

PRIVACY POLICY

prepared in accordance with 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, within the sense of Articles 13 and 14 of the Regulation (hereinafter the “GDPR”) and Act No 110/2019 on personal data processing (hereinafter the “Act on Personal Data Processing”)

Who processes your data?

The controller:

Master Therm tepelná čerpadla s.r.o.

Praha 1 - Nové Město, Václavské náměstí 819/43, postcode 11000

Business ID number: 288 92 275

Registration: C 151453, maintained by the Municipal Court in Prague

Email: info@mastertherm.cz

Telephone number: +420 800 444 000

hereinafter "we" or the "Controller" or the "Organisation"

What are personal data?

Personal data are practically any information that can identify a living individual directly or that are intended to enable such identification. Personal data can be divided into general (e.g. name and surname, age, telephone number, place of birth, marital status, etc.) and sensitive (today referred to as special categories of personal data, which only include the following personal data – biometric data, membership in a trade union/political party, ethnic origin, philosophical beliefs, genetic data, information about convictions and criminal offences, religious beliefs, political opinions, racial origin, sexual orientation/life, health status).

What does the processing of personal data mean?

The processing of personal data means systematic activities carried out by the Controller with personal data for a specific purpose. The activities according to the previous sentence include: gathering, recording, organising, structuring, storing, adapting and modifying, searching, accessing, using, making available through transmission, dissemination or any other type of access, sorting and combining, restricting, deleting and destroying.

Sources from which personal data are obtained:

- The person concerned
- The producer
- The distributor
- The installation company

Categories of personal data:

Your identification and contact details and data necessary for the performance of the contract.

Legal basis and purpose of processing

The legal basis for processing is:

Your consent to the processing of personal data for the purpose of providing direct marketing under Article 6(1)(a) of the GDPR

For the purpose of concluding and performing a contract (i.e. in accordance with the provision of our services), we process your personal data in accordance with Article 6(1)(b) of the GDPR. The legal basis for processing your general personal data is therefore a contract.

Once the contract has been performed, we must archive your personal data for the duration required by applicable legal regulations. Here, the legal basis for processing your general personal data is the performance of a legal obligation, as determined by Article 6(1)(c) of the GDPR.

The purpose of the processing of personal data is:

The processing of your order and the exercise of rights and obligations arising from the contractual relationship between you and the Controller. When you place an order, personal data necessary for the successful performance of the order/contract, including subsequent payment, service, delivery of services, handling of complaints, etc., are required:

Online monitoring and remote technical support – the processing of data about the device used/diagnostics that can be performed online by the **Controller, manufacturer, distributor or installation company** on selected products. The customer has the opportunity to access the online application.

The use of artificial intelligence (AI) for the processing of diagnostic data, and third-party access to remote control of the customer's device, with his or her consent, via a user application for purposes such as the use of various assistants.

In order to maximise the efficacy of our activities, but also to keep your personal data secure, we cooperate with certain processors and recipients in the following areas:

- providers of information systems and IT services,
- designers,
- providers of marketing and communication services,
- contractual partners, etc.

Sharing your personal data

In accordance with the purpose of processing specified in this policy, personal data are shared among **manufacturers, distributors, and installation and service companies** for the purpose of providing comprehensive customer service.

If we need to **transfer your personal data to countries outside the EU**, we base each transfer on a decision regarding adequate protection and appropriate safeguards to ensure maximum security.

When operating a **profile on social networks** (Facebook), our interest is to increase awareness of the Controller in the online environment and communication with customers.

Personal data that you post on our social media pages such as comments, likes, videos, images, etc., will be published through the social media platform. We do not subsequently process such personal data for any other purpose.

The data subject has the right to object, at any time, to the processing of personal data concerning him or her on grounds relating to his or her particular situation. You can send objections by email to the contact address of the Controller info@mastertherm.cz

Social media managers have their own accepted rules and service infrastructure, and their own provisions for the protection of personal data. We have no influence on the transfer and use of your data by social media managers. We recommend that you familiarise yourself with the privacy policy of the social media platform provider:

Facebook

<https://www.facebook.com/policy.php>;

LinkedIn

<https://www.linkedin.com/legal/privacy-policy>

In certain processing operations, we act with the social media manager as joint controllers in the sense of Article 26(4) of the GDPR.

What personal data will we process and to what extent?

In order to provide you with our services, we need the following personal information: *name and surname, permanent residence address, delivery address for services or goods, phone number and email, ID number for verification, payment information, IP addresses, town/city, diagnostic data for service and technical support, approximate GPS location - the fixed location of the user's device (optional information) for the purpose of weather forecasting,*

How long will we retain the data?

