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## **MARKETING (legitimate interest)**

### **1. Purpose of personal data processing:**

Personal data are being processed for the purpose of sending commercial offers to customers, the purpose of which is (for example) to inform customers about new goods and services of the controller in order to promote their marketability.

### **2. Legality of personal data processing:**

Personal data are processed pursuant to point (f) of Article 6 (1) of regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of 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).

### **3. Legal obligation of personal data processing:**

Act No. 452/2021 Coll. on electronic communications.

### **4. List of personal data:**

Personal data are being processed in the following extent:

- Name and surname,
- Email address,
- date of newsletter subscription and category (client, non-client, etc.).

### **5. Data subjects:**

The data subjects are customers of the controller.

### **6. The period for which the personal data will be stored:**

The controller processes personal data until the data subject raises an objection to sending commercial offers or for the maximum period of 5 years since the last business activity with the data subject.

### **7. Legitimate interests of the controller:**

Legitimate interest of the controller is processing of personal data of customers (in the necessary extent) for the purpose of sending commercial offers to customers, the purpose of which is (for example) to inform customers about new goods and services of the controller in order to promote their marketability.

### **8. Transfer of personal data of data subjects to third countries:**

Personal data are not being transferred to a third country.

### **9. Technical and organizational security measures:**

Organizational and technical measures for the protection of personal data are processed in the internal regulations of the controller. Security measures are implemented in the areas of physical and object security, information security, cipher information protection, personal,

administrative security and sensitive information protection, with precisely defined competences and responsibilities set out in the security policy.

**10. Categories of personal data:**

General category of personal data.

**11. Disclosure of personal data:**

Personal data are not being disclosed.

**12. Automated individual decision-making, including profiling:**

Automated individual decision-making, including profiling is not being carried out.

**13. Processor:**

<b>Marketing platform for email communication</b>	pursuant to Article 28 of regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of 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).
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**14. Other authorised bodies:**

Other authorised body	Legal basis	The scope of personal data provided:
<b>Public authorities</b>	However, public authorities which may receive personal data in the context of a specific survey in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be carried out in accordance with the applicable data protection rules, depending on the purposes of the processing;	Personal data to the extent requested by an authorised body (e.g., police in the context of an investigation of offences or criminal offences)

**15. Rights of data subjects:**

The data subject has the right to request from the controller access to the personal data processed about him/her, the right to rectification of personal data, the right to erasure or restriction of processing of personal data, **the right to object to the processing of personal data**, the right to portability of personal data, as well as the right to lodge a complaint/complaint with a supervisory authority. Where the controller processes personal data on the basis of the data subject's consent, the data subject shall have the right to withdraw his or her consent to the processing of personal data at any time. The withdrawal of consent shall not affect the lawfulness of the processing of personal data based on consent prior to its withdrawal. The data subject may submit their comments and requests

concerning the processing of personal data to the controller in writing or by electronic means.