



prodejní sklad: ☎ +420 566 520 182
obchodní úsek: ☎ +420 566 524 236
prodej pneumatik: ☎ +420 733 700 715
pneuservis: ☎ +420 601 699 607

PRIVACY POLICY

ORGANIZATION:

ATP Motor s.r.o.
Stránecká Zhoř 140
594 42 Měřín
Company ID: 28326695

AUTHOR:

Radek Procházka

APPROVED BY:

Ing. Zdenek Toufar

VALID TILL:

ATP Motor s.r.o., registered seat Stránecká Zhoř 140, 594 42 Měříň, Company ID: 28326695 (hereinafter referred to also as the **"Organization"** or **"We"**), being the personal data administrator, informs you, the personal data subject, about personal data collecting and processing and about the privacy policy as described below.

1. INTRODUCTION

This document will familiarize you with the following:

1. What personal data will be processed;
2. Why and how your personal data will be processed;
3. Who your personal data may be handed over to;
4. For how long your personal data will be processed, and
5. What rights do you have in the field of privacy policy.

If you need any part of the text to be explained, further processing of your personal data advised or discussed, you can contact us in person in the registered seat of the organization or at the e-mail address prochazka@atpmotor.cz.

Processing of personal data of the natural persons/ individuals ("data subjects") within the Organization is performed for the benefit of these persons. However, the right to personal data protection is not an absolute right; it has to be assessed in the context of the individual's function in the society and, in accordance with the principle of proportionality, it must be in balance with all other fundamental rights.

ATP Motor s.r.o processes personal data and other information concerning the data subjects only and exclusively on the legal basis. The majority of personal data is therefore processed on the basis of the obligations imposed on the Organization by special acts. Processing of such personal data concerning the data subjects is not subject to the obligation to obtain consent of these persons. If some personal data are processed outside the legal obligation, such processing is subject to approval of the citizens. However, the Organization processes such data only exceptionally (for example, when organizing social events for the data subjects where a pre-registration is required, or records of such events are made, which records are intended to promote activities of the Organization).

2. WHO PROCESSES YOUR DATA?

Your personal data are processed only and exclusively by Us. Personal data are handed over to another person on the legal basis only, it means, on the basis of a legal obligation or on the basis of a written agreement with an entity providing adequate guarantees of personal data protection.

We do not share personal data with other entities outside of our Organization, unless one of the following occurs:

Upon your approval: If you give us your consent, we will share your personal data with another entity outside of our Organization. In the case of sensitive personal data sharing, your explicit consent is requested.

For purpose of external personal data processing: Our Organization provides personal data – within the necessary and minimum scope – to the trustworthy companies and persons/entities providing services /accounting, legal, administrative, or IT/ to our Organization so that they may process them, based on our instructions and in accordance with our privacy policies and other appropriate confidentiality and security measures.

For legal reasons: We share personal data with companies, organizations or individuals outside of our Organization if we are convinced in all good faith that access to such information, its use, preservation or disclosure is reasonably **necessary to:** comply with applicable acts or regulations, conduct court proceedings, settle enforceable requests of the state administration, apply the relevant contractual conditions including investigation of their possible violation, establish, prevent or otherwise act in case of a fraud, technical difficulties or security issues, protect against violation of rights, property or security of our Organization, our citizens / clients / or the wide public, as required or permitted by law.

3. WHAT KIND OF YOUR PERSONAL DATA ARE PROCESSED?

The Organization processes personal data of the citizens, depending on the purpose of processing and in accordance with the applicable privacy legislation, Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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). However, each individual concerned data subject has the right to raise an objection against processing of the personal data relating to its particular situation. The Organization shall then demonstrate (to the data subject) gravity and legitimacy of the Organization's interests that do not interfere with the interests or fundamental rights and freedoms of a citizen.

We are most frequently speaking about the data that are defined in special legal regulations, or that are necessary for fulfilment of our obligations and/or that will be released by you to us when subscribing to any of our services:

- a) Email;
- b) Name and surname (only if necessary for a particular service);
- c) Contact and/or delivery (mailing) address;
- d) Profile information, such as age, sex;

- e) Date of birth, birth code;
- f) Phone number.

4. PWHY ARE YOU PERSONAL DATA PROCESSED?

The data, provided by you to us, are processed only for the purpose determined in specific legal regulations or necessary for fulfilment of our contractual obligations or that has been approved by you. For this purpose, your personal data are used within the necessary and minimum extent.

All personal data are processed in a lawful and transparent manner, and only adequate, relevant and necessary data are required in relation to the purpose of processing.

Moreover, We may also use your name, surname, and email address or phone number to send/mail you the information about activities and events of the Organization.

You may at any time reject processing of your personal data for purpose of sending the information about activities and events of the Organization to you, which fact will not affect our mutual relationship anyhow. Just send us an e-mail with the appropriate request to prochazka@atpmotor.cz.

5. TIME PERIOD OF PERSONAL DATA PROCESSING

Your data will be processed for the whole term which follows from special legal regulations, or for the time period of utilization of our services (i.e. the term of the contractual relationship between us) and, if applicable, on the basis of the granted approval – for the time period shown in your consent, unless your consent with personal data processing is revoked on your part.

