

INSTRUCTIONS ON THE PROCESSING OF PERSONAL DATA BY DATA SUBJECTS  
IN THE FRAMEWORK OF DELIVERIES OF GOODS

an online store available at spvgsystems.com

operated

trading company

SPVG Systems s.r.o.

IČO: 26965542, DIČ: CZ26965542, with its registered office at Čichnova 1294 / 23a, Komín, 624 00  
Brno

entered in the Commercial Register under file no. No. C 48721 kept at the Regional Court in Brno  
(hereinafter also referred to as "Instruction")

## 1. INTRODUCTORY PROVISIONS

### 1.1. Online store and Seller

1.1.1. The Internet shop (hereinafter also referred to as the "**Internet shop**") available on the spvgsystems.com domain (hereinafter also referred to as the "**Domain**") is operated by SPVG Systems sro, IČO: 26965542, DIČ: CZ26965542, with its registered office at Čichnova 1294 / 23a, Komín, 624 00 Brno, entered in the Commercial Register under file no. No. C 48721 kept at the Regional Court in Brno (hereinafter also referred to as the "**Seller**").

1.1.2. As part of the operation of the Internet Store, personal data of persons who have concluded a purchase agreement with the Seller (hereinafter also referred to as the "**Agreement**") for goods offered in the Internet Store or who have created a user account in the Internet Store is processed if this functionality is available on the Domain ( hereinafter also referred to as the "**User Account**"). These persons are collectively referred to hereinafter as the "**Buyer**".

### 1.2. Personal data of the Buyer and their categories

1.2.1. Within the framework of negotiating the Contract and fulfilling the rights and obligations arising from it, personal data of persons who have concluded a Contract with the Seller are processed, namely personal data relating to:

a) natural persons who, as the end customer - the Buyer, have entered into an Agreement with the Seller;

b) natural persons who, on behalf of the Buyer - legal entity, have concluded a Contract with the Seller or who have been listed by the Buyer - legal entity as a contact person in connection with the Contract;

collectively hereinafter referred to as "**Data Subjects**" or individually as "**Data Subject**".

1.2.2. The Seller processes the following personal data provided by (i) a natural person who is the Buyer, ie a person pursuant to Article 1.2.1 letter a) of this Instruction: title, name and surname, address of residence / registered office, ID number (if assigned), VAT number (if assigned), e-mail address, telephone number, bank account number (if payment of the purchase price for goods, which is the subject of the Contract, made by bank transfer) and the following personal data provided by (ii) the Buyer - a legal entity regarding a natural person representing the Buyer in the sense of Article 1.2.1 letter. b) of this Instruction: title, name and surname, e-mail address, telephone number, identification of the legal entity - Buyer (company name), ID number of the legal entity - Buyer, VAT number of the legal entity - Buyer (if assigned), registered office of the legal entity - Buyer, the bank account number of the legal entity - Buyer (if the payment of the purchase price for the goods that are the subject of the Contract was made by bank transfer) (hereinafter collectively referred to as "Personal Data").

1.2.3. Personal data belongs to the category of address, contact and identification data, ie they enable the Buyer to identify, contact him, identify the Buyer's orders and send him a message and goods that are the subject of the Contract.

### **1.3. Purpose of the presented Instruction**

1.3.1. This Instruction was prepared by the Seller as a controller of Personal Data in order to fulfill the obligations to inform Data Subjects about the circumstances of processing in the performance of contractual obligations, or promotion of the Seller within the meaning of Articles 13 and 14 of Regulation (EU) No. 2016/679 persons in connection with the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (the so-called General Data Protection Regulation, hereinafter "the Regulation" or the "GDPR").

## **2. PURPOSE AND BASIS OF THE PROCESSING OF PERSONAL DATA**

2.1. The Seller processes the Personal Data of the Data Subject for the purposes of exercising the rights and obligations under the Agreement and for the purposes of maintaining the User Account, ie for recording orders placed by the Buyer within the Internet shop, on the basis of which the Agreement and their settlement are concluded. within the so-called direct marketing, which are mainly e-mail messages with product offers and information about the news of the Internet shop, which are sent to the e-mail addresses of the Buyer's e-mail.

2.2. The legal basis for the processing of Personal Data is the Agreement and the User Account Agreement and the Seller's legitimate interest in direct marketing, ie communication of information on the offer of goods and services available in the Online Store and information on news related to the operation or content of the Online Store.

## **3. INFORMATION ON THE CONDITIONS OF PROCESSING OF PERSONAL DATA BY THE SELLER**

3.1. The Seller is entitled to process the Personal Data of the Entity data manually or to automate it through its own employees or third parties providing the Seller with services enabling the operation of the online store (especially by processing the e-shop web hosting service provider and processing Personal Data). Personal data will be processed in the form of secure databases.

3.2. The Seller processes personal data by means of organizational, physical and software security means, in particular by setting access rights of employees (or cooperating third parties) to the relevant software, physical security space of the Seller and data carriers and software protection against unauthorized access to data via the Internet. The seller is also subject to compliance with the above principles after the processing of personal data, especially the provision of IT services necessary for the operation of the online store. The principles of general data and information security are set out in a separate document by the Seller.

