



PERSONAL DATA PROCESSING POLICY

We attach great importance to protecting your personal data and privacy rights on the Internet. Please read our privacy policy. Our goal is to explain to you how we handle your personal information, what information we store and how we use it.

1. Information on the processing and protection of personal data

1.1 The protection of your personal data is very important to us and we always comply with the relevant legislation and international standards.

1.2 In connection with the adoption 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 (GDPR), which applies to the processing of your personal data by our company OptoNet Communication, spol. s r.o. with effect from 25 May 2018, ID No. 27750132, with registered office at Červený Kříž 250, 586 01 JIHLAVA, registered in the Commercial Register maintained by the Regional Court in Jihlava under file No. C 12970 (hereinafter referred to as the "**Company**" or also "**we**"), we provide you below with a summary of basic information about the processing and protection of your personal data by the Company.

2. What personal data we process and how we obtain it

2.1 The personal data we process about you, the scope of which varies depending on the purpose and services provided:

2.1.1 For the purpose of concluding and administering the contract and the execution of the delivery

- (a) Identification data (name, surname, address)
- (b) Contact details (e-mail, telephone number)
- (c) Company name, registration number, registered office (if you are an entrepreneur).

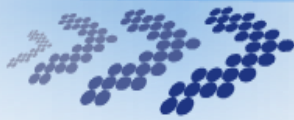
2.1.2 To improve our services and offerings

- (a) Data about your visit to our website (cookies, IP address)
- (b) Information about your purchasing habits and use of our services, such as the date/price and name of the products purchased, including related communications with you.

2.1.3 For marketing purposes, including sending commercial communications and personalising advertising

- (a) Data about your visit to our website (cookies, IP address)
- (b) Contact details (e-mail, telephone number)
- (c) Information about your purchasing habits and use of our services, such as the date/price and name of the products purchased, including related communications with you.

2.2 We collect personal data primarily directly from you (in particular when you enter into a contract and during the contractual relationship) and also on the basis of your visits to our website (see cookies section below).



3. How we use your personal data

3.1 We use your personal data mainly for the following purposes:

- (a) to enter into a contract and execute your order;
- (b) communicating with you and managing our contractual relationship;
- (c) analysing, evaluating and improving our customer service;
- (d) resolving your complaints and claims;
- (e) the performance of our legal obligations; and
- (f) your consent to keep you informed of changes and updates to the products and services we provide and our personalised offers.

3.2 If necessary for the conclusion and performance of the contract or to protect our legitimate interests related to the conclusion or performance of the contract, based on your consent or if permitted by law, which also provides for the protection of your rights, we use technology, in particular, to create customer profiles for the above purposes.

3.3 We will only retain your personal data for as long as any of the above processing purposes continue and thereafter only for the time and under the conditions in accordance with applicable law.

3.4 In the case of consent for marketing purposes (including profiling for the purpose of offering suitable goods and services and processing cookies, if applicable), this period is [5] years from the date of consent or its renewal. In other cases, the processing period is based on the purpose of the processing or is determined by law.

4. Legal basis for processing your personal data

4.1 The legal basis that allows us to process your personal data depends on the purpose for which we process the personal data. Therefore, in a particular case, we may process your personal data without your consent because:

- (a) it is necessary for the purpose of entering into or performing a contract with you;
- (b) it is necessary to comply with our legal obligations (e.g. accounting and tax);
- (c) it is necessary for the protection of our legitimate interests (e.g. in connection with the exercise of claims under contracts or in connection with the analysis and improvement of our services);

4.2 With your consent, we may process your personal data for marketing purposes, i.e. to offer our products, to inform you about new products or other commercial communications, by sending it to your email address and by using personalised marketing and remarketing. You may withdraw your consent to this use of your personal data at any time by sending your withdrawal information to our email address info@optonet.cz or in writing to the Company at the above address or via our online tool - [I WANT TO CHANGE CONSENT](#).

5. Who we provide your personal data to

5.1 We may disclose your personal data:



(a) service providers who provide their services to us in connection with our business, in particular carriers, your payment intermediaries, persons assisting us with the administration of contracts and claims for performance by you or who print and deliver documents;

(c) to other persons in accordance with applicable law (e.g. notifications to the tax authorities in cases provided for by law, to the police in the context of criminal investigations, etc.).

