



PRIVACY POLICY

In Roivenué s.r.o., CRN: 068 12 279, a company entered in the Commercial Register at the Municipal Court in Prague, Section C, File 289445 (hereinafter referred to as the „Roivenué“) we, as a data controller or a data processor, pay great attention to protecting your personal data.

Our registered office and mailing address:

Plynární 1617/10, Holešovice, 170 00 Prague 7

Phone number: +420 720 213 277

Contact e-mail (data protection officer): dpo@roivenué.com

Effective since: April 1st, 2022

You will also learn for what purposes we process your personal data, from which sources we obtain this data, who processes your personal data, to whom we transfer it, and how we ensure the security of your data. In the last section, we outline what rights you have when we process your personal data and how you can exercise them.

This Privacy Policy may be amended from time to time. The latest version of this Privacy Policy shall always apply.

A. CATEGORIES OF PROCESSED PERSONAL DATA

Below are the categories of personal data, including examples, that we process for the purposes set out in the following section. We also refer to these categories in other parts of this Privacy Policy:

a) Identification data

We process in particular the name and surname to be able to identify you while fulfilling the contract we have with you or the entity you are representing, or to identify you while you are using our service. Also, we process identification data of the communication recipients for purposes down below.

b) Contact details

We process in particular the e-mail address and telephone number so we can make our platform available to you and be able to communicate with you.

c) Payment and billing details

We process in particular the data about banking accounts and data from invoices to properly process your payments, where applicable.

d) Records of our mutual communication

We process any personal data contained in this communication as we record and further work with this communication.

e) Information about service performance

We are also processing data on performance of services provided by you or provided within our Roivenu service you use under the contract to us.

f) Information about usage of web presentation

By using the internet environment and visiting our website, you automatically send the IP address of your device. We can therefore detect the network number and subnet in which your device is located.

From the logs, where information about your activity on the website is also recorded for security reasons, we can read the length of a single login, the actions you have performed on the website and information about the data filled in the forms.

g) Information from cookies and other tracking technologies

If you have enabled the storage of so-called cookies in your browser, they send us additional information, for example about the pages you visit and the user preferences on your computer.

For the optimal display of our website and services, we use information about your operating system (for example, Windows or macOS), its version and technical data about the devices from which you log in (for example, the type of your smartphone). This helps us to continuously improve our services and adapt them to your technical capabilities.

For more information on the use of cookies and similar technologies, please see section D "*Use of cookies and digital identifiers*".

B. PURPOSES OF PROCESSING

B.1 FOR OUR CUSTOMERS AND POTENTIAL CUSTOMERS

If you are our customer, your personal data, including personal data of your employees or other subcontractors, will be processed for the following purposes:

a) Fulfilment of contracts with our customers

Our processing of your personal data is necessary to successfully concluding supplying contracts with you and measuring your performance according to contract.

For this purpose, we process Identification data, Contact details, Payment and billing details, Records of our mutual communication, Information about service performance and Information from cookies and other tracking technologies.

The legal basis for processing here is usually our legitimate interest, as you are representing a legal person with whom we have contractual relationship. We generally retain your personal data for the duration of the contracting process and for the time we are fulfilling our mutual obligations from the contract.

b) Internal evidence and protection of our rights and claims

Our processing of your personal data is also necessary to properly protect our rights and claims and keep internal evidence of our subcontractors, including personal data needed for debt collection and/or effective defence in any dispute (defence of the legal claims of the controller in judicial, extrajudicial, enforcement or other similar proceedings where, without the use of the processed data, the protection of the our rights could be jeopardised or prevented).

For this purpose, we process Identification data, Contact details, Payment and billing details, Records of our mutual communication and Information about service performance.

The legal basis for processing here is our legitimate interest.

Personal data are generally retained for the duration of statutory limitation period, including any possible suspension or interruption of this period, but typically no longer than 16 years after the termination of contract with us (i.e. for as long as necessary to keep data about rights and claims arising mostly from contractual relationships).

c) Fulfilment of legal duties

We must comply with certain legal obligations imposed on us a data controller and business legal entity. Therefore, we need to process your personal data to properly address these legal obligations.

For this purpose, we may process various categories of personal data, especially Identification data, Payment and billing details, Contact details and Records of our mutual communication.

The legal basis for processing is compliance with legal obligation. Personal data are retained for the period set in the applicable legal regulation.

d) Improvement of our services

We are trying hard to improve what we do so we can provide you with better service. Therefore, we process some personal data to make our Roivenu application friendlier and more useable.

For this purpose, we may process various categories of personal data, especially Records of our mutual communication, Information about service performance and Information from cookies and other tracking technologies.

The legal basis for processing is our legitimate interest. We generally retain your personal data for the duration of the contracting process and for the time we are updating or improving our Roivenu service.

e) Marketing communication and promotion of our services

We often send our newsletter and/or marketing communication or process your personal data while trying to promote our Roivenu services.

For this purpose, we mainly process your Identification data and Contact details.

