



# PRIVACY POLICY

(hereinafter also referred to as the “**Document**”)

## BASIC INFORMATION

**ANDO TRANSLATIONS, s.r.o.**, with its registered office at Úvoz 523/19, Staré Brno, 602 00 Brno, company number: 26264285, registered in the Commercial Register maintained by the Regional Court in Brno, file ref. C 39810 (the “**Company**”), processes your personal data provided in accordance with the regulation 2016/679 of the European Parliament and the Council (EU) of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the “**Regulation**”), and other legislation related to data protection. The lawfulness of the processing and security of personal data is one of the Company's key priorities.

Within the meaning of the Regulation, the Company acts mainly as a personal data controller. The Company collects, stores, uses and otherwise processes personal data, namely for the purpose of carrying out its business activities, which consist mainly of translation and language services, such as proofreading.

This Document explains how we collect, process and protect your personal data during the course of the business relationship or other relationship with you, our clients and suppliers, during communication with you by email or telephone, during the use of this website ([www.ando.cz](http://www.ando.cz)), and in other cases where the Company processes your personal data in its capacity as the controller of your personal data.

Your personal data is processed by the Company only to the extent and for the time necessary under the conditions set out below.

## CATEGORIES OF YOUR PERSONAL DATA WE PROCESS

The Company processes the following categories of your personal data:

**Identification data** - particularly name, surname, date of birth, address, domicile, registered office, company and VAT numbers in case of an entrepreneur, identity card number, birth certificate number, other document number.

**Contact data** - phone number, email address, delivery address.

**Billing and payment details** - payment account number, billing address, and other data required for payment and billing.

**Data relating to your orders** - particularly data about the services you have ordered, delivery data, payment data, data relating to complaints.

**Information about mutual communication** - email messages, and other messages sent by you.

**Information about your behavior on our website** - particularly, data about the displayed goods, visited links, data about your device which you view the website from: IP address and derived location, device identification, device specifications, screen resolution, browser and its version.

## WHAT PURPOSES DO WE PROCESS YOUR DATA FOR?

The Company processes and retains the above categories of your personal data only for the following purposes:

- (a) **Execution of contracts, including their negotiation.** We collect and process your personal data for the purposes of entering into contracts or orders with you, to know who we enter into these contracts with, and also to ensure that we meet our obligations under these contracts.
- (b) **Meeting legal obligations.** The Company retains and processes your personal data for the purpose of meeting our legal obligations, primarily our obligations within the meaning of accounting, tax and archiving laws (particularly the obligations arising from the Act No. 563/1991 Coll., on Accounting, Act No. 634/1992 Coll., on Consumer Protection, Act No. 235/2004 Coll., on Value Added Tax, and others).
- (c) **Protection of the legitimate interest of the Company or third parties** within the meaning of Article 6(1)(d) and (f) of the Regulation. It is a legitimate interest of the Company to process the data for the purpose of preventing or reporting criminal acts against the Company, particularly the criminal act of fraud.
- (d) **Handling requests submitted to the Company.** For this purpose, we process your personal data typically to enable the communication with you about your requests for information regarding the services, to deal with further inquiries, and the like.

## SCOPE OF PROCESSING

The Company processes your personal data only to the extent necessary to meet any of the above-mentioned processing purposes.

## LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA

As part of its activities, the Company processes personal data for the above-mentioned purposes, and to the above-mentioned extent either:

- (a) **without your consent** primarily for the execution of contracts entered into with you, for meeting the legal obligations imposed on us by law, or for the protection of the legitimate interests of the Company or third parties, and, where applicable, for other reasons where the Company is not required to obtain your consent by the law; or
- (b) **with your consent** in other cases (particularly the processing of your personal data for marketing purposes).

The legal basis for the above-mentioned purposes of processing and retaining of your personal data is therefore: in the case under (a), a legal reason allowing the processing of personal data for the purpose of meeting legal obligations without your consent; in cases under (b), the legal basis is your consent to the processing and retaining of your personal data.

## ADDITIONAL INFORMATION ABOUT PROCESSING

### Retention period of your personal data

The Company processes and retains your personal data only for the time necessary for the given purpose of processing:

- (a) **Execution of contracts, including their negotiation.** In this case, the Company retains your personal data for the duration of the contractual relationship between you and the Company, and for a maximum of 10 years since the termination of such a contractual relationship.
- (b) **Meeting legal obligations.** The Company retains your personal data to meet its obligations in the meaning of accounting, tax, archiving and other legislation (i.e. laws). In this case, the Company retains your personal data no more than the period specified by the applicable law.
- (c) **Protection of the legitimate interest of the Company or third parties.** In this case, the Company retains and processes your personal data as long as necessary to ensure the protection of the legitimate interest, which is always in accordance with the data protection legislation.
- (d) **Handling requests submitted to the Company.** In this case, the Company retains your personal data for a maximum period of 1 year, unless such data is also retained for another purpose specified in this Document.
- (e) **Marketing and business offers from the Company.** For this purpose, the Company processes and retains your personal data only until your consent to the processing of personal data is withdrawn, but no longer than 5 years after obtaining such consent.

### Recipients of your personal data

The Company discloses your personal data only to authorized persons employed by the Company, members of the Company's authorized body, and persons in other similar positions who carry out the Company's activities related to the personal data processing.

The Company may also disclose your data outside the Company to individual personal data processors contracted by the Company, or to other data controllers, but only to the extent necessary to meet the above-mentioned individual processing purposes, and on the basis of the corresponding legal right to the personal data processing.

In relation to the execution of specific contracts related to the services provided by the Company, your personal data may be provided to:

- (a) carriers who transport goods or services for the Company;
- (b) institutions providing payment services;
- (c) collection points and their operators.

