

Privacy policy

We have prepared this privacy policy (hereinafter referred to as the "**Policy**") in accordance with applicable laws and international standards in the area of personal data protection.

We only process personal data when necessary and to the extent that it is necessary for our stated purposes. At the same time, we take care to ensure that the data we hold is accurate, is appropriately protected and is not used for any purpose other than its stated purpose. We only carry out the processing for as long as necessary. This Policy is mainly to inform you about the details of the processing we carry out and your rights.

1. Basic terms

GDPR	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, and repealing Directive 95/46/EC.
PERSONAL DATA	Any information about the data subject as defined below.
PERSONAL DATA SUBJECT	An identified or identifiable natural person, where an identifiable natural person is a natural person who can be identified, directly or indirectly, in particular by reference to a particular identifier, such as a name, identification number, location data, network identifier or a single one or more specific elements of that natural person's physical, physiological, genetic, psychological, economic, cultural or social identity (hereinafter also referred to as " You " or " Your " in the respective forms).
PERSONAL DATA ADMINISTRATOR	A natural or legal person, public authority, agency or other subject which alone or jointly with others determines the purposes and means of the processing of personal data.
PROCESSING OF PERSONAL DATA	Any operation or set of operations involving personal data or sets of personal data which is carried out with or without the aid of automated processes, such as collection, recording, organizing, structuring, storage, adaptation or modification, retrieval, insight, use, disclosure by transmission, dissemination or any other disclosure, alignment or combination, restriction, erasure or destruction.
CONTRIBUTOR	A natural or legal person, public authority, agency or other body that processes personal data for the administrator.
RECEIVER	The natural or legal person, public authority, agency or other body to whom the personal data is disclosed, whether or not it is a third party.
SUPERVISORY OFFICE	In the Czech Republic, this authority means the Office for Personal Data Protection, with its registered seat at Pplk. Sochora 27, 170 00 Prague 7 (hereinafter referred to as the " OPDP ").
JOB CANDIDATE	A natural person who is interested in working for a personal data administrator and who participates in a selection procedure.
CONTRACTUAL PARTNERS AND CLIENTS	For the purposes of this Policy, such persons shall be understood to include both business and non-business persons with whom the personal data administrator has any contractual relationship. This may include, but is not limited to, clients, suppliers,

collaborating freelancers or tenants of the personal data administrator.

2. Personal data administrator

- 2.1 The administrator and processor of personal data is company **VisionCraft s.r.o.**, ID no. 074 00 942, with its registered seat at Výstaviště 405/1, Pisárky, 603 00 Brno, file No. C 107988, maintained by the Regional Court in Brno (hereinafter referred to as "**Company**" or also "**we**" and "**our**" in the respective forms), contact e-mail: info@visioncraft.ai

3. Categories of data subjects, personal data processed, purpose, legal basis and duration of processing

- 3.1 The scope of the personal data processed varies depending on the purpose of the processing.
- 3.2 We process personal data for a clearly defined purpose, as follows:

Respondents to questionnaires or interviews

Purpose of processing personal data	Legal basis and personal data processed	Personal data	Processing time
Evaluation of the interview with the respondent.	The legal basis is the consent of the respondent.	For this purpose, we process in particular the identification and contact details of the respondent, the information provided by the respondent in the questionnaire or during the interview, and the recording of the interview.	For this purpose, personal data may be processed for the duration of the consent or until its withdrawal.

Contractual partners and clients

Purpose of processing personal data	Legal basis and personal data processed	Personal data	Processing time
Performance and execution of contracts	The legal basis is the performance of the contract between the subject and the Company.	For this purpose, we process the data of the natural persons with whom we communicate in the context of the conclusion and performance of the contract and of the	For this purpose, personal data may be processed for the duration of the contractual obligations and subsequently for the time necessary to comply with the

		contracting parties, namely identification details, contact details, bank details (in particular bank account number), payment details, etc.	Company's legal and tax obligations.
Enforcement of contractual claims after termination of the contract	The legal basis is the Company's legitimate interest in the enforcement of claims and other obligations under contracts concluded between the Company and the subjects concerned.	For this purpose, we process identification details, contact details, accounting details, communication history. Identification and contact details of natural persons representing legal entities may also be retained within this documentation.	For this purpose, personal data may be processed for a period of 3 years after the termination of the contractual relationship and, if administrative or judicial proceedings are initiated, for the entire duration of these proceedings.
Fulfilling the Company's obligations in the area of accounting, tax and other legal regulations	The legal basis is the fulfilment of legal obligations imposed on the Company by legal regulations such as the accounting act or the value added tax act and other tax laws, the act on certain measures against money laundering and the financing of terrorism, etc.	For this purpose, we process data to the extent required by the relevant laws, in particular identification data, contact data and accounting data.	For this purpose, personal data may be processed for up to 10 years from the end of the tax year in which the transaction took place.

