

## Personal Data Protection Policy

### of ALDA hotel equipment a.s.

#### **PREAMBLE**

(A) ALDA hotel equipment a.s. respects your privacy and protects your personal data and always proceeds in accordance with 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 and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter referred to as "GDPR") and Act No. 110/2019 Coll., on the processing of personal data, as amended. ALDA hotel equipment a.s. therefore issues this Privacy Policy, the purpose of which is to provide you with information on the processing of personal data at ALDA hotel equipment a.s. (hereinafter referred to as the "Policy").

(B) This Policy applies to the processing of personal data of ALDA hotel equipment a.s. customers, prospective customers and other business partners of ALDA hotel equipment a.s. and, as appropriate, their representatives or contact persons, always to the extent appropriate to their position in relation to ALDA hotel equipment a.s.

#### **I. PERSONAL DATA CONTROLLER**

1.1. The controller of your personal data is ALDA hotel equipment a.s. with its registered office at Oskořínská 162, 289 31 Chleby, ID No. 07713606, VAT No. CZ07713606, registered in the Commercial Register maintained by the Municipal Court in Prague under the Commercial Register No. B 24018.

1.2 You can contact us, as administrator, by:

- at Oskořínská 162, 289 31 Chleby;
- by email: [alda@alda.cz](mailto:alda@alda.cz);
- by phone: +420 325 531 625.

1.3 ALDA hotel equipment a.s. has not appointed a data protection officer.

#### **II. CATEGORIES OF PERSONAL DATA, PURPOSE OF PROCESSING PERSONAL DATA, LEGAL BASIS FOR PROCESSING, METHOD OF PROCESSING**

2.1 As a data controller, we process mainly the following categories of personal data:

##### **Identifying personal data**

- name and surname;

- business name;
- tax identification numbers;
- login name and password.

#### **Contact personal data**

- address of registered office or place of business;
- delivery address;
- billing address;
- phone number;
- email.

#### **Payment details**

- bank account number.

#### **Details of your orders**

- the goods you have purchased;
- your delivery and payment method;
- complaints.

2.2 Special categories of personal data within the meaning of Article 9 of the GDPR, such as information about racial or ethnic origin and political opinions, etc., are not requested and are not processed.

2.3 We collect personal data from you mainly from your enquiries and orders, including orders at <https://www.alda.cz/>, from communications between us in any form, including the contact form at <https://www.alda.cz/cs/kontakt> and also through the registration form at <https://www.alda.cz/cs/registrace>.

2.4 We process your personal data on the basis of the legal grounds set out below:

- Article 6(1)(b) GDPR, according to which the processing is necessary for the performance of the contract;
- Article 6(1)(c) GDPR, according to which processing is necessary for compliance with a legal obligation;
- Article 6(1)(f) GDPR, according to which processing is necessary for the purposes of legitimate interests.

We do not need your consent to process your personal data for the above reasons.

2.5 We need your personal data to make you an offer of goods, to respond to your questions and enquiries, to maintain your user account on <https://www.alda.cz/>, to enter into a purchase contract with you, to deliver the goods to you under the contract and subsequently to handle your claims and to fulfil our other obligations and exercise our rights under the contract. We therefore need personal

data primarily for the conclusion and subsequent performance of the contract. Without the provision of personal data, we would not be able to conclude a contract with you and we would not be able to deliver the goods to you.

2.6 In some cases, we are required to process your personal data directly by law. This is in particular the fulfilment of the obligations required by Act No. 563/1991 Coll., on Accounting, as amended. For this reason, we must also request certain data from you and must process it for at least the period of time stipulated by law.

2.7 We also process your personal data for the purpose of protecting our legitimate interests. We consider our legitimate interests to be (a) the protection of our rights under the concluded contract if there is a breach of the contract by you, (b) our protection if you make any claim against us in connection with an enquiry, order or conclusion, (c) the improvement of the quality of the services provided and the supply of goods, (d) the keeping of records of the transactions carried out, (e) the sending of commercial communications.

2.8 In the event that we have no other legal basis for processing (in particular any of the reasons set out in paragraph 2.4 above), we will only process your personal data with your consent under Article 6(1)(a) of the GDPR. The provision of such consent is voluntary. Consent to processing may be withdrawn at any time, but prior processing is not affected by withdrawal of consent.

