

# Privacy Notice

We take data protection and privacy very seriously and comply with applicable national and European data protection provisions. Below we provide the most important information about how we collect, process and use, including (and in particular) what information and personal data we keep and what we do with it.

## 1. Controller

The person responsible for the collection, processing and use of your personal data on this website is, in accordance with the General Data Protection Regulation (General Data Protection Regulation, "GDPR"), **Klára Holanová, V Horní Stromce 2300/7, Praha 3, IČO: 61471763**

## 2. Collection, processing and use of personal data

### 2.1. Personal data

Personal data is defined as any information relating to an identified or identifiable natural person (Art. 4 (1) GDPR).

This shall include, in particular, your name, email address, telephone number, address, date of birth, as well as various inventory data that you provide in the framework of an online order, a registration, the creation of a customer account or a query submitted via the contact form (hereinafter referred to as "Personal Data").

Statistical data which we collect for technical reasons when you visit our website, and which is anonymized and thus cannot be linked to your person directly, shall not be covered by this Privacy Notice. Such statistical data shall include information on your number of visits to our website, the time that you spend on our website, the pages which you visit, information on your browser(s), IP address, software and hardware characteristics. This information shall be collected and handled anonymously in order to obtain information on the use of our website and optimise it accordingly.

### 2.2. Collection, Processing and Use of Your Data

In general, it is possible to use our websites without entering any Personal Data. Insofar as our webpages collect any Personal Data, this shall occur on a voluntary basis wherever possible.

In detail, we collect and process the following categories of Personal Data for the following purposes:

2.2.1 For our business relationship | We will collect and process your name, address, purchasing history and similar required Personal Data to handle the business relationship between us, for example to answer your query, to process the agreement made with you, to deliver any ordered goods, to process payments or for technical administration purposes. The legal basis for the processing is Article 6 (1) lit. b GDPR as it is necessary for the performance of contracts with you. We may have received your data via an email address mentioned on our website or through our website's contact field.

We will retain this Personal Data for the period of time that our business relationship lasts. If there have not been transactions between us for three years, we delete or anonymise your Personal Data, unless we are required by law to store it for a longer period.

2.2.2 Create a profile | When you contact us for the first time via email or through our website's contact field or when participating in a promotion such as registering a product for additional guarantee, we create a profile for you in our database. All further Personal Data, which you subsequently submit to us, e.g. via purchases or customer service contact, will also be saved on your profile. The legal basis for this processing is Article 6(1) lit. b GDPR as it is necessary for the performance of contracts with you. We may also use your Personal Data to find other potential customers like you and we do this on the basis of our legitimate interests under Article 6(1) lit. f GDPR.

We will retain this Personal Data for the period of time that our business relationship lasts. If there have not been transactions or customer service contacts by you for three years, we delete or anonymise your Personal Data, unless we are required by law to store it for a longer period.

### 2.2.3 Newsletter subscription & analysis of newsletter use

a) Subscription | If you subscribe to our email mailing list, we shall use the Personal Data submitted by you with your consent for sending email newsletters to you. You must submit your email address in order to register. Any further information shall be submitted on an entirely voluntary basis and used in order to address you better in the newsletter or to tailor the newsletter content to your interests. The newsletters will contain current news and information about our products as well as general advice and information regarding matters revolving around our products. The legal basis for this processing is your consent pursuant to Article 6(1) lit. a GDPR.

We will retain your Personal Data for this purpose either (i) until you unsubscribe or (ii) for a maximum of 18 months if you have not opened any newsletter. We will then delete or anonymise your Personal Data, unless we are required by law to store it for a longer period.

You may withdraw consent by unsubscribing from our email newsletters at any time, without reason and with immediate effect. You can unsubscribe via the unsubscribe link at the bottom of our email newsletters or by using our contact form.

b) Analysis of newsletter use | We continuously seek to improve our service. With this in mind, we carry out an evaluation of the sent email newsletters, e.g. whether the submitted email addresses are available, whether the newsletter has been opened, which links in the newsletters have been used and whether there is any response or return ((automatic) reply, error message etc.). The legal basis for this processing is your consent pursuant to Article 6 (1) lit. a GDPR.

We will retain your Personal Data for this purpose for two years. We will then delete or anonymise your Personal Data, unless we are required by law to store it for a longer period.

2.3 Consent of minors | Persons aged under 16 may not submit any Personal Data to us without the prior consent of their parents or legal guardian.

2.4 Where you consent: Right to withdraw consent | Where your consent is the legal basis for the processing of your Personal Data, you can withdraw your consent at any time without reason. Please note that withdrawing your consent will not affect the lawfulness of the processing before the withdrawal.

### 3. How share your personal data with third parties

Your Personal Data shall only be transferred to third parties in the following cases:

- to our suppliers or service providers such as our customer support service provider or our distribution partners in connection with your use of the website;
- to social media companies in order to assist us to identify potential customers;
- to our PR agency listed as the press contact for handling press related requests;
- to our IT agencies which provide IT services to us and which process such data only for the purpose of such services (e.g. hosting or IT maintenance and support services, newsletter system);
- in the event that we sell any business assets, the personal data of our customers may be disclosed to a potential buyer;
- to our professional and legal advisors;
- to our marketing agencies depending on your marketing preferences;
- to courts, arbitration bodies, parties engaged in fraud prevention, law enforcement authorities, regulators or attorneys if necessary to comply with the law or for the establishment, exercise or defence of rights or legal claims; and
- otherwise where we have your consent or are otherwise legally permitted to do so.

Insofar as we contract other companies to carry out tasks on our behalf within the framework of a data processing agreement and forward your Personal Data for this purpose, said company or companies shall be required to protect your Personal Data and to use the latter only for the specific purpose outlined in the agreements with these processors.

In cases we transfer, depending on your indicated location, data to countries outside the EU/EEA, we transfer personal data to external recipients in such countries only if the recipient has sufficient safeguards required by law such as EU Standard Contractual Clauses or is certified under the Privacy Shield.

You may request further information, such as copies of the respective safeguards, about the safeguards implemented in relation to specific transfers by contacting [klara@eiri.cz](mailto:klara@eiri.cz).

## 4. Your rights concerning your personal data

If certain requirements are fulfilled, you have the following rights:

- Request access to the Personal Data that we process about you
- Request rectification of your Personal Data
- Request erasure of your Personal Data
- Request restriction of Processing of your Personal Data
- Object to the Processing of your Personal Data
- Request to receive your Personal Data in a structured, commonly used and machine-readable format (right to data portability)
- Withdraw any future consent with future effect
- Not to be subject to a decision based solely on automated processing, including profiling

You may contact us to claim your rights as follows:

**Klára Holanová**

V Horní Stromce, 2300/ 7, Praha 3

[klara@eiri.cz](mailto:klara@eiri.cz)

+420 604 121 106

We shall respond to your request in accordance with the applicable legal provisions.

## 5. Cookies

To learn more about our policy on cookies, click

## 6. Data security

We do our utmost to store your Data using all the technical and organisational possibilities at our disposal to prevent third parties gaining access to it.

All Data is stored on servers with the highest security standards to protect against any attempts by third parties to access the Data.

## 7. Data privacy manager

If you have questions with regard to this Privacy Notice or to our processing of your Personal Data, please contact our Data privacy manager: [klara@eiri.cz](mailto:klara@eiri.cz)

## 8. Your right to lodge a complaint

If you think that the processing of Personal Data by us violates data protection laws, you have the right to lodge a complaint with the competent supervisory authority.