

## INFORMATION ON THE PROCESSING OF PERSONAL DATA

Act No 110/2019, on the processing of personal data (hereinafter the "Act")

### I. Personal data controller

**Zooke s.r.o.**, with its seats: Klimentská 34, Prague 1, 110 00, ID: 26001217, tel: +420 461 530 983, ID data box: 6tf835r (hereinafter „company“ or „data controller“), as the personal data controller<sup>1</sup>, hereby informs on the basis of this Act about the manner and scope of processing of personal data, including the scope of the rights of data subjects related, unless otherwise specified by the Act, the provisions 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 (General Data Protection Regulation) – (hereinafter the "GDPR").

### II. Scope of personal data processing

Personal data are processed to the extent that the relevant data subject has provided them to the controller in connection with the conclusion of a contractual or other legal relationship with the controller, or which the controller has otherwise collected and processes in accordance with applicable legal regulations or to fulfil the controller's legal obligations under the Act.

### III. Sources of personal data

Directly from the subjects providing personal data voluntarily (email communication, registration, telephone, business cards, social networks, personal mediation, inbox, actions on webpages, etc.) and these sources are the basic prerequisite not only for the conclusion or modification of the contract in question, but also serve primarily for the unambiguous and unmistakable identification of data subjects, which are determined by generally binding regulations, as the necessary prerequisites for the negotiation of the parties and statutory compliance;

### IV. Categories of personal data subject to processing

- identification data used to uniquely and unmistakably identify the data subject (e.g. name, surname, title, personal identification number where applicable, date of birth, permanent address, Company ID, Tax ID, ID card) and data enabling contact with the data subject (contact data – e.g. contact address, telephone number, fax number, email address and other similar information, e.g. for the delivery of our communications).
- contact data is, in particular, a contact or delivery address, telephone number, e-mail address, etc. Contact data is thus personal data on the basis of which we are able to contact you. Data on drawing/purchasing service products, this is data about what services we provide you use. More detailed information regarding the specific categories of personal data that we process can be found in the text of the document, in which you either grant us consent to the processing of personal data, or in which we inform you about the processing of personal data when selling a product or service based on our contractual or legal obligation, or on the basis of legitimate interest.
- descriptive and authentication data (e.g. bank connection or login/registration data), other data necessary for the performance of the contract/delivery, data provided beyond the scope of relevant laws processed within the framework of the consent granted by the data subject (photo processing, use of personal data for personnel purposes management etc.)
- behavioral data on our website (more information is provided in the published document Principles of working with cookies, published on the websites: [www.zooke.cz](http://www.zooke.cz); [www.zooke.eu](http://www.zooke.eu); [www.bikeporn.cc](http://www.bikeporn.cc); [www.bikeporn.cz](http://www.bikeporn.cz); [www.freshtrash.cc](http://www.freshtrash.cc); [www.sensor.cz](http://www.sensor.cz).

### V. Categories of the data subject

- an employee of the controller, an external collaborator (natural persons, both those pursuing business and not pursuing business), a carrier, a service provider, a public contract supplier, another person who is in a contractual relationship with the controller, as well as a job applicant;
- natural persons, in particular: users of services and mobile applications, readers, natural persons residing in the Czech

Republic and abroad (in particular, records and inspections of the controller's agendas), subscribers, and other data subjects.

### VI. Categories of personal data recipients

- public administration bodies (police, bailiffs, general financial directorate) or State and other authorities in the performance of their statutory duties under the relevant legislation and/or based on your written approval of processing personal data;
- public institutions and financial and insurance institutions;
- persons responsible for postal and email distribution, if any;
- persons providing IT administration and technical processing operations (suppliers of information systems and applications) and other processors of the controller or controllers under joint controllership;
- other possible beneficiaries in the Czech Republic, abroad, EU countries.

More detailed information regarding processors and recipients of personal data can be found in the text of the document, by which you either grant us consent to the processing of personal data, or by which we inform you about the processing of personal data during the provision/sale of our product or a specific service based on our contractual obligation, or on the basis of an authorized of interest.

### VII. Purpose of personal data processing

- the purposes contained within the consent provided by the data subject;
- sale of goods and services incl. partner networks;
- setting up a virtual account/registration in a business tool (eshop);
- registration to the loyalty program and possible registration to receive news, newsletters, participation in campaigns or competitions;
- recruitment;
- conclusion and fulfillment of the lease agreement according to Act No. 89/2012, Civil Code. negotiations on the contractual relationship, performance of the contract
- internal administrative needs and internal record keeping and protection of the rights and interests of the controller, the recipient or other persons concerned (e.g. recovery of claims, damages, administrative proceedings under special regulations, creation of statistics), archiving conducted on statutory basis, selection procedures for vacancies, fulfilment of legal obligations by the controller and on the basis of its legal activities, protection of the vital interests of the data subject, improvement of the controller's website and services based on their use.

