

PRINCIPLES OF PERSONAL DATA PROCESSING



PRINCIPLES OF PERSONAL DATA PROCESSING BY TRANSFORM AS LÁZNĚ BOHDANEČ BASED IN LÁZNĚ BOHDANEČ, NA LUŽCI 659, DISTRICT OF PARDUBICE, POSTCODE 533 41, IDENTIFICATION NUMBER: 150 50 114

Company registered in the Commercial Register maintained by the Regional Court in Hradec Králové,
Section B, Insert No. 191 for the sale of goods through e-shop located at <http://www.transform.eu/shop/>

This document informs you how our company handles personal information that you have given us or which we have acquired in connection with our activities. Your rights in relation to us in the processing of personal data are regulated by the Regulation (EU) No 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, repealing the Directive 95/46 / EC (**General Regulation on the protection of personal data**). The following text is aimed at informing you about your most important rights and the way of data processing.

I. BASIC CONTROLLER'S DATA

Company identification data:

Company: **TRANSFORM a.s. Lázně Bohdaneč, ID: 150 50 114**

Registered office: Na Lužci 659, 533 41 Lázně Bohdaneč

Email: office@transform.eu

Website: <https://www.transform.eu/shop/>

(Hereinafter to be referred to as the **"Company"**)

II. PERSONAL DATA PROTECTION OFFICER

The Data Protection Officer has not been appointed.

III. PURPOSE OF PERSONAL DATA PROCESSING

The company enables its customers and business partners to make an order for goods offered through our e- shop, which is available on <https://www.transform.eu/shop/> (hereinafter also referred to as the **"website"**). We process your personal data primarily in order to be able to accept and execute orders made through the website. You can make an order with us both without

registration and with registering while creating a user account at the same time. We are entitled to such processing of personal data as this is necessary to fulfil the agreement you have entered into or you wish to close with us.

All data specified in the on-line forms on the website are always classified into mandatory and non-mandatory. In terms of non-mandatory data, it is up to you to consider whether you fill them or not. In the affirmative, you agree to the processing of these optional data. The processing of non-mandatory data serves us to improve the services provided.

Personal data entered during registration and creation of a user account are collected and processed exclusively for the purpose of making accessible, managing and maintaining your user account. We are authorized to do so on the basis of a contractual obligation to establish your user account in electronic form. The establishment of a user account is free of charge and you have the right to cancel your account at any time, without giving any reason, by e-mail to office@transform.eu, by writing to: Na Lužci 659, 533 41 Lázně Bohdaneč or by any other demonstrable communication addressed to the company.

Upon your consent, we process the personal data obtained through cookies, which are derived from your Internet browser settings after you have been notified on using cookies and have had the opportunity to become acquainted with these principles. Not all cookies collect personal information; some of them only allow the website to function properly. You can reject the use of cookies by the option in the respective settings in your internet browser. We use personal data obtained through cookies for the purposes of maintaining internal records, providing user support, differentiating individual users, improving our products and services, sales support, and more. You can find more information about the way and scope of processed cookies [here](#).

In addition, we may process your personal information in case that we have a legitimate interest in their processing. Such personal data in the scope necessary are processed for documentation purposes of performance provided, defending and enforcing our rights, processing and settling your comments, queries, and requests made through contact forms on the website and for sending marketing communications. The personal data are also processed to fulfil obligations towards public authorities and in accordance with the law.

Your personal data are also processed for the purpose of sending marketing communications informing you about the current offer of our products and services. If you do not wish to receive these information, you can easily disable their acceptance at any time by clicking on the link that can be found in any email message or by any other verifiable communication addressed to the company, such as sending an email to: office@transform.eu, or by letter addressed to: Na Lužci 659, 533 41 Lázně Bohdaneč or any other provable messages addressed companies. We are entitled to such processing for the purposes of our legitimate interests (marketing and sales promotion of products and services). We also process your personal data in order to meet obligations imposed by the law. We are authorized for such processing if it is necessary to meet any obligations related to us.

IV. SCOPE OF PROCESSED PERSONAL DATA

We only process the data that are necessary for the purposes of personal data processing using solely the data you have deliberately and voluntarily passed on as well as the data generated by our activities. We require providing only the data that are necessary for the making and execution of the order and for fulfilment contractual obligation, possibly for the creation and administration of the user account.