If you are our customer, we are eligible to offer you similar services related to services already provided. The legal basis for processing is our legitimate interest. We generally retain your personal data for the duration you are either our client or represent him and for 2 years after.

Also, if you signed for our webinars and/or meeting and actions, we may send you related communication that also includes marketing communication and promotion of our services.

Otherwise, you may also have given us your consent to receive marketing communication.

Your consent is given for a period of three years. However, you may withdraw your consent at any time. You also always have the right to opt-out of receiving further marketing communications at any time. To do that, follow the button "*Unsubscribe*" in received communication or notify us on dpo@roivenu.com.

B.2 FOR WEB VISITORS

If you visited our web presentation, your personal data will be processed for the following purposes:

a) Operation of web presentation and its security

Our processing of your personal data is necessary for our website operation, including presentation and functionality of the website and ensuring your safety on our website. Within this purpose, we identify you as a visitor during the web browsing or during repeated logins on our website.

For this reason, we process Information about usage of web presentation and Information from cookies and other tracking technologies, which is necessary for operation of web presentation.

The legal basis for processing here is our legitimate interest.

We generally retain your personal data for up to 2 years after yours visit to our web presentation.

b) Customization of web presentation (preferences)

Our processing of your personal data is necessary for keeping your preferences and customize web presentation following these preferences as well as simplify browsing our website for you. Within this purpose, we customize web presentation to your preferences, such as location, language choices and your device.

The legal basis for processing Information about usage of web presentation for this purpose is our legitimate interest on customization of web presentation to preferences of customers and we generally retain your personal data for up to 2 years after yours visit to our web presentation.

With your consent, we also process Information from cookies and other tracking technologies, which is necessary for customization of web presentation (preferential cookies), while your data may also be transferred to third parties. The legal basis for processing here is therefore your consent, given through the Cookies Sidebar. We retain your data for the duration of your consent but in any case, no longer than 2 years from receiving your consent.

c) Analysis of visits of web presentation (statistics)

Our processing of your personal data is necessary for understanding the way in which visitors use our web presentation. Within this purpose, we monitor traffic on our website, optimize our website, ensure the security both website and your data and make the web presentation more seamless and user-friendly.

The legal basis for processing Information about usage of web presentation for this purpose is our legitimate interest on gathering information about usage of our web presentation for its further improvement and we generally retain your personal data for up to 2 years after yours visit to our web presentation.

With your consent, we also process Information from cookies and other tracking technologies, which is necessary for customization of web presentation (statistical cookies), while your data may also be transferred to third parties. The legal basis for processing here is therefore your consent, given through the Cookies Sidebar. We retain your data for the duration of your consent but in any case, no longer than 2 years from receiving your consent.

d) Promotion and marketing on our web presentation (marketing)

Our processing of your personal data is necessary for gathering information about personal preferences of each user for presentation of advertisement and subsequent presentation of this advertisement. Within this purpose, we promote and market services and products on the website and show you marketing communication related to services and products you expressed your interest and promote our brand through online promotion.

The legal basis for processing Information about usage of web presentation for this purpose is our legitimate interest on promotion of the sale of our products and services and we generally retain your personal data for up to 2 years after your visit to our web presentation.

With your consent, we also process Information from cookies and other tracking technologies, which is necessary for customization of web presentation (marketing cookies), while your data may also be transferred to third parties. The legal basis for processing here is therefore your consent, given through the Cookies Sidebar. We retain your data for the duration of your consent but in any case, no longer than 2 years from receiving your consent.

C. SOURCES OF PERSONAL DATA

We process the data that you provide to us when we are concluding contract and when you are registering on and/or visiting our website.

We may also collect some of the data when you use our services and visit our website (including data about your behaviour on the platform) or when you communicate with us. We obtain other data by deriving it from the data set out above.

We may then receive additional personal data from our partners who are controllers of your personal data and who transfer it to us according to their own instructions and purposes: we are therefore data processors in relation to them. However, there may also be partners towards whom we will be in joint control. We also can receive technical data about the devices from which you log in (for example, the type of your smartphone). This helps us to continuously improve our services and adapt them to your technical capabilities.

D. COOKIES AND OTHER DIGITAL IDENTIFIERS

Each time you visit our website, we store cookies, which are small files containing information about your visit, on your device and read them on subsequent visits. We use both cookies that are deleted after your visit on our website and cookies that remain on your device for a set period, but no longer than 2 years. In addition to cookies, we also use other similar technologies, such as web beacons, or small images contained in our platform that are loaded by your device and have a similar function to cookies.

Some of the cookies we use are necessary for the proper operation of our web presentation of our website, for example, to secure your access to the website. Some cookies use your preferences to personalize the content of the website and mark content that you have already viewed. If you block these cookies in your browser, the website may not function properly, and it may not be technically possible to provide you with some of our services.

E. PROCESSORS AND OTHER PERSONAL DATA RECIPIENTS

The processing of your personal data involves processors who always process personal data for the purposes set out above and in accordance with our instructions. The current list of processors participating on provision of the Roivenu Service is listed below. This list includes analytics service providers such as Google and other companies in its group.

