

## **INFORMATION ON PROCESSING OF PERSONAL DATA**

The protection of personal data of our clients is our priority. The purpose of this document is primarily to provide you the information on the manner and extent of processing of this data, as well as the rights you have in connection with their processing.

When processing personal data, we are guided by applicable legal regulations, especially the law No. 110/2019 Coll., on the processing of personal data (hereinafter referred to as the "Act") and the General Regulation of the European Parliament and of the Council (EU) 2016/679 of April 27, 2016 on the protection of natural persons in connection with the processing of personal data and on the free movement of this data and on the repeal of Directive 95/46/EC (hereinafter referred to as the "General Regulation" or "GDPR").

The General Regulation represents an updated legal framework for the protection of personal data valid throughout the EU and establishes rules for the processing of personal data, including the rights of the data subject (data subjects are only natural persons).

We collect and process your personal data if:

- you have given your consent to their processing in the sense of Article 6 paragraph 1 letter a) of the general regulation,
- it is necessary for the fulfillment of the contract between you and the controller or for the implementation of measures by the controller before the conclusion of such a contract in the sense of Article 6 paragraph 1 letter b) of the general regulation,
- it is necessary for the fulfillment of the legal obligation that applies to the controller in the sense of Article 6 paragraph 1 letter c) of the general regulation,
- it is necessary for the administrator's legitimate interest in the sense of Article 6 paragraph 1 letter f) of the general regulation.

### **PERSONAL DATA MANAGER**

#### **Venus investment services s.r.o.**

with registered office: U trezorky 921/2, 158 00 Prague 5

ID: 06635458

(hereinafter referred to as "Company" or "Administrator")

The administrator collects your personal data, disposes of them and is responsible for their proper and legal processing.

## **WHAT DATA WE PROCESS**

### **The following personal data are processed:**

- identification and contact data
- data on products and contracted services
- data on joint communication (whether it took place in person, in email, by telephone or otherwise)
- payment data (e.g. data on installments of purchase prices or amounts owed, account number, etc.)
- other specific data required to provide the agreed services

### **Information on the processing of personal data is also included**

- for marketing purposes
- for the purposes of concluding and fulfilling the contract

## **PROCESSING FOR THE PURPOSES OF CONCLUSION AND FULFILLING THE CONTRACT**

The legal reason for processing your personal data, namely identification data and contact information (in particular first and last name, academic degree, address, e-mail address, telephone, date of birth, address of permanent residence, account number) is the fact that this processing is necessary for the fulfillment of the contract between you and the Company, including the possible resolution of a complaint and rights arising from liability for defects of the sold item, as well as for the execution of measures by the administrator before the conclusion of such a contract.

We process your payment data, in particular your bank account number and your payment card data, for the purpose of identifying your payments.

The processing of data, such as your name and surname, address, information about the purchased services and their price, is necessary both in order to be able to bill you for the goods or services, and also in order to be able to fulfill the obligation to keep accounts so , as required by law.

The provision of your personal data is therefore a necessary requirement for concluding a contract with the controller and for its performance. Without their provision, it is not possible to conclude the contract or fulfill it on the part of the administrator.

## **PROCESSING FOR MARKETING PURPOSES**

For marketing purposes, we use the database of our existing customers, as well as the list of people who may yet become our customers. We have their name in this list and last name, phone number and email that we obtain from completed forms on the Company's website.

We send commercial communications by email, via the Internet and social networks.

When it comes to sending business communications by electronic mail to existing customers of the Company about the same or similar products or services of the Company, this is a use of personal data for which we do not need your consent. In other cases, these data are used on the basis of your consent to sending commercial messages.

## **RECIPIENT OF THE PERSONAL DATA**

Recipients of personal data to whom the controller may transfer your personal data in justified cases and to the necessary extent are in accordance with the provisions of legal regulations in specific cases: data subject, or client, public authorities, advisers based on a contract for the provision of services.