Here, however, we would like to point out that the personal data, which are necessary to render the service properly and/or to fulfil all of our obligations, whether or not these obligations arise from a contract between us or from the generally binding legal regulations, must be processed irrespective of your consent for the time period stipulated by the applicable legal regulations or in conformity with them, even after possible withdrawal of your consent.

6. ON WHAT BASIS YOUR PERSONAL DATA CAN BE PROCESSED?

As already mentioned, we may process your personal information on the basis of your consent, but also on the basis of our legitimate interest (such as acquisition and appropriate use and release of the records from social, cultural and sports events organized by our Organization), or to fulfil the contract executed between us, namely within the extent of the personal data that is necessary for such fulfilment. Last but not least, fulfilment of the obligations following for us from the applicable legal regulation is the very reason enabling us to process your personal data even without your consent.

7. YOUR RIGHTS FOLLOWING FROM PERSONAL DATA PROCESSING

You have the following rights relating to our processing of your personal data:

- a) right to access to the personal data;
- b) right to correction;
- c) right to deletion ("right to be forgotten");
- d) right to restrict data processing;
- e) right to lodge an objection against processing, and
- f) right to file a complaint concerning personal data processing.

All the above rights can be applied for at prochazka@atpmotor.cz or in person in the registered seat of the Organization. You can file a complaint with the Supervisory Authority, which is the Office for Personal Data Protection (www.uoou.cz).

Right to access to the personal data means that you can ask the Organization to confirm whether or not the personal data concerning you are processed and, if so, for what purposes, to what extent, to whom it is made available, for how long we will process them, whether or not you have the right to correct the data, erase/delete, restrict their processing, or file an objection, from where we have obtained the personal data, and whether processing of your personal data results in automatic decision making, incl. possible profiling.

You also have the right to obtain a copy of your personal data, the first copy is granted free of charge, and the administrative costs of CZK 50 per one page of the copy are charged.

Right to correction means you can ask the Organization to correct or supplement your personal data, should they be inaccurate or incomplete.

Right to deletion means that we have to erase your personal data if (i) they are no longer necessary for the purposes for which they were collected or otherwise processed, (ii) data processing is unlawful, (iii) you lodge an objection against data processing, and if there are no overriding legitimate reasons for processing, or (iv) it is imposed by a legal obligation.

Right to restrict data processing means that until we resolve any disputable issues regarding processing of your personal data, we must restrict processing of your personal data, i.e. they may only be stored and possibly used to determine, exercise or defend the legal claims.

Right to lodge an objection means that you can lodge an objection against processing of your personal data, where such processing is necessary for fulfilment of the task performed in the public interest or in exercising the public authority vested to the administrator; or where processing is necessary for the purposes of the legitimate interests of the relevant

administrator or a third party, except the cases, where the interests as above are prevailed by the interests or fundamental rights and freedoms of the data subject requesting personal data protection, in particular where a child is understood under the data subject.

The administrator shall not process the personal data unless he/she can prove serious legitimate reasons for processing that outweigh the interests or rights and freedoms of the data subject, or in order to determine, exercise or defend the legal claims.

When the personal data are processed for direct marketing purposes, the data subject has the right to lodge and objection at any time against processing of personal data relating to him/her for marketing, including profiling provided that it concerns this direct marketing. If a data subject lodges an objection against data processing for direct marketing purposes, personal data will no longer be processed for such purpose.

8. HOW ARE MY PERSONAL DATA SECURED?

All personal data provided by you are protected and secured by the standard procedures and technologies in accordance with the **internal directive of the Organization** to prevent disclosure of these personal data to unauthorized persons. These include, in particular, technological protection of computers, email accounts and mechanical security of physical copies of the documents containing the personal data.

9. HOW CAN YOU CONTACT US?

In case of any inquiry concerning personal data protection or any application concerning your personal data, including withdrawal of your consent with further personal data processing, please use the email address prochazka@atpmotor.cz or write us to our address: ATP Motor s.r.o., Stránecká Zhoř 140, 594 42 Měříň.

At the same time, we notify that Bohuslav Ludvík, domicile Osová 31, Velké Meziříčí, has been appointed the Data Protection Officer of our Organization and can be contacted at the email address: ludvik@prolog.cz.

In this regard, we would like to alert you that we may want you to prove your identity in an appropriate way so that we can verify your identity. This is a precautionary security action to prevent unauthorized persons from accessing your personal data. In order to increase quality of services and keep records about fulfilling our statutory obligations by law, the complete communication with you is monitored.

10. CHANGES IN THE PRIVACY POLICY

Our Privacy Policy may be changed from time to time. Your rights under this Privacy Policy will not be restricted anyhow without your explicit consent. We will post all changes to our Privacy Policy at www.atpmotor.com, and more significant changes we will be notified in a highlighted and pinpointed way. Previous versions of this Privacy Policy will also be kept in the archives where you can read them.