

Processing of Personal Data

At TALKEY, a.s., Company ID: 091 01 942 (hereinafter referred to as “we”), we pay great attention to the protection of personal data. This document provides information on what personal data we process, especially regarding our customers and users of our website, whether we process data based on consent or another legal ground, for what purposes we use it, to whom we may disclose it, and what rights you have in relation to the processing of your personal data.

What personal data do we process?

When you use the aloo chat, we do not collect or record any data about your use of this product. When you browse our website, we track the device you use to access it and what interests you. If you make a purchase with us, we also process your personal data..

We process the following personal data:

Identification data, primarily your name and surname, or in the case of legal entities, the company name, Company ID (IČO), and Tax ID (DIČ) if you are a business;

Contact data, i.e., personal data that allows us to contact you, such as email address, phone number, delivery address, billing address, and your social media contact;

Order data, including details about the number of licenses you ordered, payments including bank account number, and any inquiries or complaints;

Data on your behavior on the website, particularly the links you click, navigation and scrolling on the website, and data about the device from which you view the website, such as IP address and derived location, device identification, technical parameters like operating system and its version, screen resolution, browser and its version, and data obtained from cookies and similar technologies for device identification;

Data on your behavior when reading messages we send, including times when messages are opened and device data, such as IP address and derived location, device identification, operating system and version, screen resolution, browser and version;

Derived data, i.e., personal data inferred from your behavior on the website and in emails we send, especially regarding gender, age, financial situation, purchasing behavior, and preferences for various goods and services;

Data related to call center use, including recordings of phone calls with the call center, identification of messages you send, including identifiers such as IP addresses.

Why do we process your personal data and what is our legal basis?

We process personal data in various situations for different purposes. When you use our website, which utilizes cookies, we primarily use your data to monitor traffic and improve our services. If you make a purchase with us, we use your data to process your order, protect our legal claims, and comply with legal obligations. We also use your contact and other data to display and send personalized offers. With your consent, we provide data to third parties for displaying offers on other websites. The legal bases for processing personal data include: preparation or performance of a contract with you, compliance with legal obligations, our legitimate interests, or your consent.

We process personal data for various purposes and to varying extents either:

1. Without your consent, based on the performance of a contract, our legitimate interest, or legal obligation; or
2. based on your consent.

Which processing can be carried out without your consent depends on the purpose of the processing and your relationship with us — whether you are just a website visitor or make a purchase with us. We may also process your data if you are the recipient of goods or services ordered from us, or if you communicate with us.

A/ If you visit our website

Use of cookies and other technologies, sharing data with advertising and social networks.

When you visit our website, we store and subsequently read small files, such as cookies, on your device. A cookie is a small file of letters and numbers that we store in your web browser or on your computer's hard drive. Some cookies allow us to link your activities during your website visit from the moment you open the browser window until you close it. When you close the browser window, these cookies are deleted. Others remain on the device for a set period and activate each time you visit a webpage that created that particular cookie. We also use pixel tags (also known as web beacons), which are small images that function similarly to cookies. Unlike cookies, which are stored on the computer's hard drive, pixel tags are a fixed part of the website. For simplicity, in this document, we will refer to all these technologies collectively as cookies. We not only store cookies on your device but also read cookies that our website has placed on your device. For simplicity, we will refer only to storage in this document.

Some cookies are stored directly by our website. These help us to:

1. identify you as you navigate our website and during repeat visits, e.g., remembering which version of our website to display if multiple variants exist;
2. record your consent according to this document, or your participation in surveys;
3. ensure security, e.g., detect unauthorized use of your connection;
4. monitor, troubleshoot, and correct website errors.

Such cookies are essential for the functioning of our website. Blocking these cookies may prevent proper functionality and limit our ability to provide products and services.

