



# PERSONAL DATA PROCESSING POLICY

of **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

## TERMS AND ABBREVIATIONS USED

Unless stated otherwise, the terms used in this text have the following meanings:

<b>Company</b>	shall mean <b>ANDO TRANSLATIONS, s.r.o.</b> , 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
<b>GDPR</b>	shall mean 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 (General Data Protection Regulation).
<b>Personal data</b>	shall mean any information that can identify a specific natural person, directly or indirectly. Possible identifiers of a natural person include, for example, name, identification number, location data, network identifier, or other specific elements of the natural person's physical, physiological, genetic, psychological, economic, cultural or social identity. These identifiers may not always be considered personal data, and their nature must always be considered in the context of the entire database of personal data. The decisive factor is whether a specific person can be identified through the individual identifiers.
<b>Personal data subject (or data subject)</b>	shall mean any natural person identified or identifiable through personal data.
<b>Controller</b>	shall mean a natural or legal person, public authority, agency, or other subject, which alone or jointly with others determines the purposes and means of the personal data processing.
<b>Processor</b>	shall mean a natural or legal person, public authority, agency, or other subject, which processes personal data for the Controller.

**Processing**

shall mean any operation or set of operations, which is performed upon personal data or sets of personal data, whether or not by means of automated processes, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or any other disclosure, sorting or combination, restriction, erasure or destruction.

**Website**

shall mean the website available at [www.ando.cz](http://www.ando.cz).

**Purpose of personal data processing**

shall mean the reason why the personal data is processed (such as the execution of a contract, the administration of user accounts, the handling of incentives and complaints, the sending of commercial communication, or the display of advertisements based on the interests of the data subject).

## CATEGORIES OF PROCESSED PERSONAL DATA

- 1.1. The Company processes particularly the following personal data or categories of personal data:
- a) *identification and address data*: e.g. name, surname, delivery or other contact address, address of the place of purchase, registered office, company number, VAT number;
  - b) *electronic contact data*: e.g. phone number, email address;
  - c) *other electronic data*: IP address;
  - d) *other personal data related to the contractual relationship*: bank account number, history of orders;
  - e) *other personal data*: data provided by the data subject in the contact form or other documents, and mutual communication, including subsequent updates.

## 2. PERSONAL DATA ORIGIN

- 2.1. The Company processes personal data, which are communicated to it by the data subject, for example, when ordering services or communicating with each other, or by completing a form available on the website. Particularly, these include:
- identification and address data;
  - electronic contact data;
  - other personal data related to the contractual relationship.
- 2.2. Furthermore, the Company processes personal data, which it obtains automatically on the basis of browsing the website. Typically, these include:
- IP address;
  - access date and time;
  - http and https response code;
  - transmitted data groups;
  - data about the browser and computer operating system.

## 3. PURPOSE OF PERSONAL DATA PROCESSING

- 3.1. Personal data may be processed for the following purposes:
- execution of the contractual relationship;
  - communication with data subjects, evaluation of satisfaction, publication of reviews, recommendations, handling of incentives and complaints;
  - sending commercial communications and offers of services;
  - improving the quality of services, analyzing website traffic and data subject behavior on the website;
  - protection the Company's rights, property or safety, or the rights, property or safety of others;
  - accounting and tax purposes;
  - meeting other legal obligations.

3.2. Personal data may be processed based on the following legal purposes:

- execution of the contract;
- meeting a legal obligation;
- the Company's legitimate interest in sending commercial communication;
- consent to receive commercial communications.

3.3. The personal data processing for the purposes of execution of a contractual relationship, accounting and tax purposes and meeting other legal obligations are legal or contractual requirements.

#### **4. PERIOD OF PERSONAL DATA PROCESSING**

4.1. Personal data is processed:

- for the period necessary to exercise the rights and obligations arising from the contractual relationship between the personal data subject and the Company, and to assert claims arising from these contractual relationships, but no longer than 10 years since the termination of the contractual relationship;
- for the period necessary to meet the legal obligation, i.e. for the period stipulated by relevant legal regulations;
- for the duration of the Company's legitimate interest in sending commercial communication, but no longer than 5 years since the last opening of commercial communication;
- for the duration of the data subject's consent, but no longer than 5 years since the date of consent, or 5 years from the last order.

#### **5. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES**

5.1. The Company may disclose personal data to any of its employees, officers, insurance companies, professional advisors, translators, contractors, or subcontractors, pursuant to a contract with such a third party. When personal data is provided to a third party, the Company undertakes to ensure that the personal data is handled in accordance with this policy.

5.2. In addition, the Company may disclose personal data to any member of its group of companies, i.e. subsidiaries, the main holding company, and any of its subsidiaries, as reasonably necessary for the purposes set out in this policy.

5.3. Personal data may be disclosed by the Company:

- to the extent it is obliged to do so by law;
- in connection with any ongoing or future legal proceedings;
- to establish, exercise or defend the Company's legal rights.

## 6. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN UNION

- 6.1. The Company does not intend to transfer personal data to third countries, i.e. countries outside the European Economic Area, or to an international organization.

## 7. METHOD OF PERSONAL DATA PROCESSING

- 7.1. Personal data is processed both manually and automatically, particularly by collection, recording, structuring, alteration or use. The Company keeps proper records of all processing activities in accordance with applicable law.
- 7.2. The personal data subject is not the subject of any decision based solely on automated processing, including profiling, which would have legal effects for them, or which would affect them in a similarly significant manner.

## 8. CONDITIONS OF PERSONAL DATA SECURITY

- 8.1. The Company has taken all appropriate technical and organizational measures to secure personal data.
- 8.2. The Company has taken technical measures to secure data storage and personal data storage in paper form.
- 8.3. Only persons authorized by the Company have access to personal data.

## 9. DATA SUBJECTS' RIGHTS

- 9.1. In exercising their rights, personal data subjects may contact the Company using the following contact details:

**address:**

ANDO TRANSLATIONS, s.r.o.

Úvoz 523/19

602 00 Brno

**email:** ando@ando.cz

**phone:** +420 541 235 718

- 9.2. In connection with personal data processing, the data subject has the following rights, in accordance with Articles 15 to 21 of the GDPR:
- the right to access personal data;
  - the right to rectification of inaccurate and completion of incomplete personal data;
  - the right to erasure of personal data;
  - the right to limit the personal data processing;
  - the right to data portability;
  - the right to object to processing;
  - the right to information about automated decision-making, including profiling.

- 9.3. If personal data is processed on the basis of the consent of the data subject, the data subject has the **right to withdraw such consent at any time**.
- 9.4. Furthermore, the personal data subject has the right to **lodge a complaint with a supervisory authority**, which is the Office for Personal Data Protection, located at Pplk. Sochora 27, 170 00 Prague 7, phone: 234 665 111, website: [www.uoou.cz](http://www.uoou.cz).

## 10. CONCLUSION

Both the legislation and the Company's business strategy and related personal data processing may change. If the Company decides to update this policy, it will post the changes on the website, and inform data subjects of the changes. In cases where there is to be a major change to this policy, or where required by law, the Company will inform personal data subjects in advance.