

GDPR Privacy Policy Notice for Customers

The purpose of the GDPR Privacy Policy Notice for Customers issued by WELLEN a. s., CIN: 26751666, VATIN:CZ26751666, Čerpadlová 991/4a, 190 00 Praha 9, gdpr@wellen.cz ("**Administrator**") is to explain what personal data is processed and handled when company services are used, including company web browsing goods purchase or approaching new customers. Using. The document also defines the purpose of the data processing and the length of the data storage according to EU law. It gives an overview of who and what for can access the personal data and it defines the rights of the data subject.

This Privacy Policy Notice applies to Administrators and partially to his/her representatives or contact person(s), service users, customers buying service(s), or goods, and Administrator website browsers depending on the relevance/position to the Administrator(s).

This Privacy Policy Notice issued in compliance with Act 2016/679 is effective as of May 25th 2018.

Personal Data Categories:

Personal data refers to ANY information related to the individual that can be identified by the Administrator. Administrator providing goods and services is allowed to process personal data divided into the following categories:

1. Basic Personal/Company Identifiers

This data is essential for contract signing and fulfilment. It covers these pieces of information:

Academic Title

First Name and Surname

Company name

Birth Registration Number (or Day of Birth, if the Birth Registration Number is not given)

CIN (Company Identification Number), VATIN (VAT Identification Number)

Place of Residence

Office address

Invoice address

All provided numbers from identification documents and their copies (all figures on the copies irrelevant for the service provision are blackened)

Personal data related to customer representatives or defined contact person

Personal data related to the accounts payer

Bank account details

Signature

One-off sale contracts are only limited to the basic identification data control:

2. Contact details

Phone number

Email address

Social media identifiers

3. Information related to the purchased items, subscribed services, usage of services, payment discipline.

Nature of provided goods or service and their closer specification

Volume of provided service and pricing

Customer segment

Payment discipline details

4. Operation and Localization Data

This data is essential in case of disputes over the provided service or goods, including Administrator's legal obligation(s) fulfilment. It mainly includes:

Incoming call phone numbers

Dialed phone numbers

IP address or URL

Number, name and location of the network termination point

Internet access type

5. Administrator and Customer Communication Details

These details are revealed during Administrator-Customer (A/C) interaction when providing goods and services. It includes the evidence of A/C personal interaction(s) in the stores, during direct communication, during written, or on-line communication, A/C phone call recording and chat, or video chat communication(s).

6. Video Surveillance of Administrator's Spaces

Administrator venues are monitored for security reasons. Monitored spaces are always signed properly.

7. Data Processing Based on Customer's Agreement

Data processing is NOT essential for contract, or legal obligations fulfilment, order placement, or protection of Administrator's interests, but their processing helps to improve services, focus on Customer interests and approach them with customer-tailored offers.

Personal data is processed only if agreed by the customer and may be processed until the agreement contract termination day. Personal data includes:

- marketing research data (only processed if customer agreed on processing data for marketing and business purposes)
- data related to service usage or claiming goods, rewards and bonuses, customer behavior typology monitoring (only processed if customer agreed on processing data for marketing and business purposes)
- contact information if they do not belong to the direct customer
- Administrator's website users behaviour data monitoring based on enabled cookies in the web browser (They are processed in order to improve Administrator's website experience and they are processed together with other personal data (if agreed by the Customer) for the purpose of the Agreement)

Purposes, legal reasons and the length of personal data processing

The extent of processed data is related to their purpose. In some cases it is possible to process data directly based on the contract, legal claim of the Administrator or based on the law (without permission), in other cases only if permitted.

1. Data processing due to contract performance, or meeting of statutory obligations and due to legitimate interests of the Administrator

It is obligatory to provide personal data essential to contract performance to meet statutory obligations and to secure legitimate Administrator(s) interests. Not providing this data would prevent Administrator from providing any service. Data processing consent is not needed for these purposes. Data processing due to contract performance and for meeting legitimate obligations cannot be refused.

