

# Personal data protection policy

The present principles of personal data protection (hereinafter referred to as the “**Policy**”) are intended to inform You, how we, the company **EDGAR GROUP, s.r.o.**, reg. No.: 27947742, having his legal address at Věžeňská Str. 116/5, Staré Město, ZIP 110 00, Prague 1, registered in the Trade Registry kept by the Municipal Court in Prague under file No. C 128617 (hereinafter referred to as the “**Administrator**”), process, collect, use and protect Your personal data acquired via the e-shop operated on a website located at the Internet address [www.edgargrig.cz](http://www.edgargrig.cz) (hereinafter referred to as the “E-shop”).

Any management of your personal data is carried out in accordance with applicable law, in particular 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**”), act o. 127/2005 Coll., Act On Electronic Communications, as amended, and act No. 480/2004 Coll., Act On Certain Information Society Services, as amended.

## 1. LEGAL REASONS FOR PERSONAL DATA PROCESSING

We obtain and process your personal data always in the extent necessary for performance of the respective purpose, and solely upon legal titles provided by the legislation. You provide us Your personal data voluntarily; therefore You can always revoke your consent to their processing.

The individual legal titles authorizing us to process Your personal data are as set below:

Performance of contract - we use Your personal data for the purposes of conclusion of contractual relationship and its further performance;

Consent - You provide us your personal data only in connection with the exact purpose of processing (e.g., for the purpose of Your participation in the loyalty program);

Performance of legal obligation - we will use Your personal data for performance of obligations stipulated by the law (e.g., for performance of tax obligations);

Legitimate interest - Your personal data will be used for the purpose of our legitimate interests (e.g., for improvement of our services).

## **2. PURPOSES OF PERSONAL DATA PROCESSING**

We process Your personal data for individual purposes based on the legal titles defined in the Article 1 hereof.

Here is the list of actions, where we will process Your personal data:

### Order and purchase of the goods

We process Your personal data provided upon placing of an order exclusively for the purpose of conclusion of purchase contract and its further performance, including settlement of any claims arising from defective performance. The legal basis for the processing of such personal data is performance of the purchase contract based on the order, and at the same time the performance of legal obligations as per legal regulations governing rights and obligations in connection with consumer protection and accounting. The reason for provision of the personal data to the Administrator is the identification of the contractual parties necessary for the conclusion and performance of the purchase contract, which is impossible without the provision of these data.

### Communication and marketing

Other purpose authorizing us to process Your personal data is the interest to answer Your questions or the consent you may give us in connection with commercial communication within the marketing activities.

We process personal information collected through cookies based on Your consent (which you can grant us by confirming in the E-shop after you have been notified on the use of cookies and had the opportunity to familiarize yourself with this Policy). We are entitled to process the personal data acquired via the cookie files even if You use the web interface after you have been notified on the processing of personal data. We use personal data acquired via the cookie files upon the legitimate interest for the customer support purposes, improvement of services including the analysis of users' behavior and marketing.

### Evaluation of customer satisfaction

We may use the e-mail address and information about purchased goods based on a legitimate interest in order to control and improve our services and goods.

### **3. Personal data categories**

Your personal data are divided into several categories:

- Identification data (in particular the name, last name, sex, date of birth, identification and tax ID of the natural person);
- Contact details (in particular residential address, e-mail address, telephone number);
- Transaction details (in particular bank account number); and
- Network identifiers (especially information obtained through cookies, IP address, browser type, device and operating system, time and number of accesses to the web interface, and other similar information).

The personal data shall be processed electronically in an automated manner or in a printed form in a non-automated manner. There is no automated decision-making or profiling during the personal data processing.

### **4. TERM OF PERSONAL DATA PROCESSING**

We process Your personal data during the whole term of contractual relationship.

In case You have subscribed to commercial communications, we will process Your personal data until You will revoke Your consent. You can easily do so by unsubscribing from the commercial communications. We allow You this at the end of each commercial communication - just click on the URL "Unsubscribe from the commercial communication". You can revoke Your consent with the subscription by request sent to the email [info@edgargrig.cz](mailto:info@edgargrig.cz),

or by calling the Administrator +420 773 833 343 (Mon-Fri, from 10 AM to 7 PM).

Personal data necessary for the proper provision of services, or performance of all our obligations, whether these obligations arise from the purchase contract or generally binding legal regulations, must be processed regardless of Your consent, for the period stipulated by or in accordance with the relevant legal regulations (e.g., for tax documents this term is at least 10 years).

Please note that we do not archive any phone call recordings on our phone lines.

## **5. TRANSFER OF PERSONAL DATA TO THE THIRD PARTIES**

To the necessary extent and solely for the purposes of proper execution of Your order Your personal data can be transferred to Your chosen contractual carrier and / or the custodian of the purchased goods. Carrier and/or custodian is authorized to process Your personal data only for the purposes of delivery of the goods and/or handing over the goods, then these personal data must be immediately deleted.

