

PRIVACY POLICY
(“Policy”)

No. EN_POLICY No. 01032025_02
Effective from 1.3.2025

WHEREAS

- (A) **JABLOTRON a.s.**, reg. No.: 286 68 715, registered office Pod Skalkou 4567/33, 466 01 Jablonec nad Nisou, Czech Republic, registered in the Commercial Register administered by the Regional Court in Ústí nad Labem, section B, file No. 1957 (**“Seller”**), is aware of the importance of protection of personal data and privacy of natural persons, including users of the online store;
- (B) The rights and obligation of the Seller and the buyer relating to the purchase of goods in the online store are governed by the Terms and Conditions of JABLOTRON a.s. for the Purchase of Goods in the Online Store for Installation and Business Companies (B2B) (hereinafter also referred as the **“GTC”**) and, where appropriate, by other mutual arrangements between the Seller and the buyer in the online store;
- (C) In collecting, storing and processing buyers’ personal data, the Seller proceeds in accordance with legal regulations of the European Union and the Czech Republic;
- (D) The purpose of this Policy is to fulfil the obligation to inform with respect to data subjects arising from Regulation (EU) of the European Parliament and of the Council No 2016/679 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), as amended (**“GDPR”**);

the following Policy IS PUBLISHED:

I.
TERMS

- 1.1. The terms referred to in this Policy have the same meaning as identical terms defined in the GTC, unless defined otherwise in this Policy.
- 1.2. For the purposes of this Policy, a **subject** is a buyer in the online store, a natural persons acting in their name or a natural person otherwise using the online store.
- 1.3. For the purposes of this Policy, personal data means personal data that are subject of the contractual relationship between the Seller and the buyer resulting from the rights and obligations defined in the GTC (hereinafter also referred to as **“Personal Data”**).
- 1.4. The **Controller** of personal data is a person who determines the purposes and means of processing of Personal Data. In the case of Personal Data processing, the controller is the Seller.

II.
PURPOSE OF THE POLICY

- 2.1. The purpose of this Policy is to comply with the obligation to notify Subjects arising from the GDPR.

III.
PERSON IN CHARGE OF THE PROTECTION OF PERSONAL DATA, AND CONTROLLER’S CONTACT INFORMATION

- 3.1. The Controller has appointed a person in charge of the protection of personal data, who may be contacted using the electronic form available at <https://gdpr.jablotron.cz/>.

- 3.2. If necessary, the Controller can be contacted using the electronic form available at <https://gdpr.jablotron.cz/> or at gdpr@jablotron.cz.

IV.

INFORMATION ABOUT PERSONAL DATA PROCESSING

- 4.1. The Controller processes the following personal data about the Subject directly provided by the Subject:
- 4.1.1. name and surname (or business name),
 - 4.1.2. address (of the place of business / registered office / delivery address),
 - 4.1.3. identification number,
 - 4.1.4. tax identification number:
 - 4.1.5. electronic mail address,
 - 4.1.6. telephone and fax number,
 - 4.1.7. country,
 - 4.1.8. preferred shipping method,
 - 4.1.9. website address.
- 4.2. The Controller processes the following personal data about the Subject not obtained directly from the Subject:
- 4.2.1. Jablotron ID
- 4.3. Personal data will be stored for the duration of existence of the account in online store www.eshop.jablotron.cz, with the exception of Jablotron ID, which may be retained even after that period for other services provided by the Controller.
- 4.4. The Controller processes the personal data above for the following purposes (the legal basis for processing is in the brackets):
- 4.4.1. to fulfil obligations and protect interests arising from contracts entered into (fulfilment of a contractual obligation),
 - 4.4.2. to create, check, operate and manage assigned Jablotron IDs and passwords (fulfilment of a contractual obligation),
 - 4.4.3. to fulfil statutory duties, especially in the area of accounting, taxes, archiving, etc. (fulfilment of a legal obligation),
 - 4.4.4. to improve the quality of online store services (legitimate interest of the Controller),
 - 4.4.5. for marketing purposes (for details see par. 4.5).
- 4.5. Personal data are further used for marketing purposes. The legal basis for such processing is the Controller's legitimate interest in the case of direct marketing because direct marketing is a legitimate interest of the Controller under the GDPR. However, your consent will be required in some cases of marketing; for details refer to Art. VIII.
- 4.6. In some cases, the Controller is entitled to use the services of external companies that process your personal data provided to the Controller. The Controller is entitled, in particular, to enter into a processing agreement with a third party to that end. What personal data are processed by such parties, for what purpose, and identification details of the processors can be found in an annex to this Policy. That annex also lists any other recipients such as other controllers, joint controllers or public authorities.
- 4.7. All persons the Controller engages in the processing of personal data meet the GDPR requirements. In processing your personal data, all employees of the Controller are obliged to keep confidential the personal data they will be processing in the performance of work activities for the Controller.

- 4.8. The Controller may also involve international organisations and processors located in third countries, i.e., outside the European Union or the European Economic Area, in the processing process. The Controller may, however, transfer personal data to third countries only if adequate protection under the GDPR is ensured. Persons to whom personal data are transferred and information about appropriate safeguards and adequate means of additional protection of personal data can be found annexed to this Policy.
- 4.9. Personal data are hosted on servers and data repositories owned or controlled by the Controller and located in the territory of the European Union. Servers and data repositories are maintained and managed with all the necessary expertise corresponding to the character and nature of the online store in accordance with EU and Czech legislation. The Controller has ensured an adequate level of security of servers and data repositories. Personal data may be transmitted within these countries among individual technological and computing devices (including servers and data repositories) controlled or owned by the Controller.
- 4.10. The Controller is further entitled to anonymise personal data for statistical and analytical purposes. That no longer constitutes personal data processing.
- 4.11. The Controller has adopted and applies measures of technical and organization security of personal data protection, which are fully in accordance with ISO27001.