In order to ensure the purposes described above, personal data may be processed by processors in addition to the administrator, based on contracts for the processing of personal data concluded in accordance with the General Regulation on the Protection of Personal Data.

Personal data will not be transferred outside the territory of the European Union.

## **DATA PROCESSING TIME**

Personal data are processed and stored for the period necessary to achieve the purpose of their processing, in particular for the period during which the data subject is a client of the controller, and subsequently for a period of 5 years after he ceases to be a client, or for the period specified by law.

After this period, the administrator will dispose of your personal data, unless he is authorized or obliged to process this data on the basis of another legal title. Your personal data will also be processed by the administrator during the conduct of any legal disputes. Documents, in which your personal data is contained, the administrator will archive for the prescribed period in cases where it is required by law.

## RIGHTS OF THE DATA SUBJECT

Your rights in relation to data processing include:

- **the right to request access** to the personal data we process about you and the provision of copies of the processed personal data
- **the right to correct** processed personal data
- **the right to restriction of processing:** Restriction of processing means that the administrator marks the personal data for which processing has been restricted and does not process them further for the duration of the restriction, except for their storage. The data subject has the right to limit processing if
  - o denies the accuracy of the personal data, for the time required for the controller to verify the accuracy of the personal data
  - o the processing is unlawful and the data subject refuses the erasure of personal data and instead requests the restriction of their use
  - o the administrator does not need the personal data for processing purposes, but the data subject requires them for the determination, exercise or defense of legal claims
  - o raised an objection to the processing indicated below, until it is verified whether the administrator's legitimate reasons for processing outweigh the interests of the data subject or his rights and freedoms
- **the right to delete** personal data, especially if the data are no longer needed for the purposes for which they were collected, if consent to their processing has been revoked, or if the data has been processed unlawfully. However, the right to erasure does not apply, for example, if the processing is necessary for the determination, exercise or defense of legal claims.
- **the right to data portability:** The data subject may request that personal data be provided for the purpose of transferring it to another personal data controller, or that the controller himself transfer it to another personal data controller.
- **the right to file a complaint** with the Office for the Protection of Personal Data: Pplk. Sochora 27, 170 00 Prague 7, [www.uoou.cz](http://www.uoou.cz), in the event that the data subject believes that the processing of personal data violates legal regulations on the protection of personal data. He can file a complaint with the supervisory authority in his place of habitual residence.
- **the right to withdraw consent:** It is possible to withdraw consent to data processing in writing (in paper or electronic form) at the administrator's address listed above. You can quickly and easily unsubscribe from commercial communications at any time by using the unsubscribe link included in each such communication. However,

the withdrawal of your consent does not affect the legality of any processing carried out on the basis of previously granted consent before its withdrawal by you.

- **the right to object:** In the event that the client's personal data is processed for the purposes of the legitimate interests of the administrator or someone else, the data subject has the right to object to such processing at any time. The objection can be raised by the data subject at the address of the controller's registered office. If he raises such an objection, the administrator will be entitled to continue such processing only if we prove serious legitimate reasons for the processing.

## COOKIES USE POLICY

We collect some data automatically with your consent, for example using cookies, when you visit our website. Cookies help recognize the user's device and make it easier to log in and use the site. Thanks to them, we get feedback about the pages you visit so that we can assess the effectiveness of our pages and continue to improve and personalize them for you. Cookies are used to improve the functioning of websites, to evaluate their traffic and for the purpose of better targeting of marketing activities.

The technology of creating personalized content and advertising therefore allows us to display our advertisements to visitors who have already expressed interest in our website or services. We try to show you only the ad that you are really interested in, and not advertising without any link to your person and interests.

You can find more information about the processing of cookies on the page:

<https://policies.google.com/technologies/cookies?hl=cs>

In order to exercise your rights or in case of any questions or complaints, you can contact the administrator by post at U trezorky 921/2, 15800 Prague 5 or by e-mail at [info@venusgroup.cz](mailto:info@venusgroup.cz).