purposes, etc.);
- other data necessary for the performance of the contract;
- other personal data provided by the Data Subject to the Controller.

PURPOSES AND LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA

The Controller processes the personal data of the Data Subject for the following purposes:

- a) performance of a contract, pursuant to Article 6(1)(b) of the GDPR;
- b) compliance with the Controller's legal obligations imposed by generally binding legal regulations, pursuant to Article 6(1)(c) of the GDPR (e.g., the Controller's obligation to retain accounting and tax documents);
- c) establishment, exercise or defence of legal claims of the Controller, pursuant to Article 6(1)(f) of the GDPR;
- d) sending commercial communications, pursuant to Article 6(1)(f) of the GDPR, based on the Controller's legitimate interest in direct marketing;
- e) other marketing purposes of the Controller related to the offer of products and services; including sending information about events, products, services and other activities (e.g., sending newsletters, telemarketing); contacting for market research or marketing surveys; sending greetings for Christmas, Easter, or other holidays, sending discount vouchers, gifts, and similar materials, based on Article 6(1)(a) of the GDPR.

DATA RETENTION PERIOD

Personal data will be processed only for the period necessary in relation to the purpose for which it was collected, as specified above:

- for the purpose referred to under point (a) above, personal data will be processed until the termination of obligations arising from the contract (this does not affect the Controller's right to further process such personal data to the extent necessary for the purposes referred to under points (b), (c), (d) and/or (e) above;
- for the purpose referred to under point (b) above, personal data will be processed for the duration of the relevant legal obligation of the Controller;
- for the purpose referred to under point (c) above, personal data will be processed until the end of the 4th calendar year following the expiry of the warranty period under the contract (if a quality warranty was agreed in the contract), but for at least until the end of the 5th calendar year following the termination of contractual obligations;
- in the event that judicial, administrative, or other proceedings are initiated and ongoing, in which the rights or obligations of the Controller in relation to the relevant Data Subject are being addressed, the data retention period for the purpose referred to under point (c) shall not expire before the conclusion of such proceedings;
- for the purpose of sending commercial communications as referred to under point (d) above, personal data will be processed until the Data Subject objects to such processing;
- for the purposes referred to under point (e) above, personal data will be processed for the duration of the consent granted by the Data Subject to the Controller, in accordance with a separately agreed consent to the processing of personal data. The Data Subject acknowledges that, prior to the expiration of this period, the Controller may contact them for the purpose of renewing their consent.

No later than by the end of the calendar quarter following the expiration of the processing period, the relevant personal data for which the purpose of processing has ceased, shall be destroyed (by shredding or by any other means ensuring that the personal data cannot be accessed by unauthorised persons) or anonymised.

METHOD OF PERSONAL DATA PROCESSING

The personal data is processed by the Controller. The processing takes place at the Controller's registered office by authorised employees of the Controller, or where applicable, by processors. The processing is carried out by means of computer technology, or even manually for personal data in paper form, in compliance with all security principles for the administration and processing of personal data. For this purpose, the Controller has adopted technical and organisational measures to ensure the protection of personal data, in particular measures preventing unauthorised or accidental access to personal data, their alteration, destruction or loss, unauthorised transmission, unauthorised processing, as well as any other misuse of personal data. All entities to whom personal data may be disclosed shall respect the Data Subjects' right to privacy and are obliged to comply with applicable laws and regulations regarding the protection of personal data.

No automated individual decision-making or profiling based on the provided data will take place. Personal data of Data Subjects will not be transferred to third countries (i.e. countries outside the EU and EEA).

INFORMATION PROVIDED TO DATA SUBJECTS UNDER THE GDPR

In connection with the processing of their personal data, Data Subjects have a number of rights, including the right to request from the Controller:

- access to their personal data (under the terms of Article 15 of the GDPR);
- rectification or erasure of personal data (under the terms of Article 16 or Article 17 of the GDPR);
- restriction of the processing of personal data (under the terms of Article 18 of the GDPR);
- the right to object to the processing of personal data (under the terms of Article 21 of the GDPR);
- the right to portability of personal data (under the terms of Article 20 of the GDPR);
- the right to withdraw their consent to the processing of personal data either in writing or electronically, using the postal address or email address of the Controller specified in this Policy.

If the Data Subject believes or suspects that their personal data is being processed in a manner that is contrary to the protection of their private and personal life, or in violation of applicable legal regulations, they have the right to contact the Controller with a request for an explanation and/or for remedial action. Such a request must be submitted in writing, either by sending a letter or an email to the Controller's contact details at info@ronelt.cz.

If the Data Subject's request is found to be justified, the Controller shall promptly remedy the defective situation. This does not affect the Data Subject's right to lodge a complaint directly with the supervisory authority, the Office for Personal Data Protection, Pplk. Sochora 27, 170 00 Prague 7, Czech Republic, +420 234 665 555, www.uoou.cz.

CONCLUSION

This Policy of the Controller shall apply to Data Subjects unless otherwise agreed between the Controller and a third party. The Controller reserves the right to modify this Personal Data Protection and Processing Policy at any time and in any manner. The current version will always be made available on the website www.ronelt.cz.