

# **Personal Data Protection Policy**

*(the "Policy")*

## **1. INTRODUCTION**

- 1.1. This Policy regulates the rules of collecting and processing of personal data via STONEE mobile application.
- 1.2. The personal data is controlled by StoneeApp, s.r.o, Nákladní 865, 460 07 Liberec 3 - Jeřáb, Company ID: 09751891, incorporated in the commercial register of the Regional Court in Ústí nad Labem, under file No. C 46330 (the "Controller").
- 1.3. The data protection officer is Martin Tomas.
- 1.4. This Policy is governed by applicable law, especially by Regulation (EU) 2016/679 of the European Parliament and of the Council 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) (the "GDPR").
- 1.5. This Policy is aimed at informing users which data and for which reason is collected and in which manner the data is used.

## **2. PERSONAL DATA**

- 2.1. 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.
- 2.2. The Controller processes the personal data for lawful reasons:
  - performance of an agreement made between you and the Controller under Art. 6(1)(b) of GDPR,
  - legitimate interest pursued by the Controller for providing direct marketing (especially for sending commercial communications and newsletters) under Art. 6(1)(f) of GDPR,
- 2.3. The Controller determines the purposes and means of the processing of personal data via the mobile application. The purpose of the processing is especially:
  - processing of your registration and exercise of the rights and obligations resulting from the agreement made between you and the Controller; for that purpose, you are required to provide personal data as stated in Art. 2.4 hereof. Such data is necessary for completion of the registration, which ensures proper functionality of the mobile application. If the personal data is not provided, the registration cannot be completed and the agreement cannot be made or performed by the Controller.
  - Sending commercial communications and other marketing activities.
- 2.4. Based on consent of the users, the Controller collects, processes, keeps and protects the following personal data of the users:
  - Name
  - Last name
  - Sex
  - Region
  - Post code
  - E-mail address

- Profile picture
- User geolocation data (GPS location when taking a picture)
- Pictures taken by the user and uploaded to the application containing the personal data
- Language of the mobile phone

### **3. TIME LIMITS**

- 3.1. With regard to a general limitation period, the personal data processed for the purposes of the mobile application is kept for 3 years after the user's registration is terminated.
- 3.2. The personal data processed for marketing purposes is kept for 2 years after the last consent has been granted.
- 3.3. If the user withdraws his consent to the processing of personal data and if there is no lawful reason for the processing of personal data, the Controller terminates the processing without undue delay.

### **4. PROCESSING**

- 4.1. The personal data is always processed by the Controller or by the processor exclusively in accordance with the law and with the consent granted by the users.
- 4.2. The scope of processing of personal data complies with the law and the consent granted by the user.
- 4.3. The personal data may be further provided to the following recipients:
  - external workers, suppliers for the purposes of performance of a contract, and thus:
    - marketing and research agencies for the purposes of marketing processing or researches. For the purposes of trade, services and products of certain partners;
    - operators of advertising systems in connection with targeted advertising;
    - providers of necessary services for the performance of the operator's activities and functionality of the mobile application (GOOGLE, APPLE).

### **5. PROCESSORS**

- 5.1. The user acknowledges and expressly agrees that the personal data may be processed by third parties under the conditions stipulated herein.
- 5.2. The Controller treats the personal data as confidential, except for those included herein.
- 5.3. The third parties which are provided with your personal data entered into a contract with us based on which we are able to secure and protect your rights to the protection of personal data.

### **6. USER'S RIGHTS**

- 6.1. At any time during the processing of the personal data, the user has:
  - a right of access to his personal data under Art. 15 of GDPR,
  - a right to rectification of personal data under Art. 16 of GDPR, or restriction of processing under Art. 18 of GDPR;
  - a right to erasure of personal data under Art. 17 of GDPR;
  - a right to object to processing under Art. 21 of GDPR;
  - a right to data portability under Art. 20 of GDPR;
  - a right to withdraw the consent to processing in a written or electronic form to the address or e-mail address of the Controller stated in Art. 1 hereof.
- 6.2. The user is entitled to file a complaint with the Office for Personal Data Protection.

## **7. PLACE OF RETENTION OF DATA**

- 7.1. The data is kept on backed up servers via Google Cloud. The data centre is secured in full compliance with GDPR.
- 7.2. The Controller represents that the Controller took all appropriate technical and organizational measures to secure the personal data.

## **8. FINAL PROVISIONS**

- 8.1. By downloading the mobile application to a mobile device and by registration, the User agrees with this Policy.
- 8.2. The operator is entitled to amend this Policy and its updated version will always be available on the website of the operator - [www.stonee.eu](http://www.stonee.eu).
- 8.3. The compliance with GDPR is controlled by the Czech Office for Personal Data Protection.

This Policy comes into effect on 1 April 2021.