

Corporate Information on Data Protection

I. Initial Provisions

- (1) This Corporate Information on Data Protection is designated for data subjects whose personal data the Company processes in relation with performance of its business activity.
- (2) Protection of companies processing personal data is governed by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter as "GDPR Regulation") and by the generally binding legal regulations of the Czech Republic concerning personal data protection and/or adopted in the Czech Republic with the aim to adapt the GDPR Regulation.
- (3) The Company deals with personal data of data subjects in compliance with GDPR Regulation and does not provide this personal data to any third party without prior consent of such data subjects or only in the cases when the Company is authorized or required to do so by a legal regulation.
- (4) The personal data is processed by the Company at the security level corresponding to the nature of the particular personal data and is only accessible to the authorized persons in the Company; the only person dealing with the particular personal data is the person duly appointed to do so.
- (5) In the course of its activity the Company anticipates that personal data of any subject was disclosed to the Company in compliance with the legal regulations and is true, complete and updated.
- (6) As concerns the personal data of data subjects processed by the Company in relation with its business activity performance, the Company acts as the personal data Controller.

II. Controller's Identity and Contact Data

Company name: **AI – Namura spol. s r.o.**

Registered office: Lysolajské údolí 107/25

ID: 45795436

E-mail: gdpr@alnamura.cz

III. Contact Data of Data Protection Officer

JUDr. Libor Čihák, attorney

E-mail: poverenec@cmhl.cz

Tel.: +420 724 770 780

IV. Categories of Processed Personal Data

- (1) As the Controller the Company processes the following categories of personal data:
 - Name and surname;
 - Delivery address;

- Phone number;
- E-mail address;
- Identification number;
- Tax identification number.

(2) The Controller processes personal data of data subjects exclusively in relation with the performance of its business activity and it concerns the types of personal data the knowledge of which is needed for the Company with regard to the nature of its activity.

V. Purpose of Personal Data Processing, Legal Base for Personal Data Processing

(1) The Company processes personal data exclusively for the following purpose:

- Contract performance;
- Performance of the Company's legal obligations arising from tax legal regulations;
- Maintenance of a user account;
- Enlisting in the loyalty program and the loyalty program administration;
- Recording of purchase values;
- Direct marketing
- Profiling;
- Automated individual decision-making.

(2) The Company has established the following legal base for the personal data processing:

- Consent of the personal data subject within the meaning of Article 6(1)(a);
- Contract performance within the meaning of Article 6(1)(b) of the GDPR Regulation;
- Fulfilment of the legal obligation of a controller within the meaning of Article 6(1)(c) of the GDPR Regulation;
- Justified interest of the Company within the meaning of Article 6(1)(f) of the GDPR Regulation.

VI. Justified Interest of the Company for Personal Data Processing

The Company has based the justified interest of the Company within the meaning of Article 6(1)(f) of the GDPR Regulation on its right to perform direct marketing in relation to its customers within its business activity.

VII. Period for Personal Data Processing or Criteria Used for its Determination

The Company processes personal data for the period needed to fulfil the purpose of such personal data processing. The period for which the individual personal data is processed by the Company is set forth in special law for the individual categories of personal data and the Company duly observes

such periods.

The Company processes personal data for the following periods:

- Purchase contract term;
- For the period of 1 year from the last purchase with the aim to maintain the user account, the loyalty program, records on the purchase values and direct marketing;
- For the period of 5 years from the date of the purchase contract performance termination with the aim to fulfil the legal obligations of the Company arising from tax regulations;
- For the period of validity of the consent granted by personal data subjects.