Additionally, on your device:

1. We store cookies that allow us to:
 - § Track website traffic, individual pages, create statistics, and measure advertising effectiveness;
 - § Display different versions of our website if testing new features;
 - § Personalize content and offers on our website;
2. We allow third-party cookies, which can be used to:
 - § Collect data about your behavior on our site and others;
 - § Display personalized offers and targeted advertising on other websites;
 - § Connect with social networks, e.g., Facebook, including automatic login, “Like” buttons, Messenger notifications, and display of personalized offers on other websites.

For the purpose of displaying personalized offers and targeted ads within advertising and social networks on websites other than ours, we also share data on your website behavior with advertising and social network partners. We do not share your identification data with such partners.

Use of cookies and other technologies, transfer of data to advertising and social networks

If you visit aloo.cz, we process your website behavior data based on our legitimate interest (i.e., without your consent) for:

1. Obtaining information to improve our website for you; our legitimate interest here is improving our services for you;
2. Creating statistics and overviews, especially monitoring website traffic, individual pages, and measuring advertising effectiveness; our legitimate interest here is measuring the efficiency of our website and advertising expenditure; for this purpose, we may derive additional data from your website behavior and, if necessary, pseudonymized data may be shared with partners for commission accounting;
3. Testing new functions and applications before deployment, especially to prevent functionality issues that could impair your shopping experience; our legitimate interest here is smooth operation of our services for you;
4. Preventing attacks on our website and ensuring its functionality and the security of your data; our legitimate interest here is smooth operation of our services and data security.

Data about your website behavior is not obtained only from cookies. We supplement it with:

1. Your device's IP address (the address used to communicate with other devices on the internet);
2. Your device's operating system, version, and language settings;
3. The browser you use, its version, and language settings;
4. The URL of the website from which you came to ours.

For these purposes, personal data is used for up to 38 months, during which time data is stored only in pseudonymized form. You have the right to object to this processing.

Cookie Name/Publisher	Cookie Type	Expiration	Visible to Third Party?
CONSENT	technical	19 years	no
PHPSESSID	technical	session	no
IDE	remarketing	1 year	DoubleClick (Google)
ANID	remarketing	1 year	Google
NID, 1P_JAR	Google*	1 day	Google
_fbp	tracking	3 months	Meta(Facebook)
_ga	traffic measurement and e-commerce	2 years	Google
_gat_gtag_UA_150673517_1	tracking	session	Google
_gid	tracking	1 day	Google
fr	Facebook**	unlimited	Meta(Facebook)
_hjIncludedInSample	tracking	Session	Hotjar
_hjid	tracking	1 year	Hotjar

Google* : Google uses these cookies based on recent searches and interactions and customizes ads on Google websites.

Facebook** : Facebook uses these for a range of advertising products, such as real-time third-party offers.

B/ If you make a purchase or contact us

In order to make a purchase from us, you must visit our website, and therefore the processing described in the section If you visit our website applies to you. In case you make a purchase from us, we additionally carry out the following processing:

Processing based on contract performance

If you make a purchase from us as an individual, we process your personal data for the purpose of handling your order, including your identification and contact details and information about your orders.

If you make a purchase from us as a representative of a legal entity, we process the same data for the same purpose based on our legitimate interest in concluding and performing a contract with the entity you represent.

Using this data for the purpose of handling your order means that we use it in particular:

1. to enable you to complete your order on the website;
2. to communicate with you regarding the order, for example to send you confirmation or notify you of the shipment of the product;
3. for payment processing for the product; in this regard, we may also share your data with our partners operating payment systems, as described in the section *Who processes your personal data and to whom we transfer it?*
4. in connection with complaints about the ordered product;
5. in connection with other requests you submit to us in writing or electronically, as described in the section *If you communicate with us via different channels.*

For this purpose, we use personal data for the time necessary to handle your order or fulfill the contractual request, such as a complaint.

Processing based on legitimate interest

If you make a purchase from us, we retain your identification and contact details and information about your orders based on our legitimate interest (without your consent) for the purpose of protecting legal claims and for our internal recordkeeping and control. Our legitimate interests here are the protection of legal claims and the control of proper provision of our services.