5.2 Your personal data may be transferred to and stored within countries within the European Economic Area ("EEA") that are considered to have a comparable level of personal data protection to the Czech Republic as well as to entities based outside the EEA, which include companies within the Merkuria CB s.r.o. group and providers of information or other services. In the case of transfers outside the EEA, we will ensure the protection of your data through the conclusion of appropriate contractual clauses or other appropriate safeguards in accordance with the GDPR.

6. What are COOKIES and how do we use them?

6.1 Cookies are small data files that are necessary for the proper functioning of the website and which we, therefore, place on your computer, as do most websites. They are text files that websites store on your computer or mobile device when you start using the website.

6.2 The website will remember for a certain period of time the actions and settings you have made on the website, e.g. the contents of your shopping cart. You do not have to enter this information again when you visit the site again and move between different sections of the site.

6.3 We also use cookies to collect statistical data and personalise advertisements so that we can further improve our site and improve the services we offer. We, therefore, share information about your use of our website with our advertising and analytics partners, specifically Google. You can read more about how Google handles cookies at <https://www.google.com/policies/technologies/cookies/>.

6.4 If you object to the use of cookies and data collected through our website that uses cookie technology for the purposes set out above, you have the option to:

(a) block the use of cookie technology by setting your internet browser or other computer programs accordingly (i.e. set your internet browser or other computer programs to block or disable/disallow the use of cookie technology); or

(b) You may also withdraw your consent free of charge, either by sending an email to info@optonet.cz, by sending a letter to the address of the Red Cross 250, 586 01 JIHLAVA, or by using the online tool for changing your consent - [I WANT TO CHANGE MY CONSENT](#).

7. What are your rights?

7.1 In particular, you have the following rights in relation to the processing of your personal data:

(a) the right to clear, transparent and understandable information about how we use your personal data and what your rights are;

(b) the right of access to personal data and the provision of other information related to its processing by the Company;

(c) the right to rectification of incorrect and incomplete personal data;



(d) the right to have your personal data erased, in particular, if (i) it is no longer necessary for further processing; (ii) you have withdrawn your consent to its processing; (iii) you have legitimately objected to its processing; (iv) it has been processed unlawfully; or (v) it must be erased by law;

(e) the right to restrict the processing of your personal data where (i) you challenge the accuracy of the personal data for as long as we do not verify its accuracy; (ii) the processing is unlawful; (iii) we no longer need the data but you need the data for the purposes of pursuing your legal claims; or (iv) you object to the processing of the data for as long as we do not verify whether our legitimate grounds outweigh your interests;

(f) the right to object to the processing of your personal data where we process it (i) for direct marketing purposes or (ii) for the purposes of our legitimate interests;

(g) the right to obtain your personal data and transfer it to another service provider;

(h) the right to lodge a complaint with the Office for Personal Data Protection, Pplk. Sochora 27, 170 00 Prague 7; www.uoou.cz

7.2 If you wish to exercise any of the above rights, please contact us using the contact details below.

8. How we protect your personal data

8.1 To ensure the security and confidentiality of your personal data, which is extremely important to us, we use technical and organisational measures, in particular, to protect against unauthorised access to and misuse of data, to ensure the security of our IT systems and to recover data in the event of an incident. Where appropriate, we use encryption to protect your data. We regularly evaluate and update all measures.

8.2 The processing of personal data is carried out manually and in electronic information systems, which are subject to physical, technical and procedural controls. To protect data, we have a security mechanism in place including technical, organisational and personnel measures and we require the same level of protection from our processors.

9. Need more information or want to exercise your rights

9.1 In addition to the web address <https://www.optonet.cz/zasady-zpracovani-osobnich-udaju.html>, the full version of the Privacy and Data Protection Policy is available at the Company's brick-and-mortar store. You may request a written copy in the manner set out below.

9.2 If you have any questions regarding the processing of your personal data, need any other related assistance or wish to exercise your rights, please contact the Data Protection Officer by telephone (during business hours) at +420 564 040 152, electronically by e-mail at info@optonet.cz or in writing at the Company's address above. You can also use automated tools to [change your consent](#) or to obtain a [statement of the personal data recorded](#).