We do not collect data about the payment cards used for payments in our shop or on our E-shop. This data are stored only in the respective banking institution, but we see only anonymized number of Your payment card.

Your personal data may be provided in the necessary extent to persons, who provide us with legal and accounting services, e.g. for the purposes of enforcement of our rights and/or to ensure proper compliance with obligations under generally binding legal regulations (e.g., accounting). If the legal order or a state authority (e.g., the Police of the Czech Republic) obliges us to share Your personal data with them, we cannot deny this request.

We will never transfer Your personal data outside the EU.

Besides the Administrator, the personal data are processed by:

- Your chosen carrier, i.e. Česká pošta, s.p. (reg. No.: 471 14 983), PPL CZ, s.r.o. (reg. No.: 25194798), or any other carrier;
- banking and payment institutions, which process the payment for purchased goods;

- persons providing the Administrator accounting and/or tax services;
- Google LLC (hereinafter referred to as the „**Google**“).

## 6. COOKIES

Cookies are text files stored in the PC or any other electronic device of each visitor of E-shop, which allow its operation. Not all cookies collect personal data. Some just allow correct operation of the E-shop. You may reject the use of cookies in the settings of internet browser. Rejecting the use of cookies may result in inactivity of some functions of the E-shop.

The E-shop uses relational (temporary) cookies, which are automatically deleted upon finishing of browsing of web interface. Then, it also uses constant cookies, which remain in the device of E-shop visitor, unless he deletes them.

Cookies used by the E-shop are the following:

- First-party cookies - these cookies are assigned to the web domain. These are necessary and performance cookies, which can be temporary or permanent;
- Necessary cookies - allow navigation in the E-shop and use of basic functions, they do not identify anyone and no personal data are involved;
- Performance cookies are designated to analyze how you use the E-shop (number of visits, time spent on the web interface, etc.); the data obtained by these cookies is anonymous;
- Third-party cookies - these cookies are assigned to the other domain. These cookies allow analyzing the web and displaying the optimized ads, being functional cookies, targeted and ads cookies.
- Functional cookies - are used to personalize content by remembering login data, location, etc.; these cookies may obtain and process personal data;
- Targeted and advertising cookies - serve to show targeted ads on and off the web interface; they may acquire and process personal data.

Administrator may share information about the use of E-shop with its partners in social networks, advertisement and analytics.

The following methods can influence, which of Your cookies will be processed by the Administrator:

- Use one of the common Internet browsers (e.g., Internet Explorer, Safari, Firefox, Chrome) with the private browsing feature enabled, which prevents the storage of data from visited websites, or You can completely disable the storage of cookies in Your browser. If You disable processing of third-party cookies, You will disable some of the functions that help You to use the E-shop;
- You can easily control processing of third-party cookies; if you will use this [additional program from Google](#) (can be launched only from the PC). Nonetheless, disabling of third-party cookies will materially hinder the improvement of our E-shop.

The E-shop uses Google Analytics service, which works with the information acquired through the cookie files. More information on how Google uses the data acquired from the Administrator, and how You can edit or forbid the processing, are available at the following URL: [How Google uses information from the web or application](#).

## **7. YOUR RIGHTS RESULTING FROM THE PERSONAL DATA PROTECTION**

We understand, that personal data protection provided us in connection with Your purchase, are strictly confidential, that's why You have the right to know, how they are handled.

You have the right to:

- request the Administrator to give access to Your personal data;
- edit the provided personal data;
- delete or restrict the personal data processing;
- object against the personal data processing;
- transfer the personal data to other Administrator;

- file a complaint with the Office for Personal Data Protection, if You believe we are process your personal data outside the law and/or the GDPR.

Further information regarding who and how they process personal data will be provided to you by the Administrator upon Your inquiry.

## **8. CONTACTS FOR INQUIRIES OR COMMENTS**

If You will have any inquiry or comment regarding protection of Your personal data or this Policy, please contact us via our email address [www.edgargrig.cz](mailto:www.edgargrig.cz) or by phone +420 773 833 343 (Mon-Fri, from 10 AM to 7 PM).

## **9. SUPERVISION**

In case You disagree with the method of Your personal data processing, You may refer to the Office for Personal Data Protection, having its legal address at: Pplk. Sochora Str. 27, ZIP 170 00, Prague 7, tel.: +420 234 665 111, web: [www.uoou.cz](http://www.uoou.cz).

If Your place of residence, place of employment or alleged breach of personal data protection is located outside the Czech Republic in another member state of the European Union, You may contact the competent supervisory authority in that member state.

**For the purpose of assuring of an immediate remedy, the Administrator kindly requests You to contact him via his email address [www.edgargrig.cz](mailto:www.edgargrig.cz) or by phone +420 773 833 343 (Mon-Fri, from 10 AM to 7 PM).**

This Policy enters into force and is valid from 01.10.2019, and is available in electronic form at [www.edgargrig.cz](http://www.edgargrig.cz).