2.9 We use consent to the processing of personal data as a reason for processing your personal data for the purpose of sending you commercial communications (in particular email marketing and telemarketing). However, if you do not give us consent and you are our customer, we may send you commercial communications or call you with an offer even without your consent to the processing of your personal data. However, even in this case, we will ask you whether you consent to the sending of commercial communications and you have the possibility to withdraw this consent.

2.10 In some cases, the same personal data may be processed for different purposes and the processing may be based on more than one legal ground.

2.11. The processing of your personal data is carried out by means of computer technology or, in the case of personal data in paper form, manually, in compliance with all security principles for the management and processing of personal data in accordance with the relevant legislation governing the protection of personal data. To this end, we have adopted the appropriate technical and organisational measures, which we regularly review and update.

2.12 There is no automated decision-making or profiling in the processing of your personal data.

### **III. PERIOD OF PROCESSING OF PERSONAL DATA**

3.1 We process your personal data only for the necessary period of time, which is individual for each processing purpose. This may be for the time necessary to achieve the purpose for which the personal data was obtained or for the time required by law. Unless we have another reason for further processing, personal data will generally be processed in the following cases:

- a. personal data necessary for the performance of the contract for the entire period of performance of the contract;
- b. personal data processed on the basis of legitimate interests under paragraph 2.7(a) and (b) of this Policy for the duration of the limitation periods;
- c. personal data processed for the performance of legal obligations for the period of time specified by the relevant legislation, e.g. the Accounting Act;
- d. personal data processed with your consent for a period of five years after obtaining your consent or until such consent is withdrawn.

#### IV. RECIPIENTS OF PERSONAL DATA; TRANSFERS OF PERSONAL DATA TO THIRD COUNTRIES

4.1 In some cases, we transfer your personal data to other persons (recipients), namely:

- a) to carriers of goods and other shipments so that we can deliver the goods and other shipments to you;
- b) to processors who provide information technology management services for us.

4.2 We do not transfer your personal data to third countries or international organisations.

#### V. YOUR RIGHTS IN RELATION TO PERSONAL DATA

5.1 You have the right to confirm whether or not your personal data is being processed and, if we are processing your personal data, you have the right to access that personal data and information to the extent provided for in Article 15 of the GDPR, in particular information about:

- the purpose of processing;
- the category of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed;
- the intended period for which the personal data will be stored;
- your rights in relation to the processing of personal data;
- any available information about the source of the personal data, unless it has been obtained directly from you;
- whether automated decision-making, including profiling, is taking place.

5.2 With regard to personal data, you have, inter alia:

- the **right to rectification of personal data** pursuant to Article 16 of the GDPR if we process inaccurate personal data concerning you or you have the right to have incomplete personal data completed;

- the **right to erasure of personal data** ("right to be forgotten") pursuant to Article 17 GDPR, on the basis of which we, as the controller, will erase your personal data if one of the grounds for doing so is given;
- the **right to restrict the processing of your personal data** pursuant to Article 18 GDPR;
- the **right to the portability of personal data** pursuant to Article 20 GDPR;
- the **right to object to the processing of personal data** pursuant to Article 21 GDPR;
- the **right to lodge a complaint with the supervisory authority**, which is the Office for Personal Data Protection.

5.3 If we become aware of a personal data breach or suspect that a personal data breach has occurred, we will assess whether a breach has actually occurred, assess the severity and, depending on the severity (no risk, low risk, high risk), notify you and the supervisory authority, which is the Office for Personal Data Protection, of the breach.

5.4 If you wish to exercise any of the rights set out above or if you become aware or believe that personal data is being processed in breach of the protection of privacy and personal life or in breach of the law, please do not hesitate to contact us at any time.

5.5 If the processing of your personal data is based solely on consent, you have the right to withdraw that consent at any time.

5.6 If you discover or believe that your data protection rights have been violated, you may contact the supervisory authority directly, which is the Data Protection Authority.

## VI. USEFUL CONTACTS

*ALDA hotel equipment a.s.*  
*Oskořinská 162, 289 31 Chleby*  
*IČO 07713606 DIČ CZ07713606*  
*E-mail: [alda@alda.cz](mailto:alda@alda.cz)*  
*Tel.: +420 325 531 625*  
*www: <http://www.alda.cz>*

*Data Protection Authority*  
*Pplk. Sochora 27*  
*170 00 Praha 7*  
*E-mail: [posta@uouu.cz](mailto:posta@uouu.cz)*  
*Tel.: +420 234 665 111*  
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