Furthermore, based on our legitimate interest (i.e., without your consent), we process your identification and contact details, your settings, and data about your orders (if you make future purchases) for the purpose of:

1. obtaining information to improve our services in the future so that your shopping experience is even better, especially by assessing your satisfaction with our services; our legitimate interest here is to improve our services for you
2. customizing the functionality of our website to your needs; for this purpose, we also process your IP address and the location derived from it,
3. providing personalized offers and targeted advertising, which we may send via email, text message, social media, telephone, other electronic means, or by post; our legitimate interest here is the effective promotion of our products and services. To prepare personalized offers, we analyze the above-mentioned data (i.e., your identification and contact details and information about your orders) and derive additional data, which we use for this purpose. Based on these data, we also segment our users into different groups, with each group receiving a specific offer.

For the purpose of protecting legal claims and our internal recordkeeping and control, we process data for the duration of the statute of limitations of 3 years and one year after its expiration concerning claims asserted at the end of the limitation period. In the event of court, administrative, or other proceedings, we process your personal data to the necessary extent throughout such proceedings and for the remaining part of the limitation period after their conclusion.

For other aforementioned purposes, we use personal data for a maximum of 6 months.

You have the right to object to processing carried out based on our legitimate interest.

Processing based on compliance with legal obligations

We also must comply with certain statutory obligations. If we process your personal data for this reason, we do not need to obtain your consent. On this legal basis, we process your identification and contact details and order information in order to comply in particular with the following laws:

1. Act No. 89/2012 Coll., Civil Code,
2. Act No. 634/1992 Coll., on Consumer Protection,
3. Act No. 235/2004 Coll., on Value Added Tax,
4. Act No. 563/1991 Coll., on Accounting.

For these purposes, we use personal data for a maximum of 10 years from the issuance of the last document related to your order.

C/ If you are the recipient of goods or services ordered from us

If you are the recipient of goods or services ordered from us, we process your identification and contact data:

1. based on our legitimate interest for the purpose of preparing, concluding, and performing a contract with our customer. The fulfillment of this contract is also our legitimate interest;
2. based on our legitimate interest to obtain information to improve our services in the future, or information for preparing our internal statistics and reports; our legitimate interest here is to improve our services for our customers;
3. for compliance with legal obligations, especially under Act No. 235/2004 Coll., on Value Added Tax, and Act No. 563/1991 Coll., on Accounting;
4. for the purpose of protecting legal claims and our internal recordkeeping and control; our legitimate interests here are the protection of legal claims and control of proper provision of our services.

For preparing, concluding, and performing a contract with our customer, we use personal data for the time necessary to process the order. After this period, we further retain data based on our legitimate interest for the purpose of protecting legal claims and our internal recordkeeping and control for the duration of the 3-year limitation period and one year after its expiration concerning claims asserted at the end of the limitation period. In the event of court, administrative, or other proceedings, we process your personal data to the necessary extent throughout such proceedings and for the remaining part of the limitation period after their conclusion. Our legitimate interests here are the protection of legal claims and control of proper provision of our services. For the purpose of fulfilling legal obligations, we use personal data for a maximum of 10 years for the relevant order.

You have the right to object to this processing based on legitimate interest.

D/ If you communicate with us via different channels:

If you communicate with us via different channels, especially by telephone, email, chat tools, or social networks, we will process your identification and contact data and records of the communication, including call recordings, based on our legitimate interest (i.e., without your consent) for the purpose of:

1. handling your requests; if you have purchased from us and your request relates to the order, we may carry out this processing based on performance of the contract with you;
2. recording your requests so that we can monitor that they are properly and timely fulfilled;
3. proving that we have received and processed your request, e.g., if you order goods or make a complaint through these channels;
4. analyzing them to improve the quality of our services.

