

Principles Of Personal Data Protection

By completing your online registration, signing up for business communications or by browsing the ThinkPrague website, you make it possible for the ThinkPrague s.r.o. company, with the registered office at Plaská 617/4, 150 00 Prague 5 – Malá Strana (hereinafter referred to only as “**ThinkPrague**”) as the data controller, in accordance with Act No. 101/2000 Coll., on Protection of Personal Data and on the Amendment of Some Acts, as amended,

and, as from 25 May 2018, in accordance with the General Data Protection Regulation No. 2016/679 (GDPR) (hereinafter referred to only as the “**GDPR**”) to process and use your personal data. These principles are intended to inform you, in accordance with the GDPR, about what information we collect about you, for what reason and how we use your information, what your rights are regarding the personal data we use and in what manner you can enforce these rights in accordance with the GDPR.

Information Collected

On the files of customers receiving services provided by ThinkPrague, your personal data are processed in particular in the following scope: your name, surname, e-mail, telephone, nationality, or any other personal data related to the proper provision of ThinkPrague services or personal data that ThinkPrague will acquire about you or are provided at any time by yourself or are required by law for us in order to process your registration and for you to subsequently use our services, i.e. to fulfil the purpose of providing, in particular, guiding services for the purposes of proper execution of the ThinkPrague programme or the provision of related information and instructions and for the records of ThinkPrague customers, namely throughout the period required for the realization of these purposes. After the obligations arising from the agreement are fulfilled, ThinkPrague uses personal data from order records for other purposes. It is in ThinkPrague's *legitimate interest* to keep the entire order records for reasons of legal protection against future disputes. Due to the limitation period and the functioning of the judicial system, ThinkPrague has to process your data from the order records for the period of 6 years. Data from the order records are also used by ThinkPrague to fulfil its legal obligation to archive the documentation due to a possible financial control, namely for a period of 10 years.

In its user records, ThinkPrague, processes your personal data to the extent that you provide these data when registering or editing your profile, when creating an order, or linking your account to social networks. It is in ThinkPrague's *legitimate interest* to maintain a database of users; in addition, the database will allow individual customers to maintain and manage their profiles as part of their registration on our website. In addition to registration purposes, this database is used by ThinkPrague to identify people when dealing with ThinkPrague, settling complaints or orders or for marketing purposes (see below). We also use the data to be processed for marketing purposes. We describe these personal data in detail below. We keep the personal data for reasons of user registration for 5 years of your last realized order.

Marketing Purposes

ThinkPrague processes, for marketing purposes, your contact information that you fill in when ordering, registering, or signing up for business communications and that ThinkPrague uses to send business communications and to make the communications sent more relevant. ThinkPrague strives to keep you entertained and inspired by the information, therefore, it is important for us to know your reactions to these communications which is why ThinkPrague keeps your feedback. You can unsubscribe to business communications at any time, of course. ThinkPrague will no longer use your personal contact details to send you business communications after you have completely logged out (from all information channels).

All personal data used for marketing purposes are used by ThinkPrague by virtue of a legal and legitimate interest and kept for marketing purposes for the period of 5 years of your last order.

Handover Of Data

Your personal data are used solely for ThinkPrague's internal needs, solely for the reasons stated above. However, ThinkPrague does not only provide the required services regarding the personal data by its own means, it also uses third party services (provided by specialised companies). ThinkPrague has concluded agreements with the third parties to whom ThinkPrague provides your personal data under which ThinkPrague is able to secure and protect your rights in the area of personal data protection.

ThinkPrague processes your personal data in the information, analytical and other systems of third parties that ThinkPrague essentially needs for doing its business, such as:

Accounting software – the iDoklad software application operated by Solitea Česká republika, a. s., Company ID No.: 255 68 736

Data Storage

Data are stored on ThinkPrague's backed-up servers in the data centre of the following company: THINline s.r.o., Company ID No.: 267 47 359, with its registered office at: Nádražní 42/82, 150 00 Prague 5. The data centre's security is fully compliant with the GDPR.

Access to the systems mediating personal data of ThinkPrague's customers is only allowed to a limited number of internal users for whom such access is necessary in line with their job description. These include, for example, employees working in the department for settling orders, the registration department, etc. Individual workers always have access to only such amount of personal data they need for their work. Access to all critical systems processing personal data of ThinkPrague's customers is limited only within the internal network and the above persons will automatically lose access to your personal data when terminating their legal relationship with ThinkPrague.

