#### **Personal Data Protection**

Privacy is our priority. We collect and process personal data in accordance with applicable legislation, in particular the General Regulation (EU) No. 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data (hereinafter "GDPR") and Act No. 110/2019 Coll., on the Processing of personal data, as amended. All personal data obtained are processed on the basis of legal titles, for legitimate and clearly defined purposes, and only to the extent necessary and for the time necessary to achieve the specified purpose. More detailed information, including contact details, can be found below.

# Identity and contact details of the administrator:

ELTON hodinářská, a.s.

Headquarters: Náchodská 2105, 549 01 Nové Město nad Metují

Company Reg. No.: 25931474

Tel.: +420 491 401 967

E-mail: info@prim.cz

# What personal data do we collect and process?

- Personal data that you provide us yourself:
  - in order to execute the order:
    - identification data: name, surname, e-mail address, telephone number, ID number, VAT number;
    - contact details: billing/delivery address or other contact address, telephone number, email address;
  - for direct marketing (newsletter): name, surname, email address, postcode;
  - by sending an inquiry or contact form: name, surname, email address, phone number.
- Personal data that we process automatically:
  - When you visit our website, data about you may be collected, such as:
    IP address, unique identifier of the website reader (elton.cz, eltonhodinarska.cz, prim.cz).
  - Cookies: we use two types of cookies. Our own used directly to run the online shop. We store favourite products, products added to the cart or comparative products. We also use third-party cookies, which store information about visiting the online

shop anonymously. These can then be used for analytical or marketing purposes. All the information in cookies that we store is anonymous.

- Camera systems at our facilities:
  - Recordings from the cameras located on-site are also automatically processed in our facilities. The establishments are equipped with a camera system with online transmission and recording. The purpose of operating the camera system is to protect property and ensure the safety and health of those persons in the establishment. The operator of the camera system is us, i.e. ELTON hodinářská, a.s.

# On the basis of what authorisation and for what purposes do we process personal data?

- The legal reason for processing personal data is:
  - Fulfillment of the contract between you and the controller of the personal data, i.e. ELTON hodinářská, a.s.
  - ➤ Legitimate interests of the administrator for the needs of direct marketing, i.e. in particular sending business messages and newsletters, as well as the protection of property, and in the case of the camera systems on the premises, ensuring the safety and health of those persons in the establishment.
  - > Your consent to the processing of personal data for marketing purposes in the event that no goods or services have been ordered.
- The purpose of personal data processing is:
  - Proper processing of your order and the exercising of rights and obligations arising from the contractual relationship between you and the administrator
  - Proper handling of your electronic enquiry via the contact form
  - Sending business messages or carrying out other marketing activities

If you do not wish to receive business communications or otherwise be affected by our marketing activities, you have the option to withdraw your consent to the processing of personal data for marketing purposes at any time. You can find this option in the footer of each email or in the privacy section of your account. You can also contact the Data Protection Officer at the email address given above.

## How long will we process your personal data?

We will process personal data only for the time strictly necessary to fulfill the above purposes. First of all, therefore, for the duration of the contractual relationship, i.e. for the duration of

the warranty (24 months, or for the period agreed under an individual warranty). Furthermore, we process personal data only to the extent necessary to fulfill legal obligations.

# To whom do we pass personal data?

Your personal data is not passed on to any third party. In the event that it is necessary to transfer your personal data, you will be informed in advance.

## How is your personal data secured?

We always handle your personal data responsibly and in accordance with the applicable legal regulations. We have accepted and maintain such technical and organisational measures that ensure the prevention of unauthorised or accidental access to personal data, their change, destruction or loss, unauthorised transfers, their unauthorised processing, as well as other misuse of personal data.

# What are your rights regarding personal data protection?

You have the following rights in relation to personal data protection:

- The right of access to your personal data
  - The right to know what data we process about you, for what purposes, for how long, to whom we transfer this data and what other rights you have relating to the processing of your personal data. You should find all this information in this document. If you are unsure, you can ask us for information on whether or not the personal data concerning you is being processed by us and, if necessary, request access to this personal data.
- The right to correct personal data
  - ➤ If you find that the personal data we process about you is inaccurate or incomplete, you have the right to correct or supplement the data without undue delay.
- The right to remove personal data
  - In some cases, you have the right to have your personal data deleted. These are situations where:
    - we no longer need your personal data for the purposes for which we processed it;

- you withdraw your consent to the processing of personal data, for the processing of which your consent is necessary and, at the same time, there is no other legal reason to continue to process this data;
- you exercise your right to object to the processing of personal data (see below - Right to object to processing) and under this right it becomes apparent that in the given situation your interest outweighs our legitimate interests with regards to the processing of personal data;
- o you believe that personal data is being processed illegally by us.

Please note that this right does not apply if the processing of the personal data in question is necessary for the fulfillment of our legal obligation or the determination, exercise or defence of our legal claims.

#### The right to restrict processing

In some cases, you have the option to request processing be restricted because you question the accuracy of your personal data; you believe that your personal data is being processed illegally; your personal data is no longer needed for the specified purposes of processing, but you need it to determine, enforce or defend your legal claims; or if you have objected to the processing thereof (see below - Right to object to processing). If the processing of your personal data is restricted, these will only be able to be processed with your consent (with exception to their storage or backup).

#### The right to data portability

You have the right to ask us to transfer the personal data you provided to us. This right only applies to personal data that we process automatically. We will provide you with your personal data in a structured, commonly used and machine-readable format.

# • The right to object to processing

- We process some personal data on the basis of our legitimate interests (see above "On what basis and for what purposes do we process personal data?"). You have the right to object to such processing of personal data. If it is a marketing activity, we will stop processing your personal data without further ado. In other cases, we will do so unless we have compelling reasons to proceed with such processing.
- The right to revoke the consent granted to the processing of personal data

You can apply to exercise your rights at any time to the administrator via the contact details stated in the header of this document / to the data protection officer via the contact details stated in the header of this document.

These conditions are effective as of 20 May 2018.