

# Personal Data Protection Policy

We declare that we process all personal data provided to us in accordance with the Act No.: 101/2000 Sb. On the Protection of Personal Data and on Amendments to Certain Acts, as amended, and, after 25 May 2018, also in accordance with the REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (EU) No. 2016/679 from 27 April 2016 on protection of natural persons in connection with personal data processing and on free movement of such data and repealing the directive 95/46/EC (general regulation on personal data protection), otherwise known as GDPR.

## Data Controller

We are company **Trackito Technology Czech Republic, s.r.o.**, with registered address at Hudcova 533/78c, Medlánky, 612 00 Brno, Company ID 04179951, registered in the Commercial Register kept by Regional Court in Brno, Section C, Insert 88594, and as a Data Controller, we process your personal data.

## Which Personal Data do we process?

### Personal Data provided by you

We process the personal data provided by yourselves. This includes data provided during registration of your user account, during communication with us and during order realization (e-mail, name, surname, address). We use this data for your logging into the application, for successful completion of an order (order confirmation, contract conclusion, sending of the related documents and order delivery) and for the performance of services ordered (sending of information related to the operation of the device, to which the respective services are provided). Further, for the purpose of contract performance, we process data on geofence if you have entered it in the application.

If you provide personal data to us and you are below the age of 16, you are obligated to secure consent of your legal representative and to express the secured consent by marking the acceptance of terms and condition while placing an order; respectively, the parental consent can be expressed in another demonstrable manner.

If you contact us via telephone or write us a message, we will also process your personal data contained in this communication.

In accordance with this Personal Data Protection Policy, you undertake to state your personal data, respectively the identification data in case of a Service recipient, who is not a subject of the data, correctly and truthfully, and to inform us of any change of your personal data without delay.

### Personal data of third parties provided by you

If you provide us with personal data of third parties, you are obligated to inform the respective persons of this fact and to secure their consent with this Personal Data Protection Policy.

If you allow use of the Service by a user, resp. the authorized user, you also undertake to inform the user, resp. the authorized user on the processing of their personal data in the form of their e-mail address, which is necessary for the use of the Service, including the terms of processing of this personal data in accordance with this Policy.

## **Automatically processed personal data**

If you visit our website, we are authorized to collect certain information about you, such as the IP address, date and time of your access of our website, information on your internet browser, operating system or your language settings. We can also process information on your behaviour on our website, i.e. which links do you visit on our website and the viewed goods. However, the information on your behaviour on our website is anonymised for the purpose of your complete privacy, and that is why not even we are able to connect them to specific users, i.e. to a specific person.

## **Cookies**

We also process cookies automatically in order to improve the quality of operation of our website.

## **Why do we collect and process your personal data**

We process your personal data for the following purposes:

- Order realization
- Customer care: in order to include you in our customer database or if you approach us with a query or a problem, we have to process your data in order to be able to answer or resolve it. In some cases, personal data might be provided to third parties as well (delivery services).
- Marketing activity: especially e-mail marketing and marketing competitions. Sending of business information on the basis of your consent. You can easily unsubscribe from the business information mailing list.
- Use of rights and legal claims and inspections by the bodies of public authority: we can also process your personal data, because we need them to effect our rights and legal claims. Furthermore, we can also process your personal data, because we need them for the purpose of inspections performed by the bodies of public authority and for other similarly serious reasons.

## **We process personal data on the following legal bases**

### **Contract execution and conclusion**

We need most of your personal data in order to be able to conclude a purchase contract with you. If you decline to provide us with the necessary personal data, we cannot conclude a contract with you in accordance with the terms and conditions. After the contract is concluded, we process your personal data in order to properly provide you with the purchased services. Therefore, on the basis of this legal reason, we especially process registration, invoicing and delivery data.

### **Legitimate interests**

We also use your personal data to provide you with relevant content and information. In this manner, on the basis of legitimate interest, we automatically process especially personal data and cookies. For the same legal reason, we are allowed to send e-mail messages and push notifications to you as our customers.