For these purposes, we retain personal data for 3 months. If you place an order using any of these channels, we may retain the data to protect legal claims for the duration of the 3-year limitation period and one year after its expiration concerning claims asserted at the end of the limitation period. In the event of court, administrative, or other proceedings, we process your personal data to the necessary extent throughout such proceedings and for the remaining part of the limitation period after their conclusion.

You have the right to object to processing based on our legitimate interest.

o Who processes your data and to whom we transfer it?

In most cases, we process your data for our own purposes as the controller. In such cases, we share your data with our partners to ensure payment and other requirements of your order. We also share data with our processors, who process it according to our instructions. With your consent, we may also share data with advertising and social networks to display tailored ads on other websites and with our partners.

All the aforementioned personal data are processed by us as the controller. This means that we define the purposes for which your personal data are collected, determine the means of processing, and are responsible for their proper execution.

We may also transfer your personal data to other entities acting as controllers, namely:

a/ in connection with fulfilling your order to our partners involved in the fulfillment, as described in the section *When you purchase from us*, specifically:

1. partners operating payment systems to ensure payment, especially for card payments, particularly ComGate Payments a.s., ID: 27924505, with registered office at Gočárova třída 1754 / 48b, Hradec Králové
2. shipping partners, particularly DHL Express (Czech Republic) s.r.o., ID: 25683446, with registered office at Nádražní 2967/93, Moravská Ostrava, 702 00 Ostrava, PPL CZ s.r.o., ID: 25194798, with registered office at K Borovému 99, Jazlovce, 251 01 Říčany, if they deliver your order;
3. our partners in partner sales, if the goods from your order are supplied by any of these partners, solely for the purpose of delivery of these goods and potential complaint handling;

b/ based on your consent to advertising and social networks, as described in the section *Use of cookies and other technologies, sharing data with advertising and social networks*, specifically:

4. Google Ireland Limited (registration number: 368047), with registered office at Gordon House, Barrow Street, Dublin 4, Ireland; privacy policy available here: <https://policies.google.com/technologies/ads>

5. Facebook Ireland Limited, with registered office at 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, D02 X525, Ireland; privacy policy available here: <https://cs-cz.facebook.com/about/privacy>

We also use the services of other processors who process personal data only according to our instructions and for the purposes described in the section *Why we process personal data and what authorizes us*. Such processors include:

6. providers of cloud services and other technology and support providers who assist us in website optimization and personalization of content and offers for you: K2 connect solution s.r.o., ID: 27787966, with registered office at Koksární 1097/7, 702 00 Ostrava – Přívoz
7. providers of marketing tools, such as DVA MLUVČÍ s.r.o., ID: 02739321, with registered office at Kukučínova 799/10, Hulváky, 709 00 Ostrava, ActiveCampaign, LLC, privacy policy available here: <https://www.activecampaign.com/gdpr-updates/>

o **Sources of personal data**

We usually obtain personal data directly from you via our website or during communication with you. Some additional data may also be received from our partners, e.g., banks.

In most cases, we process personal data that you provide when ordering goods or services or when communicating with us, for example by telephone or email. Personal data are also collected directly from you by monitoring your behavior on our website and when reading messages.

If you make a purchase, in connection with fulfilling the concluded purchase contract, we may receive additional data about your orders from banks or our partners operating payment systems, such as account number or confirmation of successful payment.

o **Transfer of data outside the EU**

Your personal data may, in some cases, also be transferred to countries that are not part of the European Economic Area.

As part of the transfer of data to our processors, listed in the section *Who processes your personal data and to whom we transfer it*, we may also transfer your data to third countries outside the European Economic Area that do not ensure an adequate level of personal data protection. All such transfers will only be carried out if the respective processor commits to comply with the standard contractual clauses issued by the European Commission and available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2004:385:0074:0084:CS:PDF>

o **What rights do you have regarding personal data processing?**

Regarding your personal data, you have a number of rights. These include the right of access, correction, deletion, restriction of processing, portability, objection, and lodging a complaint.