GDPR, Your Rights And Their Use

Right To Access Data And Right To Update Them

Whenever you want in the future, you can request that ThinkPrague sends you a confirmation of whether ThinkPrague processes your personal data or not by sending a message to our e-mail address: personaldata@thinkprague.com. In the event that your data is processed by ThinkPrague, ThinkPrague may, at your request, inform you, in addition to the information provided in the General Terms and Conditions and in these Principles Of Personal Data Protection, about any third parties whom your personal data has been or will be made available to. If ThinkPrague does not obtain personal data from you, you are entitled to any available information about where ThinkPrague obtained your personal data from.

If ThinkPrague processes your personal data imprecisely, you may notify ThinkPrague of this fact by sending a message to the following e-mail address: personaldata@thinkprague.com. ThinkPrague will then correct the inaccurate personal data without undue delay. If you would like to add any personal data for ThinkPrague that you have not previously provided, and these personal data are necessary to ensure the provision of our services, simply send them to our e-mail address. By the means of a written request addressed to ThinkPrague's management, you may request that your personal data that are not necessary for further processing are removed.

Right To Raise an Objection To the Processing Of Personal Data

Even if ThinkPrague processes your personal data on the basis of ThinkPrague's legitimate interest, you have the right to object to such processing. You can do this by sending a message to the following e-mail address: personaldata@thinkprague.com. If you make such an objection, ThinkPrague will, without undue delay, evaluate to what extent we may, in compliance with the law, claim the legitimacy of the reasons for processing your personal data, despite the objections raised by you, and how ThinkPrague will handle your personal data in the meantime. As long as ThinkPrague fails to prove to you that our reasons are legitimate, ThinkPrague will not be processing your personal data anymore.

Right To Limit Personal Data Processing

You have the right to require that ThinkPrague limits any processing of your personal data, including their deletion, i.e. that ThinkPrague ceases to deal with them:

- If you let ThinkPrague know that the personal data collected by it are inaccurate, until their correctness is checked.
- If the processing of your personal data is unlawful and you, instead of deleting them, request, by sending a message to the following e-mail address: personaldata@thinkprague.com, that their use is restricted.
- If ThinkPrague no longer needs your personal data to provide its services but you will need them to exercise your rights.
- If you raise an objection to the processing as per the above paragraph, namely until ThinkPrague checks whether its reasons for the processing prevail over your interests.

Right To Delete Personal Data

If you find that ThinkPrague processes personal data:

- although their processing is no longer necessary for the purposes for which we obtained them,
- if you raise an objection under the above paragraph and ThinkPrague is not able to demonstrate to you legitimate reasons for the processing thereof that prevail over your interests, your rights and freedoms or over the performance or defence of legal claims and/or
- in an unjustified manner,

you have the right to require that ThinkPrague deletes personal data processed in such a manner without any unnecessary delay after your notification of such facts by sending a message to the following e-mail address personaldata@thinkprague.com. However, the data may not be erased even at your request if the processing thereof is necessary for the exercise of the right to freedom of expression and information, to comply with some of ThinkPrague's legal obligations or to perform a task carried out in the public interest or to identify, exercise or defend ThinkPrague's legal rights.

Right To Provide Data In Machine-Readable Format

If you request, by sending a message to the following e-mail address: personaldata@thinkprague.com, that ThinkPrague provides you with your processed personal data, ThinkPrague will send them to you in a structured, commonly used and machine-readable format (e.g. *.xls, *.csv or a similar format). If you request ThinkPrague to send your personal data to another personal data controller, ThinkPrague will, of course, grant your request.

Right To Unsubscribe At Any Time To Business Communications

If you no longer wish to receive business communications from ThinkPrague, you can prevent their being sent either by clicking on the link that is part of each business communication or by modifying the subscription in your profile created based on your registration on our website.

Right To Revoke At Any Time Your Consent To Receiving Business Communications

If ThinkPrague wants your consent to the processing of personal data as part of special events, you may withdraw this consent at any time, without giving any reason. You can withdraw your consent either in the manner specified in detail in the rules on competition or, always, by sending the withdrawal of your consent to the following e-mail address: personaldata@thinkprague.com.

Right To Lodge a Complaint With the Office For Personal Data Protection

If, in your opinion, ThinkPrague does not fulfil all of its legal obligations arising in conjunction with the processing of your personal data, please contact ThinkPrague's management. If this does not help, you have, of course, the right to contact the Office for Personal Data Protection, either at the address of the Office: Pplk. Sochora 27, Prague 7, Postal Code 170 00, e-mail: posta@uouu.cz or in any other way accepted by the Office for Personal Data Protection. For more information on the Office, please visit www.uouu.cz.