## Consent

We process your personal data on the basis of your consent for the purpose of sending of business information (e-mail marketing). At any time, you can withdraw your consent via the link contained in the business information or by informing us of this fact via the contact e-mail address, stated at our website.

## Who processes your personal data?

The personal data is processed by the Data Controller and by persons authorized by him, if this processing is necessary to achieve the purpose of processing of the respective personal data. We also process personal data through Data Processers on the basis of a contract on personal data processing. The personal data can be made available to third parties, only if these third parties are authorized to see them in accordance with legal regulations. The personal data is not provided to any other subjects. The personal data is stored on our servers.

Our Data Processers include:

- Google, Inc.: we use it as an intermediary of our e-mail communication (<https://policies.google.com/privacy/update?hl=cs>)
- EVici webdesign s.r.o.: the licensed operator of our e-shop with our products (<http://guide.upgates.com/a/ochrana-osobnich-udaju>)
- GOPAY s.r.o.: we use this payment gateway as an intermediary of your payments on the e-shop (<https://gopay.com/cs/index.html>)

## For how long do we process your personal data?

We store your personal data for the period of effectiveness of the Contract and further for a period of 10 years at most, or for a longer period, if it is justified by legal regulations in the given case. In case of personal data processing, to which you have consented (for example sending of business information), your personal data shall be processed for the period of 10 years or until withdrawal of such consent.

## Profiling

We use profiling as an information tool to determine customer behaviour on our website within Google Analytics, and we use it to improve our services.

## Personal data security

Your personal data is safe with us. In order to prevent unauthorized access and abuse of your personal data, we have implemented appropriate measures of both technical and organizational nature.

We care very much about the protection of your personal data. That is why we not only regularly inspect its security, but we also improve its protection continuously. The entire communication between your device and our website servers is encrypted. Your login information is password-protected and the entirety of your data is stored exclusively on servers located in secured data centres with limited and carefully controlled access.

We try to use security measures which provide sufficient security with regard to the current technologies. The implemented security measures are updated regularly.

## **Your rights with regard to protection of your personal data**

With regard to your personal data, at any time, you have the right to withdraw your consent with personal data processing, the right to correct or complete your personal data, the right to demand limitation of their processing, the right to raise a complaint against processing of your personal data, the right to access your personal data, the right to demand transfer of your personal data, the right to be informed on breach of security of your personal data, and, under certain conditions, the right to have some personal data processed in relation to you deleted (however, the deletion will not affect the data on the documents we have to store in accordance with the valid laws, such as invoices or credit notes)

We wish to warn you that the key information of your credit card is not stored with our company, but with our payment gateway. That is why this data cannot be deleted by us and you have to contact the payment gateway, through which you have effected the payment.

You have the right to raise a complaint against personal data processing for the purpose of our legitimate interests, including the direct marketing. If there are no serious legitimate reasons for processing, which predominate over your interests or rights and freedoms, or for the purpose of determination, performance or defence of your legal rights, we will terminate personal data processing for these purposes on the basis of your complaint.

At the same time, you have right to access the following information regarding your personal data:

- What are the purposes of processing of your personal data
- What are the categories of the respective personal data
- Who receives your personal data (except us)
- What is the planned period of storage of your personal data
- Whether you have the right to demand a correction or deletion of your personal data or limitation of their processing or the right to raise a complaint against such processing or not
- Information on the source of the personal data, if they were not provided by you

If you wish to request access to your personal data or to complete, modify, correct, transfer or delete your personal data, contact us at the e-mail address [info@trackitotech.com](mailto:info@trackitotech.com), or, you can file the request yourselves in your administration, if it allows such action.

If you believe that we process your personal data unlawfully, you also have the right to file a complaint with the Office for personal data protection. However, we would appreciate it if you tried to resolve these situations directly with us at first.

By concluding the Contract, you confirm that you have acquainted yourselves with the information and instructions in accordance with this article of the TC.