Example situations:

- billing services (contract performance)
- meeting of statutory tax obligations (statutory obligation)
- law defined purposes in the framework of the Police of the Czech Republic and judicial cooperation in criminal matters (statutory obligation)
- video-surveillance systems in Administrator(s) spaces preventing damages (Administrator's legitimate interest)

- client's behaviour evaluation during use of service, or when checking payment information needed for managing receivables that may impact future cooperation. Decision for, or against further contract re-entry is not an automated process.
- debt recovery and other client disputes (contract performance)
- recording and monitoring of customer line calls (contract performance)
- processes connected with customer identification (contract performance)
- collecting evidence when defending Administrator rights (legitimate Administrator interest)
- registration of debtors (legitimate Administrator interest)

Personal data needed in these situations is processed to the extent needed for solving these situations as long as it is necessary, or for the period defined by the law. Personal data is then deleted or anonymized. Basic time periods for personal data processing is provided below:

Clients using Administrator services and meeting all financial obligations may have their data processed for 4 years from the last contract termination day. These data include: basic personal identification and contact information, history of used services and details from mutual communication.

In case of purchase(s) from Administrator, Administrator is authorized to process basic personal identification and contact details, details regarding purchased items and details from mutual communication 4 years after purchase warranty period termination.

In case of contract negotiation between Administrator and potential client, which has not ended up entering into contract, Administrator is authorized to process the personal data for the period of 3 months since the last negotiation.

Invoices issued by Administrator are archived for the period of 10 years after their issuance day (according to the Legislation of value added tax § 35, č. 235/2004 Sb.) As it might be necessary to declare legitimate right to issue invoices, client's contracts, orders and offers are also archived for 10 years.

In case of debtors, Administrator keeps personal data related to the debtor for 4 years after his/her removal from the SOLUS debt registry.

Video surveillance footage from Administrator spaces and building surroundings are maintained for 90 days from the day the footage was taken.

2. Data processing by Administrator clients with consent on data usage for marketing and business purposes since May 25th 2018

Service client's personal data is processed for marketing and business purposes with his/her consent. Since May 25th 2018, Administrators have started claiming a new consent. The effective date for the consent on data processing for marketing and business purposes is defined in the Consent of Personal Data Processing. This consent effective May 25th 2018 gives Administrator right to process client's personal data, primarily for tailoring suitable product and service offers (both Administrator's or third party offers). Administrator is authorized to address the client in writing, by phone, via all means of internet advertising and electronic communication platforms resourced from personal data. Only after gaining consent, the Administrator will store customer information including customer behaviour typology as a basis for further anonymized analysing.

All these activities are essential for addressing customers with tailored business offers.

Marketing and Business purposes consent is voluntary and effective May 25th 2018, client can recall it at anytime. This consent is valid as long as the goods or services are used, followed by additional 4 years or until recalled by the client. If the consent is provided, all data categories listed above may be processed for the marketing and business purposes (excl. signature and ID copies) for the period Administrator is authorized to store data to provide services, to meet statutory obligations and to secure own legitimate interests.

2. Processing of data entities provided by client who gave consent on being addressed for marketing purposes

Client who agreed on being addressed for marketing purposes via email address gives Administrator consent to address his/her data entities (contact list) as well as consent until termination date. Administrator can do so for marketing approach and to offer service or goods. If the consent is given via Administrator website, not only contact list data, but also cookies tracked data from Administrator website can be processed – but only if the client accepted the cookies and the cookies are enabled in client's web browser.

3. Cookies data tracking on Administrator's website

If the client enabled cookies in his browser, all his/her action on the Administrator's website is tracked to improve the website function. At the same time, Administrator allows some subjects to place their cookies on the Administrators website.

Sharing personal data with other administrators

Unless otherwise required by law, personal data can be handed over to other administrators only with client's consent – consent is voluntary.

Personal data recipient categories

Administrator uses professional services of other subjects to meet the contract demands and obligations. If these suppliers process personal data received from Administrator they become personal data processors and may process data only to the extent defined by the Administrator. It applies to e.g. debt enforcement, lawyer, auditor or IT services, online advertising or business representation. We carefully choose these suppliers and each of them signs Personal Data Processing Agreement which defines strict obligations regarding data processing.

Data processors are only Czech companies residing in the Czech Republic, EU countries or other safe countries. Out of EU, data is processed according to local legislation.

Administrator meeting his/her statutory obligations hands over personal data to some statutory organs and offices according to current legislative.

Data processing techniques

Administrator processes personal data manually or electronically. Regarding the number of employees, character and extent of personal data processing, the Administrator is not obliged to track the process of data processing.

Business message

Administrator uses company name or another suitable designation for its own, or third party business messages. Each message is always clearly marked as a business message in compliance with current legislation – Administrator is always stated as its sender. Administrator may use a client(s) contact list to deliver business messages if it is his/her legitimate interest until client expresses disapproval. Administrator may also address client(s) contact list based on approval given in data processing for marketing and business purposes agreement. Business messages also contain instructions on how to reject business messages.