

## PERSONAL DATA PROTECTION POLICY

### KEY TERMS

✓ **Landia – Housličky s.r.o:**

When we use the term “us” in this document, we refer to Landia - Housličky s.r.o., Company ID: 066 82 600, with its registered office in Prague 6, Evropská 810/136, registered in the Commercial Register maintained by the Municipal Court in Prague, Section C, File 286951.

✓ **Personal data:**

We consider personal information to be any information which identifies you or from which you can be identified, as well as information which gives details about you (about your person, activities, assets, etc.).

✓ **Processing of personal data:**

Processing covers a wide range of operations performed on personal data, including by manual or automated means. It includes the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data. This applies to the processing of personal data wholly or partly by automated means as well as to non-automated processing, if it is part of a structured filing system.

✓ **Clients and interested parties:**

When we use the term "you", we refer to you as our clients and those interested in our services, especially if you have entered into a contract with us (reservation, future purchase contract, purchase agreement, etc.) or if you have contacted us with interest in our services or offers.

### PERSONAL DATA PROTECTION PILLARS

We regard your personal information as an important value and treat it sensitively in this spirit. When processing personal information, we respect the following basic rules:

✓ **Everything according to the law**

We process your personal data in a fair, lawful and transparent manner. We process personal data in accordance with the applicable laws, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council, the General Data Protection Regulation and Act no. 253/2008 Coll., on Selected Measures against Legitimization of Proceeds of Crime and Financing of Terrorism

✓ **With confidence**

We ensure the protection of your personal information that we process. We process your personal data in a manner which ensures that it is properly protected, including protection by technical and organisational measures against unauthorized or unlawful processing and accidental loss, destruction or damage. We use advanced physical and electronic security measures.

✓ **With clear reason**

We collect your personal information solely for specific, explicit and legitimate purposes, and we do not process such personal information further in a manner incompatible with those purposes. We ensure accuracy and timeliness.

✓ **Adequately**

We process and store only personal data which is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. Your personal data is stored in a form which allows your identification for no longer than is necessary for the purposes for which personal data is processed in the Czech Republic or in the European Union.

In principle, we only process your personal information for two purposes. Namely, the management of contracts and contractual relationships, and for marketing and commercial purposes. Both of these purposes, and the rules we apply to them, are discussed below. Certain data that may, under certain circumstances, be identified with a particular individual, is the product of the use of cookies and web beacons; therefore, we also specify the rules applicable to these technologies.

## **PERSONAL DATA FOR CONTRACT MANAGEMENT AND CONTRACTUAL RELATIONS**

### **Which personal information?**

We process personal information which is contained in the contracts you have entered into with us, and the personal information which results from the course of these contracts. In particular, this includes, but is not limited to, contact and identification information, the subject matter of the contract and the details of the contractual relationship (invoicing, etc.), including commercial communication with you.

### **Why?**

It is natural that we have to process contractual personal data. This enables us to fulfil the obligations of the contracts, exercise the rights under these contracts and fulfil the related legal obligations.

### **Data from you**

We primarily collect personal data for contract management and contractual relationships from you. However, certain personal information may also be the result of the performance of the contracts and communication with you in this regard.

### **Contracts not completed**

We may process your personal data even before the contract is completed, this allows us to ensure that the contract is properly sealed. If the contract isn't sealed due to failure to reach an agreement or for any other reason, we will continue to process your personal data to the extent necessary to resolve any pre-contractual issues and responsibilities arising from them, including the fulfilment of related legal obligations.

### **For how long?**

We process (store) personal data for the period of time during which they may be legally relevant to the implementation of the contract in question, i.e. until expiry of the applicable limitation, preclusion, warranty, storage and other similar periods set out by legal regulations or contract arrangement, whereas the expiration of the last of the said periods takes precedence; in particular cases, the periods depend on assessment of the contract in question; it is usually not longer than 10 years from the completion of the contractual relationship. In the case of forthcoming but unrealised contractual relationships, personal data are processed until the expiration of the limitation periods applicable to the pre-contractual liability.

