

WHO IS THIS INFORMATION INTENDED FOR?

In the interests of clarity and comprehensibility, the company ProfiSMS s.r.o. has prepared (hereinafter referred to as "ProfiSMS") information on the processing of personal data for individual categories of data subjects separately.

This information is intended for:

- suppliers (natural persons) and employees of suppliers (legal entities) who make deliveries to ProfiSMS s.r.o.;
- employees of customers who on the company's website www.ProfiSMS.cz filled out the contact form for pricing services, filled out the registration form, asked a question in the chat on the website, or used the test option of sending a sample SMS;
- website visitors who, by setting their browser, have provided on the website www.ProfiSMS.cz consent to the storage of cookies on their device.

For greater clarity of the text, the term "client" is used for all the groups mentioned above within this information.

If you belong to another category of data subjects, please visit our website for further Information on the processing of personal data.

How can I submit a request to exercise my rights under the GDPR?

You can contact us:

In writing	ProfiSMS s.r.o. Thámová 166/18 186 00 Prague 8
By email	dpo@profisms.cz

COMMISSIONER FOR THE PROTECTION OF PERSONAL DATA

ProfiSMS has appointed a personal data protection officer:

Mgr. Bohdan Šulak

address: Thámová 166/18, 186 00 Prague 8 - Karlín

e-mail: dpo@profisms.cz

You can contact the personal data protection officer in particular if you have any questions, comments, or suggestions related to the processing and personal data protection policy of ProfiSMS s.r.o. or if you are not satisfied with the course of exercising your right.

WHICH PERSONAL DATA ABOUT ME DOES PROFISMS PROCESS?

Client data related to an inquiry or contract

Identification data - name, surname, titles, employer's company

Contact information – phone number, e-mail address

Data on the subject of your request – expected number of SMS per month, subject of the message for the company

Client data related to visiting the website

Identification data – IP address, MAC address.

Client Preference Data – movement on the website (area, time), preferences of viewed products.

Data of clients - suppliers

Identification data - name, surname, titles, registered office, ID number, VAT number

Contact information – phone number, e-mail address

Reports of work – performed activity, timesheets

WHY PROFISMS PROCESSES MY PERSONAL DATA

Which legal bases does ProfiSMS use for processing personal data?

ProfiSMS can process your personal data only for the purposes it has the relevant legal basis for processing. Due to the subject matter of ProfiSMS, the legal basis for the processing of personal data comes into consideration:

- if it is necessary for the fulfillment of the contract concluded with you or for the implementation of measures before the conclusion of this contract at your request
- if necessary to fulfill our legal obligation
- if it is necessary for the purposes of our legitimate interests (“**legitimate interest**“)
- based on your consent

Therefore, your consent is required for the processing of personal data only if ProfiSMS has no other legal basis for the given purpose of processing. The purposes for which ProfiSMS processes personal data can be divided into the following main areas: fulfillment of the contract, offering products based on demand before the conclusion of the contract, marketing, and retention of information if necessary to fulfill ProfiSMS's legal obligations.

Determining the legal basis according to which we process your personal data for a given purpose is important for you because it depends on the scope of rights that you can exercise against us in connection with the processing of personal data.

Do I have to provide my personal data to ProfiSMS?

The provision of personal data is always voluntary. However, if you refuse to provide us with your personal data for processing purposes that have a different legal basis for processing than your consent, it will not be possible for you to become our client, because the provision of your personal data for these purposes is a prerequisite for concluding a contract.

In the case of consent to the processing of personal data, the provision of personal data for the purposes defined in the given consent is always entirely at your discretion. You can withdraw your consent at any time free of charge. However, revocation of consent does not affect the legality of processing based on consent before its revocation.

How does ProfiSMS access my personal data?

ProfiSMS processes personal data that:

- you communicated it yourself / ProfiSMS communicated it yourself;
- ProfiSMS was informed by your employer in connection with the contract concluded between him and ProfiSMS;
- arise as part of your activity on the website www.ProfiSMS.cz;

FOR WHAT PURPOSES DOES PROFISMS PROCESS MY PERSONAL DATA?

Purpose of processing: Registration of demand, preparation of offers and contracts at your request

Detailed description: You filled out a request for our services on our website. We will process the information provided by you and then contact you with an offer of our services according to your needs.