VIII. Rights of Data Subjects

(1) Data subjects have the following rights they may enforce in relation to the Company as the personal data Controller:

- a) The data subject's right to access personal data concerning the data subject within the meaning of Article 15 of the GDPR Regulation;
- b) Ask the Company to issue a confirmation whether the personal data concerning the data subject is processed or not;
- c) The right to raise an objection with the supervisory authority, i.e. the Office for Personal Data Protection;
- d) The right for immediate rectification of any personal data concerning the data subject that is erroneous or inaccurate, or supplementing of any personal data that is incomplete within the meaning of Article 16 of the GDPR Regulation;
- e) The right for deletion of personal data concerning the data subject provided that one of the following reasons have been established:
 - The personal data is no longer needed for the purposes for which it was collected or otherwise processed;
 - The data subject recalls its consent and there is no other legal reason for processing;
 - The data subject raises objections against processing and there are no prevailing justified reasons for processing;
 - The personal data was processed illegally;
 - The personal data must be deleted to fulfil a legal obligation;
 - The personal data was collected in relation with the offer of services of an information company under Article 8(1) of the GDPR Regulation;
- f) Right for limitation of processing;
- g) Right for data portability.

(2) The Company has a notification obligation as concerns any rectification or deletion of personal data or limitation of processing.

IX. Right to Raise an Objection

(1) Based on the reasons concerning its individual situation the data subject has the right to raise an objection against processing of any personal data processed based on legal reasons:

- Processing is necessary to fulfil a task performed in a public interest or when exercising public authority that the Controller was entrusted to exercise;
- Processing is necessary based on justified interests of the competent Controller or a third party.

(2) The Controller must not further process any personal data if it fails to document significant justified reasons for such processing prevailing over the interests or rights and freedoms of data subjects or for determination, exercising or defending of legal claims.

X. Data Subject's Right to Recall its Consent with Personal Data Processing

The Company hereby notifies every data subject that in compliance with Article 7(3) of the Regulation the data subject has the right to recall its consent with personal data processing at any time. By recalling the consent legality of such processing based on the consent established before the consent recalling shall not be affected.

XI Automated Individual Decision-Making, Including Profiling

- (1) The Company hereby notifies every data subject that its performs automated individual decision-making, including profiling, i.e. segmentation and subsequent automation, mainly by sending e-mails via MailChimp.
- (2) The Company also works with cookies for anonymous data collection and with analytic tools, e.g. Google Analytics or Hotjar and applies codes for advertising systems Adwords, Sklik, Adform and Facebook.

XII Personal Data Receivers

- (1) The Company hereby notifies data subjects that personal data may be disclosed to some of the following personal data receivers:
 - The Company's employees and the persons performing work for the Company based on agreements on activities performed outside the scope employment;
 - Public authorities upon performance of the statutory obligations by the Company;
 - Person procuring legal services for the Company;
 - Person procuring services in the field of digital marketing for the Company;
 - Person procuring accounting services and tax consultancy for the Company;
 - Transport companies with the aim of parcel delivery for the Company;
 - Marketing companies with the aim to arrange for competitions organized by the Company, management of marketing campaigns for the Company and profile management at the Company's social networks;
 - The Mailchimp Software provider;
 - The custom-tailored e-shop solution.
- (2) The Company does not transfer personal data of data subjects to any third countries.

XIII. Processing Security

- (1) The Company notifies the data subject that in relation to the personal data processing performed by the Company it is aware of the following risks:
 - Accidental or illegal destruction;

- Loss;
- Alteration;
- Unauthorized disclosing.

(2) The Company maintains all suitable technical and organizational measures to ensure security of the personal data processing at the level corresponding to the risks specified above, mainly:

- Securing of continuous confidentiality, integrity, availability and resistance of the systems and processing services;
- Securing of the capacity to recover availability of and timely access to personal data in the case of any physical or technical incidents;
- Securing of regular processes of testing, evaluation and assessment of efficiency of the implemented technical and organizational measures to ensure the processing security.

XIV. Exercising of Rights of Data Subjects

The rights of data subjects in relation to the Company may be exercised or any objections in relation to the data subject's personal data raised in writing at the Company's registered office or electronically at the following e-mail address: gdpr@alnamura.cz .