Job candidates

Purpose of processing personal data	Legal basis and personal data processed	Personal data	Processing time
Selecting the right job candidate	The legal basis is the negotiation of the employment contract, or the candidate's consent in the event of a later re-approach with a job offer.	For this purpose, we process, in particular, identification details, contact details and other details provided by the job candidate, in particular in the CV and cover letter, and an extract from the criminal record, if necessary or appropriate.	For this purpose, personal data may be processed for up to 6 months after the end of the selection procedure (for the purpose of re-contacting the selected job candidate in the event of termination of employment during the probationary period) or for the duration of the consent or until its withdrawal.
Proving the legality of the procedure for selecting a job candidate	The legal basis is the Company's legitimate interest in demonstrating non-discriminatory treatment.	For this purpose, we may process, in particular, identification details, contact details and other details provided by the candidate, in particular in the CV and cover letter.	For this purpose, personal data may be processed for a period of 3 years (to prove non-discrimination, if applicable).

All data subjects

Purpose of processing personal data	Legal basis and personal data processed	Personal data	Processing time
Selection of archival material (archiving)	The legal basis is the fulfilment of legal obligations arising in particular from Act No. 499/2004 Coll., on archiving and file service.	Exceptionally, personal data of natural persons may appear in archived documents.	For this purpose, personal data may be processed for the period required by law or by the relevant district archive.

- 3.3 We only retain personal data for the time necessary for the purpose of processing as set out in Article 3.2 above. After this period, personal data may only be kept for the purposes of the national statistical service, for scientific purposes and for archiving purposes.

4. Receivers of personal data

- 4.1 Receivers of personal data may, in justified cases, also be other entities.

- 4.2 In particular, the following categories of recipients may be subject to the disclosure of personal data:
- a) processors who process Your personal data on our instructions and whose relationships with You are governed by contracts or data processing clauses (in particular, cooperating freelancers and providers of software used by us). Our processors include companies: Webflow, Inc.,
 - b) public authorities and other entities if required by applicable law (in particular the financial administration, the Police of the Czech Republic and other law enforcement authorities, etc.),
 - c) other entities in the event of an unexpected event in which the disclosure is necessary to protect life, health, property or other public interest or is necessary to protect our rights, property or safety.

5. Disclosure of personal data abroad

- 5.1 Personal data may be disclosed within EU countries, i.e. countries with a comparable level of personal data protection as the Czech Republic.
- 5.2 Personal data may be disclosed between all companies within the group, regardless of their location, including to entities located outside the European Union (EU), in order to provide services effectively.
- 5.3 In addition, personal data may be disclosed to third countries, i.e. outside the EU, which, according to a decision of the European Commission, ensure an adequate level of protection of personal data within the meaning of Article 45 GDPR.
- 5.4 Your personal data **will not be** disclosed to any third country for which a decision of the European Commission has not been issued pursuant to Article 45 GDPR without first ensuring that we have achieved a sufficient level of protection for Your personal data through contractual clauses or other appropriate safeguards in accordance with the GDPR.

6. Security

- 6.1 In order to ensure the security and confidentiality of Your personal data, which is extremely important to us, we use technical and organizational measures, in particular to protect against unauthorized 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 personal data and store personal data in a private cloud managed by the Company. All measures are regularly evaluated and updated.

7. Your rights

- 7.1 As a data subject, You have the following rights:
- a) the right to request **access to personal data relating to You** from us under the conditions set out in Article 15 GDPR;
 - b) the right to **withdraw your consent** to the processing of personal data processed by us on the basis of Your consent at any time under the conditions set out in Article 7 GDPR;
 - c) the right to request **correction of personal data** under the conditions set out in Article 16 GDPR, **restriction of processing of personal data** under the conditions set out in Article 18 GDPR or **erasure of data** under the conditions set out in Article 17 GDPR;

- d) the right **to raise an objection to the processing of personal data concerning** him/her on the basis of Article 21 GDPR;
- e) the right to **data transfer to another administrator under** the conditions set out in Article 20 GDPR;
- f) the right **not to be subject to any decision based solely on automated processing, including profiling** under the conditions set out in Article 22 GDPR. **No automated individual decision-making takes place** in our processing of personal data, even on the basis of profiling, i.e. without human intervention;
- g) the right to **obtain information about a breach of security of Your personal data** under the conditions set out in Article 34 GDPR;
- h) the right **to submit a complaint with OPDP** and under the conditions set out in Article 77 GDPR if You suspect that the processing of Your personal data violates the obligations set out in the GDPR.

8. Provision of services using sensory devices

- 8.1 In connection with the provision of services using sensory devices, the Company would like to inform You that the sensor does not process personal data. The system is designed in such a way that the data handled by the Company does not allow any personal data subject identify directly, therefore it does not handle elements specific to the physical, physiological, psychological, economic, cultural or social identity of the data subject, nor does it handle sensitive personal data; it does not capture and store biometric data that would allow the identification or authentication of the subject. The sensor device may process certain data as vehicle identification markings (e.g. number plates) which, in conjunction with the relevant database, may identify the data subject. However, this functionality is disabled by default.
- 8.2 Although the GDPR and its obligations do not apply to VisionCraft sensor services, the Company considers it necessary to draw Your attention to the fact that in certain situations You may be in the position of a data administrator when using these services.
- 8.3 These situations include, but are not limited to:
 - a) where the sensors, on Your explicit instruction, capture data by which a natural person can be identified, or
 - b) if the Company processes data directly from the customer's camera system stream.

If you have any questions about the processing of Your personal data, need any other related assistance or wish to exercise Your rights, please contact us electronically at email at info@visioncraft.ai or in writing to the Company at the above address.

This privacy Policy is effective from 12/14/2023.