V. SUBJECTS' RIGHTS

- 5.1. As a Subject, you are entitled exercise the following rights against the Controller to the extent and under the conditions set out in Chapter III of the GDPR.
- 5.2. Your rights are as follows:
 - 5.2.1. Subject's right to access to personal data: You have the right to obtain confirmation from the Controller whether the Controller processes personal data concerning you. If processing of your personal data takes place, you have the right to access to such data. Such an access will include, e.g., information about the purposes of processing, categories of personal data, and information about the source of personal data. You also have the right to request a copy of your personal data being processed.
 - 5.2.2. Right to rectification: You have the right to obtain from the Controller without undue delay the rectification of any inaccurate personal data concerning you the Controller processes about you.
 - 5.2.3. Right to erasure: If any of the reasons set out by the GDPR (e.g., personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, or you withdraw your consent) arises, you have the right to obtain from the Controller the erasure of personal data concerning you. This right does not, however, apply without limitation. Data will not be erased, for example, where they are processed based on a legal obligation.
 - 5.2.4. Right to restriction of processing: You have the right to obtain from the Controller restriction of processing in cases defined by the GDPR. That includes, e.g., situations where you contest the accuracy of personal data, and the restriction will apply to the period enabling the Controller to verify the accuracy of the personal data.
 - 5.2.5. Right to data portability: In some cases defined by the GDPR (e.g., where processing is based on your consent), you have the right to receive your personal data from the Controller in a structured, commonly used and machine-readable format, and the right to transmit those data to another controller. You also have the right, where technically feasible, to have the data transmitted directly from the Controller to another controller.
 - 5.2.6. Right to object: You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you where the personal data are

processed based on performance of a task carried out in the public interest or in the exercise of official authority or legitimate interest of the Controller or a third party, including profiling based on those provisions. You have the right to object to the processing for direct marketing purposes.

- 5.2.7. Automated individual decision-making, including profiling: You have the right not to be subject to any decision-making based solely on automated processing, including profiling, which has legal effects on you or significantly affects you in a similar manner. However, this right does not apply in all cases, for example, if the decision is necessary for the conclusion or performance of a contract between you and the Controller.

VI.

RIGHT TO WITHDRAW CONSENT AT ANY TIME

- 6.1. Where the processing of your personal data is based on your consent, you may withdraw that consent at any time. Data processed based on your consent are listed in Art. IV.
- 6.2. Where you provide any personal data and consent to their processing, you do so entirely voluntarily. Withdrawal of consent, but also its granting, is your free choice, and the Controller may not force you to do so or to penalize you in any way. Withdrawal of consent, however, does not affect the legality of processing before the withdrawal (i.e., the withdrawal does not have retroactive effects).
- 6.3. You may withdraw your consent with personal data processing granted to the Controller using the contact details provided in par. 3.2.

VII.

COMPLAINTS

- 7.1. You have the right to lodge a complaint regarding the processing of your personal data to our person in charge of the protection of personal data using the information set out in par. 3.1.
- 7.2. You may also lodge a complaint related to the processing of your personal data to the supervisory authority, which is for the Controller the Czech Office for the Protection of Personal Data (Úřad pro ochranu osobních údajů), Pplk. Sochora 27, 170 00 Praha 7, Czech Republic.

VIII.

SENDING OF EMAILS, SMS, MMS AND COMMERCIAL COMMUNICATIONS

- 8.1. The Controller is entitled to send to the Subject **(i)** emails to the address provided by the Subject; **(ii)** SMS/MMS to telephone numbers provided by the Subject; **(iii)** written mail and marketing materials to the address provided by the Subject, regardless of any acts, events of facts related to the activities of the Controller in respect of the Data Subject.
- 8.2. The Controller is entitled to use the contact details provided in Art. 8.1 also for the purpose of sending commercial communications that are not directly related to the Subject's contractual relationships with the Controller but relate to another product or service of the Controller or the Controller itself. That authorisation, however, only arises where **(i)** you have not refused this; or **(ii)** you have provided consent to receiving commercial communications. You can also refuse receiving commercial communications later, free of charge. This option will be included in each individual message.
- 8.3. If you expressly agree that the Controller may use your email address also to send commercial communications not directly related to the goods or services of the Controller but related to another product or service of the Controller or the Controller itself or another product or service offered by another business in the same group of business the Controller belongs to or related to another business in that group of businesses, commercial communications will be sent to you. However, you

will be entitled to withdraw your consent at any time using the procedure provided in the commercial communication received.

IX.

PROVISION OF PERSONAL DATA BY YOU

- 9.1. Types of processing where provision of personal data is obligatory are listed in Art. IV.
- 9.2. Where the provision of your personal data by you is a legal requirement, you are obliged to provide your personal data. The same situation occurs if it is your obligation to provide personal data on the basis of a contract concluded between you and us. Where the provision of personal data is mandatory and you fail to do so, consequences set out in the applicable legislation or the contract may apply.

X.

COOKIES

- 10.1. Some of your personal data are contained in the cookies used by the Controller in the online store www.eshop.jablotron.cz. You can find details about the use of cookies [here](#).

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