

# Privacy Policy

## I. Basic provisions

1. The controller of personal data pursuant to Article 4(7) of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as: "GDPR") is Nelemi Co sro, ID number 29223199, with its registered office at Kněžice 3, Kněžice, 675 29, Třebíč, Czech Republic (hereinafter referred to as: "controller").

2. The contact details of the administrator are:

- **Address** : Nelemi Co sro, Kněžice 3, 675 29, Třebíč
- **Email** : info@conceptmango.cz
- **Phone** : 724 119 336

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

4. The administrator has not appointed a data protection officer.

5. **Personal data stored** :

- First and last name
- Address (delivery, billing)
- E-mail
- Telephone number
- ID / VAT number (only for corporate customers)

The personal data stored above is necessary to fulfill the contract or other obligations. We do not store any unnecessary personal data.

## II. Sources and categories of processed personal data

1. The administrator processes personal data that you have provided to him/her or personal data that the administrator has obtained based on the fulfillment of your order.

2. The administrator processes your identification and contact data and data necessary for the performance of the contract.

### III. Purposes of processing personal data

The administrator processes personal data for the following purposes:

**a) Fulfillment of the contract or other obligation and provision of services :**

- Personal data will be processed during the negotiations on the conclusion of the contract between the administrator and the participant, for the purpose of concluding the contract, as well as for the duration of the contractual relationship.
- Marketing campaigns** : for the purposes of fulfilling the marketing campaign, evaluation, termination, delivery of any winnings, etc. Processing time: for the duration of the marketing campaign.

**b) Fulfillment of legal obligations** (especially accounting, tax and archiving obligations, providing cooperation to administrative authorities, police, courts):

- The tax document will be kept for 10 years from the termination of the contract. In order to fulfill the legal obligation to archive accounting documents based on Act No. 563/1991 Coll., on Accounting, as amended, personal data will be further processed and stored for a period of 10 years starting from the year following the year in which the contract was concluded between the administrator and the participant.
- Fulfillment of obligations in connection with the exercise of rights arising from defective performance, providing cooperation to administrative authorities, the police, and the court: the administrator is authorized to process the customer's basic personal, identification, and contact data, data about the goods, and data from communication between the customer for a period of 4 years from the date of expiration of the warranty period for the goods.

**c) Legitimate interests of the administrator, protection of the rights and legally protected interests of the administrator :**

- Effective defense in the event of a dispute. The processing time is set at 4 years from the expiration of the warranty period for the goods and is extended by the duration of the dispute.
- The legitimate interest of the controller is also the sending of commercial communications (general offers and individual offers) in accordance with Section 7(3) of Act No. 480/2004 Coll., on certain information society services and in accordance with point 47 of the Regulation, if the controller has obtained electronic contact details in connection with the sale of goods and services to the subscriber.

**d) Marketing and commercial offers of the administrator's services :**

- General sending of commercial offers of products and services: sending general advertising messages without targeting a specific group of recipients. The period of processing personal data in this case is 3 years.
- Individual offer: sending advertising messages after assessing certain personal aspects relating to the natural person. The controller does not carry out profiling in accordance with Article 22 of the Regulation, as this is not automated processing, but the manual creation of individual offers.

We measure your satisfaction with your purchase through e-mail questionnaires as part of the Verified by Customers program, in which our e-shop is involved. We send these to you every time you make a purchase from us, unless you refuse to receive them pursuant to Section 7(3) of Act No. 480/2004 Coll., on certain information society services. We process personal data for the purposes of sending questionnaires as part of the Verified by Customers program based on our legitimate interest, which consists of determining your satisfaction with your purchase from us. To send questionnaires, evaluate your feedback, and analyze our market position, we use a processor, which is the operator of the Heureka.cz portal; for these purposes, we may provide it with information about the purchased goods and your e-mail address. When sending e-mail questionnaires, your personal data is not provided to any third party for its own purposes. You can object to receiving email surveys as part of the Verified by Customers program at any time by opting out of further surveys using the link in the survey email. If you object, we will not send you any more surveys.

**Cookies** : Short text files generated by a web server and stored on your computer via a browser. First of all, these cookies are necessary to ensure the functioning and analysis of the website (the transmission of electronic communication via an electronic communications network, the use of these cookies cannot be objected to). The user gives the administrator their consent to the use of cookies by setting their internet browser.

We work with Microsoft Clarity and Microsoft Advertising to capture how you use and interact with our websites using behavioral metrics, heatmaps, and session replay to help us improve and market our products/services. Website usage data is captured using first- and third-party cookies and other tracking technologies to determine product/service popularity and online activity. We also use this information for website optimization, fraud/security purposes, and advertising. For more information about how Microsoft collects and uses your data, please see the Microsoft Privacy Statement.

