

## PRIVACY POLICY

### I. General Information

- (a) The personal data controller referred to in Article 4 (7) of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the "GDPR") is NeuronSW SE, Company Registration Number (IČ): 07967373, having its registered office at Škrétova 490/12, Praha 2, 120 00, registered in the Commercial Register kept by the Municipal Court in Prague, file number H 2231 / MSPH (hereinafter referred to as the "Controller").
- (b) The Controller's contact details are:  
**Address:** Škrétova 490/12, Praha 2, 120 00  
**E-mail:** sales@neuronsw.com  
**Phone:** (+420) 604 182 351
- (c) Personal data means any information relating to an identified or identifiable natural person; an identifiable natural person is one 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 the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- (d) The Controller has not appointed a Data Protection Officer.

### II. Sources and Categories of Processed Personal Data

- (a) The Controller processes personal data that you have provided to them, or personal data that the Controller has received in connection with your purchase order.
- (b) The Controller processes your identification and contact details and the data necessary for the performance of the contract.

### III. Legal Bases and Purposes for Processing Personal Data

- (a) The legal bases for processing personal data are:
  - performance of the contract between you and the Controller, pursuant to Article 6 (1) b) of the GDPR
  - the legitimate interests pursued by the Controller in providing direct marketing (in particular for the purpose of sending commercial messages and newsletters), pursuant to Article 6 (1) f) of the GDPR
  - your consent to processing for the purpose of providing direct marketing (in particular for sending commercial messages and newsletters), pursuant to Article 6 (1) a) of the GDPR in conjunction with Section 7 (2) of Act No. 480/2004 Coll. on certain Information Society Services in the event that no order has been placed or no services have been requested
- (b) The purposes for processing personal data are:
  - processing your order and performing the rights and obligations arising from the contractual relationship between you and the Controller; when placing an order you need to provide personal data necessary for processing the order (i.e. name, address, phone and email); the provision of personal data is a necessary requirement for the conclusion and performance of the contract – unless the data subject provides personal data it is not possible to conclude the contract or to fulfil it by the Controller

- sending commercial messages and conducting other marketing activities
- (c) The Controller adheres to automated individual decision-making within the meaning of Article 22 of the GDPR. You have given your explicit consent to such data processing.

**IV. Purposes for Data Processing, Categories, Data Sources and Data Recipients**

LEGAL BASIS	PURPOSE	DATA	SOURCE	DATA RECIPIENTS (PROCESSORS)
Performance of a contract	Processing an order and responding to a price request sent via a contact form	Clients' personal data (contact details)	Emails, Contact Form, Telemarketing	Subcontractors, email service providers, cloud storage providers, printed documents
Legitimate interests	Direct marketing (especially for the purpose of sending commercial messages and newsletters)	Clients' contact details	Purchase orders, Contact Form, telemarketing	Email service providers, cloud storage providers, subcontractors, websites
Consent	Marketing and website promotion	Emails, names of potential clients, IP addresses and other technical identifiers	Newsletter subscription form	Web hosting service providers and transactional email service providers
Consent	Retargeting	For a period of up to 38 months: third-party cookies, IP addresses, information about the user's browser and web browsing behaviour	The user's visits to particular webpages	Advertising platforms enabling retargeting (AdWords, Sklik, Facebook LinkedIn, Twitter, Youtube)
Consent	Obtaining demographics through web traffic data	Third-party cookies, demographics (age, gender, interests, interest in purchasing a product and other categories)	DoubleClick cookie file, Android advertising ID, Identifier for Advertisers (IFA)	Google Analytics Lucky Orange

**V. Data Retention Periods**

The Controller will retain personal data:

- for the time necessary to exercise the rights and obligations arising out of the contractual relationship between you and the Controller and the exercise of claims under these contractual relationships (for 15 years from the termination of the contractual relationship)
- until the consent to the processing of personal data for marketing purposes is withheld (for a maximum of 10 years if personal data is processed on the basis of consent)

(a) At the end of the retention period, the Controller will erase the data subject's personal data.

## VI. Personal Data Recipients (Controller's Subcontractors)

(a) The recipients of personal data are persons:

- involved in the supply of goods / services / processing payments on the basis of a contract
- providing marketing and sales services

Google	US	Internet users' browsing behaviour, online advertising on the AdWords network and Google Analytics
Seznam.cz	CZ	Online advertising on the Sklik network
Hubspot	XX	CRM system
Wordpress	XX	Web content management system
LinkedIn	US	Online marketing
Facebook	US	Online marketing
Twitter	US	Online marketing
Česká pošta	CZ	Shipping of orders
DHL	CZ	Shipping of orders
UPS	CZ	Shipping of orders

## VII. Cookies

- (a) When you visit our website, your personal data is processed by the Controller via cookies. The purpose of this processing is to obtain information about website traffic and the use of our website by customers.
- (b) If a customer does not want to receive cookies, they can delete all cookies from their computer's disk through browser settings, disable cookies, and can also enable notifications informing them every time a cookie file is about to be stored on their device.

## VIII. Your Rights

(a) Under the terms of the GDPR you have:

- the right to access your personal data, under Article 15 of the GDPR
- the right to obtain the rectification of your personal data, pursuant to Article 16 of the GDPR, and the right to obtain from the Controller restriction of processing, under Article 18 of the GDPR
- the right to erasure of your personal data, under Article 17 of the GDPR
- the right to object to processing of your personal data, under Article 21 of the GDPR
- the right to data portability, under Article 20 of the GDPR

- the right to withdraw consent to the processing of your personal data, in writing or electronically to the address or email address of the Controller provided in Article III of this Privacy Policy
- (b) In addition, you have the right to file a complaint with the Personal Data Protection Office if you believe that your privacy has been violated.

#### **IX. Protecting Your Information**

- (a) The Controller declares that they have taken all appropriate technical and organisational measures to safeguard your personal data.
- (b) The Controller declares that they have taken technical measures to secure their data storage facilities and repositories for personal data in paper form.
- (c) The Controller declares that your personal data can only be accessed by persons authorised by the Controller.

#### **X. Final Provisions**

- (a) By placing an order through our online order form, you acknowledge that you have read, understand and agree to our Privacy Policy and that you accept it in its entirety.
- (b) You consent to the terms of our Privacy Policy by ticking the consent checkbox on our online form. By ticking the consent checkbox, you acknowledge that you have read, understand and agree to our Privacy Policy and that you accept it in its entirety.
- (c) The Controller reserves the right to alter these terms. New versions of this Privacy Policy are published on the Controller's website and sent to the email address that you have provided the Controller with.

This Privacy Policy comes into effect on 25<sup>th</sup> May 2018.

In case of discrepancies between the Czech and English version of this Privacy Policy, the Czech version shall prevail.