

# Privacy Environmental Policy

### Introduction

Immanency, spol. s ro IC 054 19 182 (hereinafter referred to as the "Controller") is committed to protecting the privacy and personal data of individuals in accordance with the European Union General Data Protection Regulation (GDPR). This Privacy Environmental Policy explains how the Controller processes personal data, the rights of individuals in relation to their personal data, and the measures taken to secure personal data.

Controller's Contact Details: Immanency, spol. s r.o. Korunní 2569/108, 101 00, Prague 10 Czech Republic info@immanency.cz +420 604 347 020

## Personal Data Processing

The Controller collects and processes personal data based on the following lawful grounds:

- The performance of a contract between the Controller and the individual (Article 6(1)(b) GDPR);
- The legitimate interest of the Controller in direct marketing, such as sending commercial messages and newsletters (Article 6(1)(f) GDPR);
- The individual's consent for the processing of personal data for direct marketing purposes, such as sending business communications and newsletters, pursuant to Article 6(1)(a) GDPR in connection with § 7 paragraph 2 of Act No. 480/2004 Coll., on certain information society services in the event that no goods or services have been ordered.

The personal data processed by the Controller includes the following:

- First and last name
- Company name
- Telephone
- Email
- Cookies

### **Data Retention Period**

The Controller stores personal data for the following periods:

• For the period necessary to exercise the rights and obligations arising from the contractual relationship between the individual and the Controller and to exercise



claims from these contractual relationships, for a period of 15 years from the termination of the contractual relationship.

• For the period until the consent to the processing of personal data for marketing purposes is revoked, no longer than .... years, if personal data is processed on the basis of consent.

After the personal data retention period has expired, the Controller deletes the personal data.

## Recipients of Personal Data

The Controller processes personal data and may also engage the following processors:

- Hubspot service provider
- Entities participating in the delivery of goods/services/realization of payments based on the contract
- Entities involved in ensuring the operation of services
- Entities providing marketing services.

The Controller does not intend to transfer personal data to a third country (a country outside the EU) or an international organization. Recipients of personal data in third countries are providers of mailing services/cloud services.

# **Individual Rights**

Under the GDPR, individuals have the following rights:

- The right to withdraw consent at any time;
  - The right to request information from the Controller about the personal data processed, request a copy of this data;
  - The right to request access to this data and have it updated or corrected, or request the Controller to delete this personal data;
  - The right to data portability;
  - The right to file a complaint with the Office for Personal Data Protection or go to court.

## **Security Measures**

The Controller has implemented technical and organizational measures to ensure the protection of personal data. These measures include:

- The use of secure system passwords and high-quality data backups;
- Technical measures to secure data repositories and personal data repositories in paper form;
- Only authorized personnel have access to personal data.



## Changes to the Policy

The Controller reserves the right to change this Privacy Environmental Policy at any time. The revised version of this Policy will be published on the Controller's website, or a new version of the Policy will be sent to the email address provided by the individual to the Controller.

#### Conclusion

By providing your personal data to Immanency, spol. s ro, you acknowledge that you have read and understood this Privacy Environmental Policy and that you agree to its terms. You also give your explicit consent to the processing of your personal data by Immanency, spol. s ro in accordance with this Policy.

It is important to note that you have the right to withdraw your consent at any time by contacting Immanency, spol. s ro using the contact details provided in this Policy. Additionally, you have the right to request access to, correction of, and deletion of your personal data, as well as the right to data portability, in accordance with the GDPR.

Immanency, spol. s ro has taken all appropriate technical and organizational measures to secure your personal data and ensure that only authorized personnel have access to it. However, it is important to remember that no security measures are foolproof, and Immanency, spol. s ro cannot guarantee the absolute security of your personal data.

Finally, Immanency, spol. s ro reserves the right to modify or update this Privacy Environmental Policy as necessary. If changes are made to the Policy, a new version will be posted on the Immanency, spol. s ro website or sent to the email address provided by you to Immanency, spol. s ro.

Thank you for your trust in Immanency, spol. s ro and for reading this Privacy Environmental Policy. If you have any questions or concerns about the Policy or the processing of your personal data, please do not hesitate to contact Immanency, spol. s ro using the contact details provided in this Policy.

These terms and conditions take effect 1. January 2020