Legal basis: - Implementation of measures before the conclusion of the contract at your request

Purpose of processing: Negotiating a contract

Detailed description: We implement the agreement in writing. The parameters of your chosen service are included.

Legal basis: - Fulfillment of the contract you concluded with us

Purpose of processing: Marketing based on cookies

Detailed description: If you surf our website www.ProfiSMS.cz, we process your data mainly to improve our website (we monitor which parts of the website are attractive to you, what you are looking for, and what you are interested in). Following your visit to our website, we display our advertising banners when you visit other websites.

Legal basis: - Consent

Purpose of processing: Management of the contractual or commercial relationship throughout its duration

Detailed description: During our contractual relationship, we need to communicate with each other to ensure mutual satisfaction and smooth performance of the contract.

Legal basis: - Fulfillment of the contract we concluded together

Purpose of processing: Accounting and tax agenda

Detailed description: Companies must keep accounts and pay taxes. We therefore process personal data to the extent necessary to fulfill this obligation.

Legal basis: - Fulfillment of legal obligations

- Accounting Act
- Income Tax Act

Purpose of processing: Contentious agenda: determination, exercise, or defense of our legal claims including debt collection

Detailed description: Unfortunately, sometimes it can happen that we do not manage to find a common language. If a dispute arises between us that cannot be resolved by mutual agreement and is submitted to a court or competent supervisory authority for resolution, we will also use personal data to the extent necessary to protect our rights. We may also use personal data to enforce our claims or as part of negotiations with third parties who are interested in assigning our claim to you, including the implementation of this assignment.

Legal basis: - Legitimate interest

Purpose of processing: Performance of the work of the commissioner for the protection of personal data and the processing of requests from data subjects for the exercise of rights

Detailed description: ProfiSMS has appointed a Personal Data Protection Officer. The personal data protection officer is, among other things, the point of contact for personal data subjects and, as part of the performance of his function, he is also responsible for monitoring the compliance of ProfiSMS with the personal data protection legislation.

We are also obliged to process personal data in connection with request rights according to the GDPR, which may be submitted by the data subject.

Legal basis: Compliance with legal obligations - GDPR

HOW DOES PROFISMS PROCESS MY PERSONAL DATA?

The processing of personal data takes place manually in electronic information systems in electronic form or manually in paper form, always with high technical, organizational and personnel security in accordance with legislative requirements.

In accordance with the comprehensive internal regulatory base, personal data are under constant physical, electronic and procedural control. In order to protect data, the so-called information security management system and the related organizational and technical protection security are clearly defined, incl. technical, organizational and personnel measures. For maximum safety, control, technical and safety procedures defined by law and internal regulations are implemented.

WHICH RIGHTS CAN I EXERCISE IN CONNECTION WITH THE PROCESSING OF PERSONAL DATA AT PROFISMS?

You have the right to access, correct or delete personal data relating to you, or limit processing, object to processing, and transfer personal data.

The exercise of these rights is free of charge. In the event that your requests are clearly unreasonable or unreasonable, especially because they are repeated, we may charge you a reasonable fee taking into account the administrative costs associated with providing the requested information or communication or taking the requested actions, or refuse to comply with your request.

The deadline for processing your request is 1 month. If necessary and taking into account the complexity and number of applications, we can extend this period by another two months. We are obliged to notify you of the possibility to extend the deadline for processing your request and provide a proper justification.

Right of access – information about which of your personal data and how we process them, to whom we pass them on, etc., can be found in this information memorandum. If you exercise the right of access, we will provide you with an individualized overview of the personal data we process about you.

Right to rectification – if you discover that we are processing inaccurate data about you, you have the right to request their correction.

Right to erasure – if you believe that we are processing your personal data unlawfully, you have the right to request their deletion. Please note that the personal data we process about you for:

- (i) fulfilling our legal obligation,
- (ii) performance of the contract we concluded together,
- (iii) the determination, exercise or defense of our legal claims, or
- (iv) for archival, scientific or historical research or statistical purposes, we cannot

delete it even if you request it.