#### 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 to assert claims from these contractual relationships.

2. After the personal data retention period has expired, the administrator will delete the personal data.

## V. Recipients of personal data (subcontractors of the controller)

1. The recipients of personal data are persons: a) Participating in the delivery of goods/services/payments under the contract:

- To a partner operating payment systems for the purposes of securing payment, especially in connection with card payments GOPAY sro, ID: 26046768;
- To partners providing installment sales and deferred payment, if you choose this type of payment, in particular the companies Homecredit, as, ID: 26978636; Twisto payments as, ID: 01615165;
- To shipping partners, especially PPL sro, ID: 25194798; Česká pošta, sp, ID: 47114983; TOPTRANS EU, as, ID: 2202376; Uloženska, sro, ID: 24299162, if they deliver your order to you.

b) Providing e-shop operation services and other services related to the operation of the e-shop:

- The company operating internet services Nelemi Co, as, Company ID 29223199;

c) Providing marketing services:

- Google Ireland Limited (registration number: 368047), with its registered office at Gordon House, Barrow Street, Dublin 4, Ireland; its privacy policy is available here: <https://policies.google.com/technologies/ads> ;
- Facebook Ireland Limited, with registered office at 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, D02 X525, Ireland; its privacy policy is available here: <https://cs-cz.facebook.com/about/privacy> ;
- Seznam.cz, as, company ID 26168685;
- Bianco sro, 041 46 905, with registered office at Křižíkova 148/34, Karlín, 186 00 Prague 8.

2. The Administrator does not intend to transfer personal data to a third country (a country outside the EU) or an international organization.

## VI. Participant's rights related to processing

1. Participant's rights in relation to the protection of personal data:

- Request access to his/her personal data from the controller;
- Request correction of the personal data provided;
- Request the deletion of the personal data provided;

- Request restriction of processing of personal data;
- File a complaint with the Office for Personal Data Protection;
- The right to transfer personal data to another controller;
- The right to object to the processing of personal data.

2.The participant may exercise his/her rights pursuant to paragraph 1 of this article via the link provided in the footer of the e-mail sent by the administrator or by sending a request to the address [gdpr@conceptmango.cz](mailto:gdpr@conceptmango.cz) .

3.The rights under paragraph 1 of this Article, letters c) and d) cannot be exercised to the extent and for the purposes specified in Article II, paragraph 1, letters a), b) and c), with the exception of point ii) letter c) of Article II, when all rights specified in paragraph

4.If the participant believes that the controller is processing his/her personal data in a manner that is contrary to the protection of his/her private and personal life or in violation of applicable legal regulations, in particular if the personal data are inaccurate with regard to the purpose of their processing, he/she may:

- Ask the administrator for an explanation by e-mail to [gdpr@conceptmango.cz](mailto:gdpr@conceptmango.cz) ;
- Object to the processing and request by e-mail sent

to [gdpr@conceptmango.cz](mailto:gdpr@conceptmango.cz) that the administrator ensure the elimination of the situation thus created (e.g. by blocking, correcting, supplementing or destroying personal data). The administrator shall immediately decide on the objection and inform the participant. If the administrator does not comply with the objection, the participant has the right to contact the Office for Personal Data Protection directly. This provision does not affect the participant's right to contact the Office for Personal Data Protection directly with their complaint.

5.If the participant exercises the right under this article, the administrator is obliged to respond within 30 days of receiving the request.

6.Acceptance of a request to exercise the right from Article IV., point 1 a) and f) is possible only by data message or letter with an officially verified signature to the address of the company's registered office. The request must include an e-mail address, to which a verification e-mail will then be sent in order to confirm the identity of the applicant.

7.If the participant exercises any of the rights under Article IV, paragraph 1, the controller has the right to request proof of the participant's identity. The request for access to personal data must therefore be sent from the applicant's email address. If the request is submitted in a different form or from a different email address, the controller has the right to request additional verification by replying to a verification email. If the applicant fails to prove his identity within 14 days of sending the verification email, his request to exercise the rights under Article IV, paragraph 1 will not be accepted.

8.In the event of a repeated and unjustified request for a physical copy of the processed personal data, the Administrator is entitled to charge a reasonable fee for the administrative costs associated with this.

## VII. Conditions for securing personal data

- 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 repositories and personal data repositories in paper form.
- 3.The administrator declares that only persons authorized by him have access to personal data.

## VIII. Final provisions

- 1.By submitting an order from the online order form, you confirm that you are familiar with the terms and conditions of personal data protection and that you accept them in their entirety.
- 2.You agree to these terms and conditions by checking the consent box via the online form. By checking the consent box, you confirm that you are familiar with the terms and conditions of personal data protection and that you accept them in their entirety.
- 3.The Administrator is entitled to change these terms and conditions. The Administrator will publish the new version of the personal data protection terms and conditions on its website and will also send you a new version of these terms and conditions to the email address you provided to the Administrator.

These terms and conditions come into effect on 30 August 2024.