Personal data will not be the subject of decision-making exclusively based on the automated processing that would have legal effects for customers or a significant impact on them.

V. TRANSMISSION OF PERSONAL DATA

We do not pass on personal information to other entities without the knowledge of the persons concerned. At the same time, we do not transfer personal data to third countries.

VI. PROCESSING TIME

Personal data are stored with us for as long as we need it to the purpose for which they have been obtained. With regard to legal obligations and the limitation period, personal data will be processed as a rule for a period of 10 years after the termination of the contractual relationship. In some cases, we can decide to keep the data stored even after the lapse of this period, if there are special reasons for doing so.

VII. PERSONAL DATA OF PERSONS UNDER 16 YEARS OF AGE

Our e-shop is not intended for children under 16 years of age. A person under 16 years of age may use our e-shop if a consent to that is granted by his or her legal guardian (parent or guardian).

VIII. RIGHTS OF DATA SUBJECTS

In relation to the processing of personal data, you have a wide range of rights that can be applied under the conditions governed by the following provisions of the General Data Protection Regulations (GDPR):

- a) Right of access by the data subject: in case of processing your personal data, we shall inform you accordingly including the ways of their processing;
- b) Right to rectification: if you find out that your data provided to us are inaccurate, you can ask us to rectify them at any time and we will do that;
- c) Right to erasure: on your request, we shall erase your personal data that we have if these are no longer needed; if you have recalled your consent or raised objection to their processing; if personal data have been processed unlawfully; if the erasure is imposed by law or by other law or if they have been collected in connection with the offer of information society services intended for a child. We can deny the erasure only for the reasons given in the GDPR;
- d) Right to restriction of processing: in case that you oppose the erasure of your personal data and request the restriction of their use instead, your data will remain stored with us, however, we shall not use them or otherwise dispose of them in any way;
- e) Right to data portability to another Controller: - if your data have been provided to us in a structured, commonly used and machine-readable format, we will transmit them upon your request to another Controller;
- f) Right to object: you will have the right to object, if you think that our legitimate grounds for the processing of your personal do not override your right to confidentiality of the data processed. In that case, we shall thoroughly reassess the extent of our legitimate interest taking into account your objection and will inform you about its results. Until then, your personal data will no longer be processed;
- g) Right to file a complaint with the Office for Personal Data Protection: If you believe that we are violating your rights, you may file a complaint at the Office for Personal Data Protection, nevertheless we would appreciate it very much if you to resolve first with us any shortcomings identified. Please feel free to contact us anytime via e-mail: office@transform.eu or info line 800 139 416.

IX. ACCESS TO PERSONAL DATA AND THEIR SAFEGUARDING

We strictly take care that the personal data processed are accessible only to those of our employees who process them to the purpose, for which they have been collected. Personal data are safeguarded against an unauthorized manipulation and alteration.

In some cases, we use services of the personal data processors for processing your personal data. These processors deal with your personal information as per our instructions and are bound to compliance with the applicable data protection rules. These include, in particular, entities providing us server, web, cloud or other IT services and other entities as needed.

Your personal data will be transmitted to third parties only if necessary. We pass on your personal data filled in the order to the carrier to be able to deliver the goods ordered to your address. These transmitted data include, in particular, your name and surname, delivery address, e-mail address and phone number as well as the invoice amount to be paid upon receipt of the goods, unless it have been paid in advance.

Credit cards: our company does not have credit card details and is not equipped with a payment terminal.

Marketing communications: In the case of sending business communications (e.g. by e-mail), we can use the third party to distribute. All processors and third parties will have access to your personal data solely to the extent and for such a period of time, which is necessary to provide products and services, performance of contract and legal obligations or the exercise of our legitimate interests in compliance with the law.

Upon request of court or administrative authorities, the company provides personal data only in cases permitted by applicable law. We never provide, sell or exchange your data with third parties for trading purposes. If you are a legal person, you are obliged to inform your representatives, contact persons and employees with these principles. If you provide us with personal data of third parties, you are obliged to get them acquainted with these principles.

These principles are valid and effective from May 25, 2018.