

# The general principles on the protection of individuals with regard to the processing of personal data

# I. General clause

- The Administrator of the personal data pursuant to Article 4 point 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: "GDPR") is Decision 21 s.r.o., ID 03680941, with registered office at Zapova 1559/18, 150 00 Prague 5 - Smíchov (hereinafter: "Administrator").
- 2. The contact details of the administrator are
  - a. Address: Zapova 1559/18, 150 00 Praha 5 Smíchov
  - b. Email: info@decision21.com
- 3. Personal data means any information about an identified or identifiable individual; an identifiable individual is a physical person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, a network identifier or to one or more specific elements of the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 4. The Administrator generally deals with this data (for the purpose of newsletters and offers based on enquiries from the enquiry form):
  - a. Name and surname,
  - b. Email address,
  - c. Phone number.
- 5. The Administrator has not appointed a Data Protection Officer.

#### II. Sources and categories of processed personal data

- 1. The Administrator processes personal data that you have provided to the Administrator or personal data that the Administrator has obtained as a result of your enquiry.
- 2. The Administrator processes your identification and contact data and the data necessary for the performance of the agreement.



## III. Legal basis and purpose for processing personal data

1. The legal reason for processing personal data is:

Performance of the contract between you and the Administrator pursuant to Article 6(1)(b) GDPR, the legitimate interest of the Administrator in the provision of direct marketing (in particular for sending commercial communications and newsletters) pursuant to Article 6(1)(f) GDPR.

- 2. The purpose of the processing of personal data is:
  - processing of your inquiry and the exercise of rights and obligations arising from the contractual relationship between you and the Administrator; the inquiry requires personal data that are necessary for the successful processing of the inquiry (name and address, contact), the provision of personal data is a necessary requirement for the conclusion and performance of the contract, without the provision of personal data it is not possible to conclude the contract or its performance by the Administrator,
  - sending commercial communications and other marketing activities.
- 3. Ze strany správce nedochází k automatickému individuálnímu rozhodování ve smyslu čl. 22 GDPR.

#### IV. Data retention period

- 1. The Administrator keeps personal data
  - until the consent to the processing of personal data for marketing purposes is withdrawn, for a maximum of 5 years if the personal data is processed on the basis of consent.
- 2. After the expiry of the retention period, the Administrator shall delete the personal data.

#### V. Your rights

- 1. Under the terms of the GDPR, you have:
  - the right of access to your personal data under Article 15 GDPR,
  - the right to correction of your personal data pursuant to Article 16 of the GDPR, or restriction of processing pursuant to Article 18 of the GDPR.
  - the right to the erasure of personal data pursuant to Article 17 GDPR.



- the right to object to processing under Article 21 GDPR; and
- the right to data portability under Article 20 GDPR.
- the right to withdraw consent to the processing in written form or electronically to the address or email of the Administrator specified in Article III of these terms and conditions.
- 2. You also have the right to file a complaint with the Office for Personal Data Protection if you believe that your right to personal data protection has been violated.

### VI. Personal data security conditions

- 1. The Administrator declares that it has adopted all appropriate technical and organisational measures to ensure the security of personal data.
- 2. The Administrator has taken technical measures to secure data storages and storages of personal data in documentary form, in particular in the form of encrypted communication of the tools used, a policy of security functions of employee accounts and their passwords and multi-factor authentication of the Administrator's employee accounts.
- 3. The Administrator declares that only persons authorised by it have access to personal data.

#### **VII. Final provisions**

- 1. By submitting an inquiry from the online inquiry form, you confirm that you are aware of the privacy policy and that you accept it entirely.
- 2. You agree to these terms and conditions by completing the form and confirming your consent by clicking on the "Submit" button via the online form. By submitting the form, you confirm that you are aware of the privacy policy and that you accept it in its entirety.
- 3. The Administrator is authorised to change these conditions. It will publish the new version of the Privacy Policy on its website or send you a new version of the Privacy Policy to the email address you have provided to the Administrator.

These conditions are effective from 17 May 2021.