

DATA PROCESSING POLICY

INTRODUCTORY INFORMATION

Controller:

RESPILON Group s.r.o., Company ID No.: 29245770, with registered office at Cejl 480/12, Zábřovice, 602 00 Brno, registered in the Commercial Register administered by the Regional Court in Brno, Section C, File 68120 (hereafter only as the “Controller” or the “Company”).

Controller’s contact details:

Delivery address: Cejl, 480/12, Zábřovice, 602 00 Brno, e-mail address: hr@respilon.com.

The Company hasn’t authorized a representative with regard to personal data protection.

LEGAL BASIS

The Company processes your personal data in accordance with the law of the EU, including but not limited to 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, hereafter only as “**GDPR**”), further in accordance with international conventions which are binding for the Czech Republic, including but not limited to Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data No. 108, published under No. 115/2001 Coll. I. A. (collection of international agreements), and further in accordance with the Czech law, mainly with Act No. 101/2000 Coll., on personal data protection and on amendments to certain acts, as amended (hereafter only as the “Act”).

The legal basis for the personal data processing is that the processing **is necessary for an agreement completion between you and the Company** or so that measures can be taken prior to the conclusion of such an agreement in accordance with Article 6 (1) (b) of GDPR as amended.

If there is a legal relation, the Company delivers commercial communications concerning goods shown and services provided by the Company on the Company’s website to their customers as a result of the **Company’s right to limited direct marketing**. The Controller therefore does not require your consent to the delivery of the commercial communications but you can unsubscribe from the Company’s newsletter, or you can object to such processing.

In case of direct marketing, if there is no legal relation, the Company may process your personal data only **on the basis of your consent**.

If you use cookies, the Company processes your data from when you access our website shop.respilon.com, when you browse our products or do some other activity on our website, for better advertisement and promotion targeting. Processing of information acquired by the use of marketing cookie files is possible only **with your consent to the use of the cookies**.

WHAT DATA WE PROCESS

We process your personal data as customer data which you provide during the placing of an order on our e-shop website shop.respilon.com: your first name, your surname, address, phone number, e-mail address.

With regard to information provided in our contact form on our webpage shop.respilon.com the only data being processed is: e-mail address, first name and surname.

If you **configured the accepting of cookies in your browser and consented to their use**, the Company will have access to your data from when you access our website, browse our products or do some other activity on our website.

Personal data of a special category (sensitive data) is not processed by the Controller.

FOR WHAT PURPOSES WE PROCESS YOUR PERSONAL DATA

On the basis of the providing of our services, the Controller processes and stores your personal data in accordance with applicable law, including but not limited to the provisions of Art. 6 (1) (a) and (b) of GDPR, for the following purposes:

- to contact you and to provide you with requested information (your e-mail address is used);
- to perform the agreement (your name, surname, address, e-mail address and phone number is used for a shipper);
- to administer our direct marketing database (your name, surname, address, phone number and your e-mail address);
- direct marketing on the basis of your consent (your e-mail address is used).

FOR HOW LONG WE WILL PROCESS YOUR PERSONAL DATA

Your personal data will be processed for the time necessary to ensure mutual rights and obligations resulting from a legal relation, **that is for the time of the processing of your order** including the payment for and the delivery of goods.

If you have filled in the contact form on our website, your personal data will be processed for the time necessary to contact you and to provide you with requested information.

Commercial communications are delivered **for the time for which you consent to such delivery**. If you are a customer, we will be delivering you our commercial communications until you unsubscribe or until you object to the processing of your personal data for such a purpose. The longest time of the delivery of commercial communications is five (5) years. Then the Company will request your consent again.

The data acquired for marketing purposes via using cookies will be processed **during the time for which you consent to the use of cookies** which is for the time when you consent to accepting cookies in your browser, or until you object to the processing of your personal data for such a purpose.

Further personal data processing beyond what has been stated so far is done only when it is **necessary for the performance** of the Company obligations **that result from applicable law**.

After there is no purpose for personal data processing or when the Controller does not have a legal reason to process your personal data, the Controller must delete it.

FURTHER INFORMATION ON PERSONAL DATA PROCESSING

Your personal data is processed manually by our employees.

Your personal data will be further processed by the following data processors:

- processors who provide services connected with servers, network, cloud or IT services for the Controller;
- in case of the delivery of goods – shipping services;
- entities cooperating with the Controller if it is necessary for the administration purposes and for the purposes of professional services for customers;
- third parties which assist in the providing of services or information;
- an external accountant and a wage department.

YOUR RIGHTS

You have the right:

- **to acquire a confirmation** from the Controller whether or not your personal data is being processed and if so, whether you may access your personal data.
- **to a correction of incorrect personal data**, or, with regard to the processing purposes, you have the right to complete your personal data also by providing an additional statement;
- **to the deletion of your personal data** if your data is no longer necessary for the processing purposes, if you have withdrawn your consent to the data processing, if you have objected to such processing and there are no substantial legal reasons for such a processing;
- **to limit the data processing** if you have denied the correctness of your personal data and to do so for the time necessary to verify its correctness, if the Controller does not need your personal data for the processing purposes but you require the data to determine or back your legal claims, or if you have objected to the processing of your personal data;
- **to withdraw your consent** to process your personal data without any penalty. You can withdraw your consent by any aforementioned means. If you wish to withdraw your consent, please contact the Controller on addresses listed above under Controller's contact details. The withdrawal of consent shall not affect the lawfulness of processing resulting from the consent given before its withdrawal;
- **to file a complaint with a relevant supervisory authority** if you believe that the processing of your personal data has been unlawful. The relevant supervisory authority in the Czech Republic is the Office for Personal Data Protection;
- **to object** to the processing of your personal data.

SECURITY

The Controller represents that he treats your personal data in accordance with applicable law. Your personal data is secured by the Controller by means of implemented technical and organizational measures.

All personal data in an electronic form is stored in databases and systems which are accessed only by individuals who need to treat your data directly for purposes stated herein, and they must do so only to the extent necessary. Access to your personal data is protected by a password and a firewall.

EFFECT

The data processing policy comes into effect on 25th of May 2018.