We will retain your personal data for as long as we are performing our mutual contract. After the termination of the contractual relationship, we will retain your personal data for as long as necessary to fulfil the essential archival obligation under legal regulations that presuppose archiving (such regulations include, for example, the Accounting Act, the Value Added Tax Act, and the Archiving and Records Act).

To whom will we transfer your personal data?

Your personal data may be transferred to *providers of legal, tax and accounting services, providers of technical solutions and designers, while we share personal data among the manufacturer, distributor and service company*

Your personal data may also be transferred to *public authorities and courts*, but only if specifically provided for by special legal regulations, or if you give your explicit consent.

Your personal data are always provided to our *processors and subcontractors* based on a processing agreement and in accordance with the minimum required standard of personal data protection under the GDPR.

Conditions for securing personal data

The Controller declares that it has taken appropriate personnel, technical, and organisational measures to ensure the protection of personal data.

The Controller has taken technical measures to secure data storage and the storage of personal data in paper form.

The Controller declares that personal data can only be accessed by persons authorised by the Controller.

There is no automated decision-making or profiling in the personal data processing activities we carry out in the course of our business.

What are your rights in relation to the processing of your personal data by the Controller?

Under the conditions set out in the GDPR, you have:

- the right to access your personal data - Article 15 of the GDPR
- the right to the rectification of personal data - Article 16 of the GDPR
- the right to the restriction of processing - Article 18 of the GDPR
- the right to erasure - Article 17 of the GDPR
- the right to object - Article 21 of the GDPR
- the right to data portability - Article 20 of the GDPR
- the right to withdraw consent - Article 7 of the GDPR (electronically or using the correspondence address)
- the right to lodge a complaint with the Office for Personal Data Protection - Article 77 of the GDPR

How can you exercise your rights?

The right of access

Upon your request, we must tell you whether or not we process your personal data. If we process them, you have the right to have us tell you:

- a) for what purpose we process your data,
- b) the extent to which the data are processed,
- c) how long they will be retained,
- d) to whom they will be made available,
- e) whether you can lodge a complaint with the Office for Personal Data Protection.

You can submit your request electronically, using the email address info@mastertherm.cz or by mail to: Praha 1 - Nové Město, Václavské náměstí 819/43, postcode 11000

The right to rectification

If you believe that we are processing incorrect (inaccurate) personal data, you have the right to have them corrected. If you discover an inaccuracy in your personal data, please let us know and we will correct it without undue delay. You can submit your request electronically, using the email address info@mastertherm.cz or by mail to: Praha 1 - Nové Město, Václavské náměstí 819/43, postcode 11000

The right to erasure

Under certain circumstances, you have the right to have us delete your personal data. You can request us to delete your data at any time. We will delete your personal data if:

- we no longer need your personal data for the purpose for which you provided them to us,
- you withdraw your consent,
- you object to the processing of your personal data,
- we are processing your personal data unlawfully,
- the personal data must be erased in order to comply with a legal obligation,
- you are a child or a parent of a child who has consented to the processing of personal data via the Internet.

The right to restrict processing

You can request us to restrict the processing of your personal data. If we grant your request, we will only retain your personal data and will not process them further. The processing of your data will be restricted if:

- your personal data are incorrect, and until we have verified their accuracy,
- we are processing personal data unlawfully, but you do not agree to their deletion and instead request that we only restrict the processing of your personal data,
- we no longer need your data but you need them to assert, exercise or defend your rights,
- you object to the processing of your personal data, and until we have verified that our legitimate grounds override your reasons.

The right to data portability

You have the right to request that we provide you with your personal data in an electronic form (e.g. an XML or CSV file) that allows you to easily transfer your data to another company. You can also ask us to transfer your personal data directly to a selected company. We will comply with your request if you have provided us with the personal data directly and have given us your consent to process them.

The right to object

You have the right to object to us processing your personal data. If we process your personal data in the following cases:

- because of our legitimate interest,
- for the creation of a customer profile,
- you can object to their processing if you have personal reasons for doing so.

How can you exercise these rights?

You can contact us with your request in any of the following ways:

By email: info@mastertherm.cz or by post to: Praha 1 - Nové Město, Václavské náměstí 819/43, postcode 11000

If you believe that your personal data protection rights have been violated, you have the right to file a complaint with the supervisory authority, which is the Office for Personal Data Protection, at:

Úřad pro ochranu osobních údajů

Pplk. Sochora 27

170 00 Praha 7

Business ID number: 70837627

Telephone: switchboard: +420 234 665 111 (does not provide consultation)

information: +420 234 665 800 (this information line is available on Tuesdays and Thursdays

from 13:00 to 15:30)

WWW: <https://www.uoou.cz>

Email address: posta@uoou.cz

Data box ID: qkbaa2n

This privacy policy becomes effective and valid upon its posting on the website