### VIII. Method of processing and protection of personal data

It is carried out only at the workplaces, branches and headquarters by employees of the controller as a processor using computer technology, or manually for personal data in paper form, in compliance with all security principles and technical or organisational measures for the management and processing of personal data.

### IX. Period of processing of personal data

In accordance with the time limits set out in the relevant contracts, in the controller's filing and shredding rules or in the relevant legislation, this is the time necessary to secure the rights and obligations arising from both the contractual relationship and the relevant legislation, which the controller is bound to observe.

### X. Advice

The Controller processes data with the consent of the data subject, except in cases provided by law where the processing of personal data does not require the consent of the data subject within the meaning of the Act, unless otherwise provided for as a result of statutory Exceptions or the GDPR.

In accordance with the Act and further based on Article 6(1) GDPR, the controller may process the following data without the consent of the data subject:

- the data subject has given consent for one or more specific purposes;
- processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- processing is necessary for compliance with a legal obligation to which the controller is subject;
- processing is necessary in order to protect the vital interests of the data subject or of another natural person;

<sup>1</sup> The data controller determines for what purpose and by what means personal data will be processed, collected, recorded and sorted or disclosed, and the controller is responsible for the proper implementation of such processing of your personal data.

- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

#### **XI. Technical and organisational measures for the security of personal data of data subjects**

1. In particular, the controller has adopted and maintains the following measures to ensure security of personal data:

- all persons who will be granted access to personal data have been or will be informed of their obligations and properly trained by the controller in the processing of personal data before such access is granted;
- the functionality and effectiveness of the measures to ensure the security of personal data are regularly and to the necessary extent checked by means of self-auditing and review activities in the area of measures and documentation;
- the making of records to identify and verify when and by whom personal data were recorded or otherwise processed;
- encryption and/or anonymisation of personal data;
- the ability to ensure the continued confidentiality, integrity, availability and resilience of processing systems and services, given the technical measures in place and their regular review;
- the ability to restore the availability of personal data;
- a process for regularly testing, assessing and evaluating the effectiveness of measures for ensuring the security of the processing;
- the ability to protect the integrity of communications networks;
- antivirus protection and unauthorised access control;
- secure data transmission that allows unambiguous identification of the recipient through instruments;
- when processing personal data, the data will be stored exclusively on secure servers or on secure data carriers if they are in digital form.

2. The controller continuously implements additional safeguards for the technical and organisational security of personal data, in particular measures to prevent unauthorised or accidental access to personal data, accidental or unlawful destruction, loss, alteration or unauthorised disclosure (hereinafter the "personal data breach"), at its discretion and taking into account the state of the art.

#### **XII. Rights of the data subject**

1. The basic and essential particulars of the requests for exercising the rights of data subjects are published in the document "Particulars for exercising rights", published on our websites.

2. In accordance with Section 28 of the Act, the controller shall inform the data subject, upon request, of the right to access personal data and the following information:

- the purpose of the processing, the category of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, the intended period for which the personal data will be stored, any available information about the source of the personal data;
- if not obtained from the data subject, information whether automated decision-making, including profiling, is taking place, advice on the right to request rectification, restriction of processing or erasure of personal data and the source of the data.

3. Any data subject who discovers or suspects that the controller or processor is carrying out the processing of his or her personal data which is contrary to the protection of the data subject's private and personal life or contrary to law, in particular if the personal data are inaccurate with regard to their purpose of processing, can:

- ask the controller for an explanation, and demand that the controller remedy the situation. In particular, this may involve blocking, correcting, supplementing or deleting personal data;
- if the data subject's request in accordance with paragraph 1 is found to be justified, the controller shall rectify the defective situation without delay;

- if the controller fails to comply with the data subject's request in accordance with paragraph 1, the data subject has the right to apply directly to the supervisory authority, the Office for Personal Data Protection, with its seat at: Pplk. Sochora 27, 170 00, Praha 7, tel. 234 665 800 or via email at: [posta@uoou.cz](mailto:posta@uoou.cz) ;
- the procedure referred to in paragraph 1 does not preclude the data subject from submitting his or her complaint directly to the supervisory authority;
- the controller has the right to charge a reasonable fee for the provision of information, not exceeding the costs necessary to provide the information;
- contact details of the company: Milan Jurka, email: [mj@zooke.cz](mailto:mj@zooke.cz), or the controller's seat.