In connection with the operation of the Company's website and data storage facilities, your personal data may be provided to:

- (a) cloud service providers;
- (b) providers of related processing software and applications.

**Potential intention of the controller to transfer personal data to a third country (outside the EU) or an international organization (pursuant to Article 13(1)(f) of the Regulation)**

The Company may transfer personal data for processing to a third country (non-EU country) or an international organization.

The recipients of personal data in third countries are providers of cloud and analytic services and global IT support. The recipients of personal data in third countries may be carriers or institutions performing payment services if deliveries abroad are performed.

The transfer of your personal data takes place only on the basis of standard contractual clauses of the European Commission, which ensure that the processing of your personal data in countries outside the European Union is carried out in accordance with the Regulation and other European Union legislation.

**Personal data sources**

The Company obtains personal data directly from you (particularly from executed contracts and orders, completed questionnaires, email communication, CVs, by completing the form available on the website, etc.); the Company may also obtain personal data from public registers (e.g. commercial and trade register, public internet databases) or other sources (e.g. social networks on the internet) for the processing purposes set out in this Document, if necessary, but always in accordance with the Regulation and other legal provisions and, where your consent is required by law, only with your consent. In connection with the processing of your orders, the Company may also obtain some personal data from third parties, such as banks and payment system providers (payment account number data), carriers (delivery and acceptance data).

**Automated decision-making and profiling**

The Company does not use your personal data to make automated decisions based on your data, or to profile you according to the obtained personal data.

**Cookies**

Cookies are small text files created by a web server and stored on your device via your web browser. When you eventually return to the same website, your web browser sends the stored cookie back, and the server thereby retrieves the information it previously stored in your cookie.

**What do we use cookies for?**

Some cookies are necessary for our website to work properly for you ("**technical cookies**"). Therefore, if you block cookies in your web browser, it is possible that you will not be able to view our website correctly, or that it will not function properly because technical cookies cannot be stored.

**We do not use any other cookies** on our website (e.g. cookies to track the traffic, measure the effectiveness of advertising or cookies for statistical purposes).

## **YOUR RIGHTS WHEN PROCESSING PERSONAL DATA**

As a personal data subject, you have all the rights granted by the Regulation and other legal regulations.

These are primarily the following rights, which you can exercise against the Company as the controller of your personal data:

- **The right to information about the processing of your personal data for all of the above-mentioned purposes**, through which you can obtain information, particularly about if your personal data is processed, for what purpose, what is the scope of the processed data, and, if applicable, if and who your personal data has been disclosed to, if relevant. You may also be provided with a copy of the processed personal data.
- **The right to rectification** - this is your right to rectify your inaccurate or incorrect personal data, or to complete incomplete personal data processed by the Company.
- **The right to erasure** - the right to the erasure of your personal data may particularly arise if your personal data is no longer necessary for the purpose of processing. In case of data processed with your consent, this right to erasure fundamentally arises at the time of withdrawal of this consent, unless there is another legal reason for the processing of your personal data. This right to erasure also arises if your personal data is processed illegally, and in other cases listed in Article 17 of the Regulation. The Company will delete your personal data without delay, even without a request, if there are grounds for this right to erasure.
- **The right to restriction of the processing of your personal data** - you have the right to have the Company restrict the processing of your personal data in cases under Article 18 of the Regulation, where the right can be exercised, for example, in a situation where you refuse the erasure of your data for various reasons, and instead request a restriction of its processing, or in case where, at your request, the Company verifies the accuracy of the personal data you deny, or during the period when, at your objection, the Company verifies if there are grounds for the erasure of your personal data.
- **The right to data portability** - on request from the Company, you may obtain the provided personal data in a structured and machine-readable format, either for yourself, or for another data controller, under the conditions set out in Article 20 of the Regulation.
- **The right to ensure that your personal data is not used by the Company for any automated decision-making** (however, the Company does not use your personal data for automated decision-making).
- **The right to withdraw consent to the processing of your personal data** - if you have given your consent to the Company to process your personal data, you have the right to withdraw your consent at any time. In this case, your data, which are processed on the basis of your consent within the meaning of Article 6 a) of the Regulation, will be erased without undue delay after the withdrawal of this consent.
- **The right to object** - if you believe that the Company is processing your personal data outside the law, you have the right under Article 21 of the Regulation to object to such processing of your personal data by sending an email to [ando@ando.cz](mailto:ando@ando.cz), or in writing to the above-mentioned address of the Company's registered office.

You may exercise the aforementioned rights against our Company in writing (or orally, where a written record of the exercise is made), subject to proving your identity, either at the above-mentioned address of the Company's registered office, or by email to [ando@ando.cz](mailto:ando@ando.cz). You will be informed in writing of the measures taken or not taken without undue delay, but within one month at the latest. However, within the meaning of Article 12(3), this time limit may be extended, if necessary, and with respect to the

complexity of the application. Requests are handled by the Company free of charge, unless they are manifestly ill-founded or unreasonable.

**The right to apply to a supervisory authority.** In any case where you believe that your personal data is being illegally processed, you may lodge a complaint with a supervisory authority. Such a supervisory authority for the Czech Republic is the Office for Personal Data Protection, located at Pplk. Sochora 27, 170 00 Prague 7, Czech Republic, [www.uoou.cz](http://www.uoou.cz).

Please note that the Company may reject ill-founded or unreasonable (especially repetitive) requests, or impose an adequate fee factoring into administrative costs. However, we would always inform you of this fact in advance.

We are available for any additional questions.

**ANDO TRANSLATIONS Team**