

# Privacy Policy

## I.

### Basic Provisions

1. Controller of personal data pursuant to Article 4(7) of the Regulation of the European Parliament and of the Council (EU) 2016/679 on the protection of individuals in connection with the processing of personal data and on the free movement of these data (hereinafter referred to as "GDPR") is Kreema s.r.o., Identification No. 10944117, with registered office in Nademlejská 600/1, Hloubětín, 198 00 Praha 9, registered in the Commercial Register kept by Municipal Court in Prague, Section C, insert 351096 (hereinafter referred to as "Administrator").
2. The contact details of the Administrator are:  
address: Moskevská 1, 101 00 Praha 10-Vršovice  
e-mail: hello@kreema.cz  
phone: +420 774 506 301
3. Personal data means any information about an identified or identifiable individual; an identifiable individual is an individual who can be directly or indirectly identified, in particular by reference to a specific identifier, such as a name, identification number, location data, network identifier or one or more specific physical, physiological, genetic, psychological, economic, cultural or social identity of that individual.

## II.

### Sources and categories of processed personal data

1. The Administrator processes the personal data you have provided to him/her or the personal data provided by the Administrator obtained on the basis of fulfilling your order:
  - first and last name
  - email address
  - postal address
  - phone number
2. The Administrator processes your identification and contact data and the data necessary for the performance of the contract.

### III.

#### Legal reason and purpose of processing personal data

1. The legal ground for the processing of personal data is:
  - performance of the contract between you and the Administrator pursuant to Article 6, paragraph 1, letter b) GDPR
  - fulfillment of the legal obligation of the Administrator pursuant to Article 6, paragraph 1, letter c) GDPR
  - legitimate interest of the Administrator in the provision of direct marketing (especially for sending commercial communications and newsletters) pursuant to Article 6 (1) (a) f) GDPR,
  - your consent to processing for the purpose of providing direct marketing (especially for sending commercial communications and newsletters) pursuant to Article 6 (1) (a) (a) Related
  - to GDPR with § 7 paragraph 2 of Act No. 480/2004 Coll., on certain information society services in the event that no goods or services have been ordered.
  
2. The purpose of processing personal data is:
  - processing of your order and exercise of rights and obligations arising from the contractual relationship between you and the Administrator; when ordering, personal data are required, which are necessary for the successful execution of the order (name and address, contact), the provision of personal data is a necessary requirement for the conclusion and performance of the contract, without the provision of personal data, it is not possible to conclude the contract or fulfill it by the Administrator,
  - compliance with legal obligations towards the State,
  - sending business communications and doing other marketing activities.
  
3. There is no automatic individual decision-making on the part of the Administrator within the meaning of Article 22 GDPR. You have given your express consent to such processing

## **IV.**

### **Data retention period**

1. The Administrator stores personal data
  - for the period necessary to exercise the rights and obligations arising from the contractual relationship between you and the Administrator and the assertion of claims under these contractual relationships (for a period of 15 years from termination of the contractual relationship).
  - until consent to the processing of personal data for marketing purposes is withdrawn, 15 years at the most if the personal data are processed on the basis of consent.
2. After the period of storage of personal data has expired, the Administrator will delete the personal data.

## **V.**

### **Recipients of personal data (subcontractors of the Administrator)**

1. The recipients of personal data are these individuals
  - involved in the supply of goods/services/payment realization under contract,
  - providing e-shop services and other services in connection with the operation of the e-shop,
  - providing marketing services.
2. Administrator does not intend to transfer personal data to a third country (non-EU country) or international organization.

## **VI.**

### **Personal data processors**

1. The processing of personal data is carried out by the Administrator, but personal data may be also processed by the following:
  - Mailchimp, Send in Blue service provider
  - where applicable, another provider of processing software of services and applications, but which, however, is currently not used by the Administrator.

## **VI.**

### **Your rights**

1. Under the conditions set out in the GDPR, you have
  - the right of access to your personal data pursuant to Art. 15 GDPR,
  - the right to rectification of personal data pursuant to Art. 16 GDPR or restriction of processing pursuant to Art. 18 GDPR,
  - the right to delete personal data pursuant to Art. 17 GDPR,
  - right to object to processing pursuant to Art. 21 GDPR,
  - the right to data portability pursuant to Art. 20 GDPR,
  - the right to withdraw consent to the processing in writing or electronically to the address or e-mail of the Administrator referred to in Article III of this Privacy Policy conditions.
  
2. You also have the right to file a complaint with the Office for Personal Data Protection if you believe that your right to privacy has been violated, or contact the court.

## **VII.**

### **Terms of personal data security**

1. The Administrator declares that it has taken all appropriate technical and organizational measures to secure personal data.
  
2. The Administrator has taken technical measures to secure data and personal data repositories in paper form.
  
3. The Administrator declares that only authorized persons have access to the personal data.

## **VIII.**

### **Final provisions**

1. By submitting an order from the online order form, you confirm that you are familiar with the Privacy Policy and you accepted it in its entirety.

2. You agree to these terms by ticking your consent via the online forms. By ticking your consent, you acknowledge that you are familiar with the Privacy Policy and that you accept it in its entirety.
  
3. Administrator is entitled to change these conditions. If changes occur, new version of the Privacy Policy will be published on its website and at the same time a new version of these conditions will be sent to your email address you provided to the Administrator.

In Prague, Aprilw 5<sup>th</sup> 2021