## **MARKETING AND COMMERCIAL PERSONAL DATA**

We process personal data for marketing and commercial purposes for two reasons:

✓ **Commercial Communication**

To inform our clients and other interested parties about our offers and news by sending e-newsletters. Other commercial announcements to our clients and potentially interested parties, in individually assessed cases, are communicated by telephone, email or other similar means to assess their interest in our offer;

and

✓ **Focus**

In order to adapt and personalise our dealings with you in the case of establishing and performing a contractual or business relationship or communicating with you (customer history, etc.).

It concerns the following types of personal data (not all of the listed types of personal data may need to be processed):

✓ **Basic contacts**

Identification and personal contact data (name and surname, physical address, email address, telephone number, etc.);

✓ **Profile**

Your personal profile data in relation to our cooperation (history and course of business relations, purchases and requests, participation in Landia – Housličky events, etc.); and

✓ **Personalisation**

Personal data which allows us to personalise communication with you (communication history, recommendations, etc.).

For marketing or commercial purposes, we will never process personal data revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic

personal data, biometric personal data, data concerning your health, and data concerning your sex life or sexual orientation.

The source of our personal data for marketing and commercial purposes is:

- ✓ **Our contracts**  
Our contractual relationship with you and the course of our cooperation;
- ✓ **Contact forms**  
Information that you have sent to us (via online forms, real estate portals, etc.); and
- ✓ **Recommendations**  
Through the recommendations of the entities we work with (it is often the case that, when you are interested in buying a property and contacting a real estate agency, that will give us your contact details).

### **Profiling**

For some or all of the personal data we have at our disposal, we create client or potential client profiles which we use for the purposes described. Within the profiles, the data we have about you is sorted to facilitate communication and collaboration. It is by no means a process of data harvesting, automatic evaluation, etc.

### **Electronic commercial communications**

We respect the rule that we can use your e-mail address to send commercial communications only if you have communicated it to us as our client or if you have given us your permission to use your e-mail address. You may withdraw your consent at any time; for the form to allow you to do this, see 'Your Rights'. You will also find a simple and clear option in every email to opt out of commercial communications.

### **Your right to object**

The legal basis for processing your personal data are our legitimate interests in use of data for marketing and commercial purposes in the interest of maintaining and developing our clientele and sales activities in general. You may object to processing of your personal data for marketing and commercial purposes. If you raise an objection to the use of your personal data for the purpose of commercial communications or other forms of direct marketing, we will automatically stop further processing for these purposes. If you raise objections to the use of your personal data for the purpose of personalisation, we will assess this on the basis of the reasons of the objections (in view of your specific situation) whether there exist compelling legitimate grounds on our part for continuing with the processing that override your interests, rights and freedom, and we will inform you of whether we will comply with the objections or not, and for what reasons. See the 'Your Rights' section for the form in which objections can be raised.

### **Only if you are interested in our offer**

Personal data for the purpose of contacting you with an offer or other similar commercial communications are processed only if a reasonable assumption exists that you are interested in our offer; this can be assumed in particular if you are or were our customer. Personal data for the purpose of

personalisation are processed only if you have had commercial contact with us (by purchasing goods or services or if you expressed specific interest in purchasing our goods or services).

### **For how long?**

We process (store) personal data for the purpose of contacting you with our offer or other commercial communications for as long as your interest in our offer can be reasonably assumed, unless you earlier objected to such processing. We process personal data, for the purpose of personalisation, for 10 years from the date of the last commercial contact with you.

### **Cookies and their use**

We use cookies on the [www.zatisilysolaje.cz](http://www.zatisilysolaje.cz) website, i.e. saving certain text files containing website access data through a web browser on your computer, where the data is sent back to our web server when you revisit the website. Cookies are used to personalise the website settings and improve the user experience, including saving user preferences. We can also use cookies to customize ads and monitor website traffic.

### **Web beacons and their use**

We can also use web beacons, both on our website and in email messages. Web beacons are small graphic elements (data files, pixel tags) which are downloaded from our web server for the purpose of monitoring e-mail access, website traffic and user behaviour, and subsequently for optimising e-services for users (including ad personalisation).