As part of the transfer of data to our processors, we may also transfer your data to third countries outside the European Union that do not ensure an adequate level of protection of personal data. We will only make any such transfers if the processor in question commits to comply with the standard contractual clauses issued by the European Commission and available at https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc/standard-contractual-clauses-international-transfers_en.

We also using processors for processing of data from our cookies and digital identifiers on our website. You can see what cookies are transferred to which processor here:

Name of Processor	Location of Processor	Type of cookies
Google LLC	Google LLC 1600 Amphitheatre Parkway Mountain View, CA 94043 USA	Operational (without consent) Statistical Marketing
Smartlook.com, s.r.o.	Šumavská 524/31, Veveří, 602 00 Brno	Statistical Marketing

F. MEASURES FOR DATA PROTECTION

Protecting your data is our priority. For this reason, we have adopted, maintain and continuously improve our technical and organizational measures to protect against the leakage, loss, deletion or misuse of personal data.

Customer and subcontractor information are stored in a database that is replicated to a separate location. All sensitive information and security-related information are either encrypted or in case of logs completely obfuscated.

We operate on a dedicated network infrastructure in multiple locations. Connections between individual locations is using dedicated fibre links or encrypted tunnelled connections over internet. The network is protected using load-balancers and firewalls.

G. YOUR RIGHTS RELATED TO PROCESSED PERSONAL DATA

Just as we have rights and obligations when processing your personal data, you have certain rights when we are processing your personal data. You can exercise all these rights, as well as make enquiries or complaints, by contacting us by email at dpo@roivenu.com. We will always deal with your request as soon as possible, but at the latest within one month. In exceptional cases, we may extend this period by a further two months, in particular due to the complexity of your request. We will inform you of this extension.

Specifically, you have the following rights in relation to the processing of your personal data:

a) Right to withdraw consent

You have the right to withdraw your consent to the processing of your personal data at any time where applicable. You can do this on our website, by a link a email or by sending an email with the

following text: *'I do not consent to the further processing of personal data for the purpose of promotion and marketing on your website'* or any similar text to e-mail address mentioned above. However, withdrawal of consent does not affect the lawfulness of processing prior to such consent. Please note that in this case, your personal data will be deleted, and some features of the services or website may not be accessible.

b) Right to access

You have the right to obtain confirmation from us as to whether we are processing your personal data.

If we are processing your personal data, you also have the right to request access to information about the purpose and scope of the processing, the recipients of the data, the duration of the processing, the right to rectification, erasure, restriction of processing and to object to processing, the right to lodge a complaint with a supervisory authority and the sources of the personal data (this information is already provided in this document).

You can also ask us for a copy of the personal data we process. We provide the first copy free of charge, others may already be subject to a fee. The scope of the data provided may be limited so as not to interfere with the rights and freedoms of others.

c) Right to rectification

You have the right to request us to correct inaccurate personal data concerning you. Depending on the purpose of the processing, you may also have the right to have incomplete personal data completed, including by providing an additional declaration.

d) Right to erasure (“right to be forgotten”)

You have the right to request the erasure of your personal data where:

- we no longer need your personal data for the purposes for which it was collected or processed;
- you withdraw the consent on the basis of which the personal data was processed and there is no further reason for processing it;
- you object to processing and there are no other purposes for processing, or you object to processing for direct marketing purposes;
- the personal data are processed against the law.

However, you cannot exercise this right if the processing is necessary for compliance with our legal obligations or for the performance of tasks in the public interest or for protection of our rights and claims.

e) Right to restrict the processing

You have the right to request restriction of the processing of your personal data where:

- you contest the accuracy of your personal data; in this case, you may request restriction of processing until the accuracy of the personal data is verified;
- the processing is against the law and you request restriction of the processing of your personal data instead of erasure;

- we no longer need your personal data for the purposes for which it was collected or processed, but you require it for the establishment, exercise or defence of your legal claims;
- you have objected to the processing of your personal data; in this case, you may request a restriction of processing pending verification that our legitimate interests prevail.

f) Right to portability

You have the right to obtain a copy of your personal data that we process by automated means on the basis of your consent or for the performance of a contract. We will transmit this data in a commonly used and machine-readable format to you or to a controller designated by you, if technically feasible. The scope of the data provided may be limited to avoid interference with the rights and freedoms of others.

g) Right to object to processing

You have the right to object to the processing of your personal data that we process on the basis of our legitimate interest. We will stop processing your data if there are no other reasons for processing or if the processing is not necessary for the protection of our rights and claims or if you object to processing for direct marketing purposes.

H. RIGHT TO LODGE A COMPLAINT

In addition to the possibility of exercising your rights with our company or our data protection officer, you may also lodge a complaint with the relevant supervisory authority, which is the Office for Personal Data Protection located at Pplk. Sochora 27, 170 00 Prague 7.