

## **Privacy Policy**

### **I. Basic Provisions**

- The controller of personal data, pursuant to Article 4(7) of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter: “**GDPR**”), is Symmy.com s.r.o., with its registered office at Nové sady 988/2, Staré Brno, 602 00 Brno (hereinafter: the “**Controller**”).
- The contact details of the Controller are: Address: Nové sady 988/2, Staré Brno, 602 00 Brno Email: [info@symmy.com](mailto:info@symmy.com)
- Personal data means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
  - The Controller has not appointed a Data Protection Officer.

### **II. Sources and Categories of Processed Personal Data**

- The Controller processes personal data that you have provided to them or personal data that the Controller has obtained as a result of fulfilling your order.
  - The Controller processes your identification and contact details, and data necessary for the performance of a contract.

### **III. Legal Basis and Purpose of Personal Data Processing**

- The legal basis for the processing of personal data is:
  - performance of a contract between you and the Controller pursuant to Article 6(1)(b) of the GDPR,
  - the legitimate interest of the Controller in providing direct marketing (especially for sending commercial communications and newsletters) pursuant to Article 6(1)(f) of the GDPR,
  - your consent to processing for the purposes of providing direct marketing (especially for sending commercial communications and newsletters) pursuant to Article 6(1)(a) of the GDPR in conjunction with Section 7(2) of Act

No. 480/2004 Coll., on Certain Information Society Services, in the event that no goods or services have been ordered.

- The purpose of personal data processing is:
  - to process your order and to exercise the rights and obligations arising from the contractual relationship between you and the Controller; when placing an order, personal data is required that is necessary for the successful processing of the order (name and address, contact information), the provision of personal data is a necessary requirement for the conclusion and performance of the contract, without the provision of personal data it is not possible to conclude the contract or for it to be performed by the Controller,
  - sending commercial communications and conducting other marketing activities.
- The Controller does not engage in automated individual decision-making within the meaning of Article 22 of the GDPR. You have provided your explicit consent for such processing.

#### **Services Used by the Controller for Handling Personal Data:**

<b>Service</b>	<b>Provider Website</b>	<b>Purpose</b>
Raynet	<a href="https://raynet.cz">https://raynet.cz</a>	Contact storage and management
Ecomail	<a href="https://ecomail.cz">https://ecomail.cz</a>	Email and marketing communication
POHODA	<a href="https://www.pohoda.cz">https://www.pohoda.cz</a>	Accounting and business management system
Vyfakturuj	<a href="https://www.vyfakturuj.cz">https://www.vyfakturuj.cz</a>	Invoicing

#### **IV. Data Retention Period**

- The Controller stores personal data:
  - for the period necessary to exercise the rights and obligations arising from the contractual relationship between you and the Controller and to assert claims from these contractual relationships (for a period of 15 years from the termination of the contractual relationship).
  - for the period until consent for the processing of personal data for marketing purposes is withdrawn, but no longer than 5 years, if the personal data is processed based on consent.
- After the data retention period has expired, the Controller shall erase the personal data.

#### **V. Recipients of Personal Data (Sub-processors of the Controller)**

- The recipients of personal data are persons:
  - involved in the delivery of goods / services / execution of payments under a contract,
  - involved in ensuring the operation of services,
  - providing marketing services.
- The Controller does not intend to transfer personal data to a third country (a country outside the EU) or to an international organization. Recipients of personal data in third countries are providers of mailing services / cloud services.

## **VI. Your Rights**

- Under the conditions set out in the GDPR, you have:
  - the right of access to your personal data pursuant to Article 15 of the GDPR,
  - the right to rectification of personal data pursuant to Article 16 of the GDPR, or restriction of processing pursuant to Article 18 of the GDPR.
  - the right to erasure of personal data pursuant to Article 17 of the GDPR.
  - the right to object to processing pursuant to Article 21 of the GDPR, and
    - the right to data portability pursuant to Article 20 of the GDPR.
  - the right to withdraw consent to processing in writing or electronically to the address or email of the Controller specified in Article III of these terms.
- You also have the right to lodge a complaint with the Office for Personal Data Protection if you believe that your right to personal data protection has been violated.

## **VII. Terms of Personal Data Security**

- The Controller declares that they have taken all appropriate technical and organizational measures to secure personal data.
- The Controller has taken technical measures to secure data storage and storage of personal data in paper form, in particular...
- The Controller declares that only persons authorized by them have access to personal data.

## **VIII. Final Provisions**

- By submitting a form from the website, you confirm that you are familiar with the terms of the privacy policy and that you accept them in their entirety.

- You agree to these terms by checking the consent box via the online form. By checking the consent box, you confirm that you are familiar with the terms of the privacy policy and that you accept them in their entirety.
- The Controller is entitled to change these terms. The new version of the privacy policy will be published on their website, and they may also send you the new version of these terms to the email address you have provided to the Controller.

These terms shall take effect on November 25, 2023.