### **Our interests and your protection**

The factors described above (personalisation of configuration and monitoring website traffic, ad customisation and monitoring interest in our messages) are our legitimate interests in terms of improving the quality of the services we provide. However, if you do not want us to use cookies and web beacons against you, you can prevent this. The first time you access a website through a specific web browser, you will be asked to accept cookies; this technology will only be used if you grant consent. You may revoke your use of cookies at any time, which is most practical by deleting cookies in your web browser. You also have the option to deactivate the storage of cookies on your computer or sending web beacon download requests, by adjusting the appropriate settings in your web browser.

## **SHARING AND TRANSFERRING PERSONAL DATA**

### **LANDIA Group**

We share personal data within the LANDIA Group, which includes Landia - Housličky s.r.o. This Privacy Policy applies to personal data processed by any LANDIA Group company. All companies which are part of the LANDIA Group have the same obligations, comply with the provisions of this Privacy Policy and are jointly and individually liable to you.

### **Partners**

We may transmit personal data to entities which process personal data for us, or who provide services to us inherently requiring access to personal data. These are primarily entities which provide IT services (such as server or web hosting), database services, accounting services, tax consultancy or legal services.

Cooperation with these entities is always of a strictly operational nature. The recipients do not process personal data independently, but only according to our instructions. We are responsible for ensuring that misuse of any personal data accessed by the recipients does not occur, and that the obligations of integrity and confidentiality of personal data and other obligations necessary to be established under the applicable legal regulations have been agreed with them in advance.

### **Approved transmissions**

We are also entitled to transmit personal data to third parties if you have agreed to do so with the terms of your consent. You can withdraw your consent at any time; see the 'Your Rights' section for the form in which the withdrawal may be applied.

### **Legal obligations and systematic transmissions**

Your personal data may also be transmitted to third parties if it is necessary to comply with our legal obligations (in particular with regard to public bodies) or if the transmission is systematic, in particular to fulfil a contractual relationship of which you are a party to.

## **YOUR RIGHTS**

- ✓ **To information**

You have the right to obtain confirmation from us whether we are processing your personal data or not. In the affirmative, you have the right to access the processed personal data and information about the processing and personal data sources. If you have provided us with personal information by virtue of your consent or in connection with the fulfilment of your contractual obligations, and if this concerns automatically processed personal data, you have the right to receive it in a structured, commonly used and machine-readable format.
- ✓ **To correct, delete and restrict the processing of personal data**

You have the right to correct any inaccurate personal data without undue delay; this also applies to the addition of incomplete personal data. You are also entitled to request that we delete your personal information if we do not have sufficient legal grounds to process it (e.g. if you object to the processing of personal data for direct marketing purposes). If you prefer, instead of deleting your personal data, we will restrict the processing of personal data, i.e. Personal data will only be stored and not processed without your consent.
- ✓ **Right to object**

You have the right, at any time, to object to processing of your personal data for the purposes of direct marketing, resulting in that the personal data will not be further processed for such a purpose. If you object to the processing of your personal data in cases where we process personal data on the basis of our legitimate interests, we first assess (with respect to your particular situation) whether there exists compelling legitimate grounds on our part for continuing with the processing which override your interests, rights and freedom, and we will inform you of whether we will comply with the objections or that we cannot comply with them and the reasoning behind it.

**How to exercise your rights**

You may exercise your rights in any manner which conveys the content of your request, notice or objections in a clear manner in electronic form to [obchod@landia.cz](mailto:obchod@landia.cz). If you request us to take action, we will provide you with information about the action taken without undue delay and, at the latest, within one month of receiving the request; this period may, if necessary, be extended by up to two months, which you must be informed of in advance.

**Your protection**

If you feel that your rights are affected in relation to how we process your personal information, you can file a complaint with the Office for Personal Data Protection ([www.uoou.cz](http://www.uoou.cz)). You also have the right to bring a civil court action and seek legal protection.