

BLACK CIRCLE

## Privacy Policy



# BLACK CIRCLE

**THIS DOCUMENT: PRIVACY POLICY** is issued by BLACK CIRCLE s.r.o. (hereinafter “Administrator“), ID: 024 99 100, with registered address at Voroněžská 172/24, Vršovice, 101 00 Prague 10, registered in the Commercial Register kept by Municipal Court in Prague, section C, insert 220195 as an administrator of personal data in accordance with Article 12 of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individual with regard to the protection and processing personal data of entities (hereinafter “GDPR”).

## **1. PERSONAL DATA**

1.1. Personal data means any information relating to an identified or identifiable natural person; an identifiable natural person is a natural person who can be identified, directly or indirectly, in particular by reference to a specific identifier, such as name, identification number, location data, network identifier or one or more specific physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

## **2. SCOPE OF PERSONAL DATA PROCESSING**

2.1. Personal data are processed in the extent to which the data have been provided of the Administrator by the concerned entity, in connection with the conclusion of the contractual or other legal relationship with the Administrator, or personal data that the Administrator has collected otherwise, or to meet legal duties, in compliance with applicable laws and regulations.

## **3. SOURCES OF PERSONAL DATA**

3.1. The Administrator obtains personal data directly from entities – data provided in emails, on websites, via contact information, business cards, business documents, legal documents and from other public sources such as publicly accessible registers, records or lists.

## **4. CATEGORIES OF ENTITIES**

4.1. Clients of the Administrator, employees of the Administrator, suppliers of services and goods, entities in a contractual relationship with the Administrator,



employment seekers, website visitors, persons subscribed to marketing messages.

## **5. CATEGORIES OF PERSONAL DATA**

- 5.1. Address and identification data of entities – addresses, names, surnames, titles, dates of birth, registration numbers, registration dates, address, identification numbers and other similar information.
- 5.2. Contact information – address, phone numbers, email addresses, social media handles and other similar information.
- 5.3. Other data necessary for the fulfilment of contractual obligations and data provided by entities themselves, such as bank account numbers and other similar data.

## **6. CATEGORIES OF DATA RECIPIENTS**

- 6.1. The categories of data recipients with whom the Administrator shares data are financial institutions, public institutes, processors, state and other administrative bodies withing the framework of fulfilling legal obligations stipulated by relevant legal regulations.
- 6.2. The Administrator has the right to entrust the processing of personal data a processor who has concluded a processing contract with the Administrator and provides sufficient guarantees for the protection of personal data.
- 6.3. The Administrator intends to transfer personal data to a third country (a non-EU country) or to an international organization. Recipients of personal data in third countries are mailing and cloud services providers.

## **7. PURPOSE OF PERSONAL DATA PROCESSING**

- 7.1. The Administrator processes personal data for the purposes contained in the specific consent of the entities, fulfilment of legal and contractual obligations, business purposes, advertising purposes and marketing purposes.



## **8. PROCESSING METHOD AND PROCESSING TIME**

- 8.1. The processing of personal data is performed by the Administrator. Processing is performed in premises, branches and registered office of the Administrator by individual authorized employees of the Administrator, or a processor in a contractual agreement with the Administrator. The processing takes place in compliance with all security principles for the management and processing of personal data. To ensure this, the Administrator has taken technical, organizational and legal measures to ensure the protection of personal data, in particular measures to prevent unauthorized or accidental access to, alteration, destruction or loss of personal data, unauthorized transfers, unauthorized processing and other misuse of personal data. All entities to whom personal data may be made available respect the right of entities to the protection of privacy rights and are obliged to proceed in accordance with the valid legal regulations concerning the protection of personal data.
- 8.2. The Administrator retains personal data for the time strictly necessary to ensure the rights and obligations arising from the contractual relationship, or for the period specified by the relevant legislation.
- 8.3. The administrator performs an automatic individual decision-making within the meaning of Article 22 of the GDPR.

## **9. COOKIES**

- 9.1. Cookies are short text files that a visited website sends to the visitor's browser. Cookies allows the site to record information regarding website visits and visitors. Cookies are used on the websites the Administrator operates.
- 9.2. The administrator of the website uses session cookies and long-terms cookies.
- 9.3. In accordance with the provisions of Section 89 of Act No. 127/2005 Coll., On Electronic Communications, the Administrator uses cookies for is activities.
- 9.4. The Administrator uses cookies to personalize content and advertisements, provide social media functions and analyse website traffic.

## **10. RIGHTS**

- 10.1. Under the conditions set out in the GDPR, you have:
- the right of access to your personal data pursuant to Article 15 of the GDPR,
  - the right to correct personal data pursuant to Article 16 of the GDPR, or
  - restrictions on processing pursuant to Article 18 of the GDPR ,
  - the right to delete personal data pursuant to Article 17 of the GDPR ,
  - the right to object to the processing pursuant to Article 21 of GDPR,
  - the right to data portability according to Article 20 of the GDPR ,
  - the right to withdraw consent to processing in writing or electronically
- 10.2. You also have the right to file a complaint with the Office for Personal Data Protection if you believe that your right to personal data protection has been violated.

## **11. PERSONAL DATA SECURITY**

- 11.1. The Administrator declares that it has taken all appropriate technical and organizational measures to secure personal data.
- 11.2. The Administrator has taken technical measures to secure data repositories and repositories of personal data in paper form.
- 11.3. The Administrator declares that only persons authorized by him have access to personal data.

## **12. NOTICE**

- 12.1. The Administrator processes the data with the consent of the protected entity, except in cases stipulated by law where the processing of personal data does not require the consent of the entity, i.e. when there is another legal basis for the purpose of processing. In accordance with Article 6 (1) of the GDPR, the Administrator may process the following data without the consent of the data subject:
- processing is necessary for the performance of a contract to which entity is a party or for the implementation of measures taken before the conclusion of the contract at the request of the entity,

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processing is necessary to fulfil the legal obligation applicable to the Administrator,

processing is necessary to protect the vital interests of the protected entity or of another natural person,

processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority entrusted to the Administrator,

processing is necessary for the purposes of the legitimate interests of the Administrator concerned or of a third party, except where those interests take precedence over the interests or fundamental rights and freedoms of the protected entity requiring the protection of personal data.

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BLACK CIRCLE s.r.o.