Just as we have our rights and obligations when processing your personal data, you also have certain rights regarding the processing of your personal data. These rights include:

Right of access

You have the right to know what data we process about you, for what purpose, for how long, where we obtain your personal data, to whom we transfer it, who processes it outside of us, and what other rights you have in connection with the processing of your personal data. All this information can be found in this document, the *Privacy Policy*. However, if you are unsure which personal data we process about you, you may request confirmation from us as to whether personal data concerning you are being processed by us or not, and if they are, you have the right to access such personal data. Under the right of access, you may request a copy of the

personal data being processed; the first copy will be provided free of charge, and additional copies will incur a fee of CZK 2,000.

Right to correction

To err is human. If you find that the personal data we process about you are inaccurate or incomplete, you have the right to have them corrected or supplemented without undue.

Right to deletion

In certain cases, you have the right to request the deletion of your personal data. We will delete your personal data without undue delay if one of the following reasons applies:

1. Your personal data are no longer necessary for the purposes for which we processed them;
2. You withdraw consent for the processing of personal data, where such consent is necessary for processing and we have no other reason to continue processing such data;
3. You exercise your right to object to processing (see the section *Right to object to processing*) regarding personal data we process based on our legitimate interests, and we find that we no longer have any legitimate interests that justify such processing; or
4. You believe that our processing of personal data has ceased to comply with applicable law.

However, please note that even if one of these reasons applies, it does not mean that we will immediately delete all your personal data. This right does not apply if the processing of your personal data is still necessary to fulfill our legal obligations or to establish, exercise, or defend our legal claims (see the section *Why we process personal data and what authorizes us*).

Right to restriction of processing

In some cases, in addition to the right to deletion, you may exercise the right to restrict the processing of personal data. This right allows you, in certain cases, to request that your personal data be marked and not subject to any further processing operations – however, not permanently (as with the right to deletion), but for a limited period. We must restrict the processing of personal data when:

1. You dispute the accuracy of personal data, until we determine which data are correct;
2. We process your personal data without a sufficient legal basis (e.g., beyond what we are required to process), but you prefer restriction rather than deletion of such data (e.g., if you expect to provide us with such data again in the future);
3. Your personal data are no longer necessary for the purposes of processing mentioned above, but you require them for the establishment, exercise, or defense of your legal claims; or
4. You raise an objection to processing. The right to object is described in more detail below in the section *Right to object to processing*.

During the period in which we investigate your justified objection, we are obliged to restrict the processing of your personal data.

Right to data portability

You have the right to obtain from us all personal data that you provided to us and which we process based on your consent (see the section *If you give us your consent*) and based on contract performance. We will provide your personal data in a structured, commonly used, and machine-

readable format. To facilitate this transfer, the data must be those we process automatically in our electronic databases.

Right to object to processing

You have the right to object to the processing of personal data carried out on the basis of our legitimate interest (see the section Why we process personal data and what authorizes us). In the case of marketing activities, we will cease processing your personal data without further action; in other cases, we will do so unless we have compelling legitimate reasons to continue such processing.

Right to lodge a complaint

Exercising the rights described above does not affect your right to lodge a complaint with the relevant supervisory authority. You may exercise this right, especially if you believe that your personal data are being processed unlawfully or in violation of applicable laws. A complaint regarding our processing of personal data may be submitted to the Office for Personal Data Protection, located at Pplk. Sochora 27, 170 00 Prague 7.

o How to exercise your rights and contact the data controller?

You can exercise all your rights by contacting the Controller. The Controller has not appointed a Data Protection Officer but has designated a person responsible for overseeing the proper processing of your personal data.

1. In person at Hrušovská 3203/13a, 702 00 Ostrava
2. By letter sent to TALKEY, a.s., Hrušovská 3203/13a, 702 00 Ostrava
3. By email sent to gdpr@talkey.com