## **4. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL DATA**

4.1. The Recipient of Personal Data is the Seller, its employees, persons cooperating with the Seller for the performance of the Contract, ie in particular a consignment of goods which is the subject of the contract and another person providing the Seller with IT services (especially web hosting and administration services) for internet operation.

## **5. PERIOD OF STORAGE OF PERSONAL DATA**

5.1. The Buyer's personal data is processed by the Seller for the duration of the existence of the User Account, or for the period when it is necessary to fulfill the obligations under the Contract, or until the

full settlement of all rights and obligations under the Agreement, in accordance with this, which of the above periods will end later.

## **6. BUYER'S RIGHTS IN RELATION TO PERSONAL DATA**

6.1. Each Data Subject has the right to demand from the Seller in relation to Personal Data about himself:

a) right of access to his Personal Data - the Data Subject has the right to request the Seller to provide him with access to his Personal Data processed in the sense of this document in the form of a statement of all processed Personal Data in relation to individual processing purposes. The data subject is also entitled to request information about the processors processing his Personal Data on the basis of an agreement with the Seller;

b) the right to explain and correct his Personal Data - in the event that the Data Subject believes that the Seller is processing his Personal Data in violation of this document (especially with the purposes and legal bases identified here) or with legal regulations, he is entitled to the Seller request an explanation and a remedy. If the Seller processes inaccurate personal data of the Data Subject, the Data Subject is entitled to request their correction;

c) the right to delete his Personal Data - the Data Subject is entitled to request from the Seller the deletion of his Personal Data if: (i) such personal data ceases to be necessary for the specified purposes of processing, or (ii) the Data Subject has revoked its consent to the processing of personal data (if previously granted) and there is no other reason for such processing, or (iii) the Data Subject has objected to the processing of Personal Data and there are no overriding reasons for processing, or (iv) the data must be deleted to fulfill Seller's legal obligation, or (v) Personal Data has been processed illegally;

d) the right to restrict the processing of its Personal Data - the Data Subject is entitled to require the Seller to restrict the processing of Personal Data in the following cases: (i) The Data Subject denies the accuracy of the Personal Data processed, for the time necessary for the Seller to verify, (ii) the processing of Personal Data is illegal according to the Data Subject and he refuses to delete the Personal Data, (iii) the Seller does not need the Personal Data for the specified purposes of processing, but the Data Subject requires it to determine, enforce or defend legal claims;

e) the right to raise an objection to the processing of Personal Data - in the case of processing Personal Data necessary for the performance of a task performed in the public interest (Article 6 (1) (e) of the GDPR) or for the purposes of legitimate interests of the Seller (Article 6 (1) (e). f) GDPR) the Data Subject is entitled to object to the processing of his Personal Data, provided that he also states the reasons relating to his specific situation. Based on the objection, the Seller is obliged to terminate the processing of Personal Data, unless it proves that the reason for processing consisting in the protection of its interests outweighs the interests and freedoms of the Data Subject;

f) the right to data portability - the Data Subject has the right to obtain Personal Data concerning him provided to the Seller in a structured, commonly used and machine-readable format, and the right to transfer this data to another controller without the Seller's hindrance, namely where (i) the processing is based on consent pursuant to Article 6 (1) (a); (a) or Article 9 (2) (a) (a) the GDPR or in the contract referred to in Article 6 (1) (a); b) GDPR and at the same time (ii) data processing (Personal Data) is performed automatically. In exercising its right to data portability under the previous sentence, the Data Subject has the right to have the Personal Data transferred directly by the Seller to another

controller of Personal Data, if technically feasible. The exercise of this right must not adversely affect the rights and freedoms of others.

## **7. POSSIBILITY OF SUBMITTING A COMPLAINT TO THE SUPERVISORY AUTHORITY**

7.1. The data subject has the right to lodge a complaint with the supervisory authority regarding personal data if he considers that the processing of his Personal Data has violated the GDPR. The supervisory authority for Data Subjects residing in the Czech Republic is the Office for Personal Data Protection (available, inter alia, at the Internet address: <http://www.uoou.cz>).

## **8. FINAL PROVISIONS**

8.1. In the event that the Seller starts processing Personal Data provided by Data Subjects for purposes other than those arising from this document, (i) immediately inform the relevant data subjects (Data Subject or Buyer - legal entity that provided information about the Subject). (ii) inform them of the individual aspects of the processing and (iii) if the data subject's consent is required for the processing for this purpose, the data subject shall request such consent before the start of the processing. In the event that the Data Subject does not give consent, the Seller is not entitled to start further processing of Personal Data, unless another legal basis for processing is given.

8.2. This document is provided to Data Subjects (and if in a given specific case they differ from the Buyer, then also to the Buyer) in electronic form before sending the order, on the basis of which the Agreement is concluded within the Online Store or a User Account is established within the Online Shop available on the website of the Internet Shop, where it is continuously available to all Data Subjects. The Buyer - a legal entity that has provided data on the Data Subject is obliged to acquaint such Data Subject with this Instruction.