Right to restriction of processing - when exercising this right, the processing of the personal data in question is temporarily restricted. We will limit the processing of personal data in the following cases:

- (i) you dispute the accuracy of the personal data before a decision is made as to whether it is correct or not;
- (ii) if we process your personal data without a sufficient legal basis, but instead of erasing this data, you request restriction of its processing,
- (iii) if we no longer need your personal data for the aforementioned processing purposes, but you would require them to determine, exercise or defend your legal claims, or
- (iv) if you object to the processing of personal data. We are obliged to limit the processing of the subject personal data during the evaluation of the validity of the raised objection.

The right to object to processing – if the legal basis for the processing of your personal data is our legitimate interest (see above), you can object to such processing for reasons related to your specific situation.

In such a case, we will not further process your personal data for the given purpose, unless we demonstrate serious legitimate reasons for the processing that would prevail over your interests or rights and freedoms, or for the determination, exercise or defense of legal claims.

If you object to the processing of your personal data on the basis of a legitimate interest for marketing purposes, this objection will be accepted without further ado - in other words, you do not need to substantiate or justify this objection in any way and we will accept it.

The right to portability of personal data – if the legal basis for the processing of your personal data is consent or performance of a contract, you can request the transfer of your personal data. We will provide you with personal data relating to you that you have provided to us in a structured, commonly used and machine-readable format.

ProfiSMS does not accept personal data from other personal data administrators that you would like to have transferred to it.

Right to withdraw consent - You can revoke your consent to the processing of personal data at any time. However, revocation of consent does not affect the legality of processing based on consent prior to its revocation. The withdrawal of consent also has no effect on our contractual relationship.

The right to lodge a complaint with the supervisory authority - you can file a complaint with the Office for Personal Data Protection ("ÚOOÚ"), which is based at the address Pplk. Sochora 27, 170 00 Prague 7, phone: 234 665 111 (switchboard). ÚOOÚ operates the following websites: www.uoou.cz, where you can find more information about what and how ÚOOÚ can help you.

How can I exercise my rights above?

Please contact us via any of the contacts above.

HOW LONG DOES PROFISMS PROCESS MY PERSONAL DATA?

We process the personal data of clients for the duration of the contract, and then for the period during which we are obliged to keep this data according to generally binding legal regulations, and then we keep it for the period absolutely necessary in case we have to present evidence in court or administrative proceedings.

Personal data that we process on the basis of your consent are processed for the period for which you have given us consent, or until you withdraw your consent.

In accordance with the principle of data minimization, we always only process the personal data that we absolutely need for the given purpose and we keep them for the absolutely necessary time. As soon as the given period expires, the personal data are deleted, or anonymized.

WHO ELSE DOES PROFISMS ALLOW ACCESS TO MY PERSONAL INFORMATION?

Generally speaking, the recipient of personal data is any entity to which personal data is made available. Depending on the nature of the situation, the recipient of personal data can be either another personal data manager (itself determines the purposes and means of processing this personal data) or a personal data processor (it processes personal data for the personal data manager).

In principle, ProfiSMS does not share your personal data with other personal data managers, unless it is obliged or authorized to do so on the basis of a legal regulation, or your legitimate interest or you would give us your consent for it.

Your consent is not required to share personal data with personal data processors. We always carefully screen entities that are to become processors of personal data managed by ProfiSMS and ensure that they comply with appropriate technical and organizational security measures. A written contract on the processing of personal data is concluded with each entity that, as part of its activities for us, could become a processor of personal data that we

manage, and this processor is authorized to handle personal data only to the extent necessary to fulfill its task, for for the purposes of fulfilling his task and for the agreed period.

Suppliers

We may involve third parties – our suppliers – in some of our activities. Depending on the nature of the activity, your personal data may be processed by this supplier in the capacity of processor or administrator of personal data.

In addition, our suppliers are mainly:

- IT service providers

State administration bodies, enforcement of decisions

On the basis of legal regulations, we may under certain conditions be obliged to share your personal data without your consent with third parties (e.g. financial administration) for the purpose of fulfilling their obligations and, where appropriate, executing decisions.

IS MY PERSONAL DATA PROCESSED ABROAD?

Within the European Economic Area (“**EEA**”) the regime of free movement of personal data applies and the same rules apply to their processing as in the Czech Republic.

In some cases, it may happen that our suppliers process personal data in third countries (i.e. countries outside the EEA), but always in compliance with all legislative requirements.