



# PERSONAL DATA PROCESSING PRINCIPLES

## Choice QR s.r.o.

### 1. Basic provisions

1.1. These personal data processing principles (hereinafter “Principles“) govern personal data processing during the use of the Choice Application services (hereinafter “Choice Application“) by its users (hereinafter “User“ or “you“).

1.2. The owner and operator of the Choice Application, and the Personal Data Controller in the sense of Article 4 paragraph 7 of 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 (hereinafter “GDPR“) is Choice QR s.r.o., Identification Number: 09517600, registered office Rybná 716/24, Staré Město, 110 00 Prague 1, entered in the Commercial Register maintained by the Municipal Court in Prague, file reference C 337491 (hereinafter “Controller“ or “we“).

1.3. Please read how we collect, process and protect your personal data (this means any information relating to a directly or indirectly identified or identifiable natural person), if you use the Choice Application services. This document contains information about your rights.

1.4. The Controller’s contact details are as follows:

- delivery address: Rybná 716/24, Staré Město, 110 00 Prague 1;
- contact e-mail address: [info@choiceqr.com](mailto:info@choiceqr.com)
- telephone: +420 774 950 798

1.5. The Controller has not appointed a Data Protection Officer.

### 2. Definition of personal data

2.1. The Controller processes only personal data that the User themselves provided to them. The User declares that all personal data provided by the User to the Controller is truthful, accurate, up-to-date, correct and complete. The Controller does not assume any obligation to verify this information. If you provide any information that is false, inaccurate, out of date or incomplete, or if we have reasonable suspicion that the information is false, inaccurate, out of date or incomplete, then we are entitled to suspend or terminate our collaboration, and deny all current or future use of the Choice Application services (or any part thereof).

2.2. In connection with your use of the Choice Application services, the Controller processes the following personal data:

- identification details (in particular name, surname, username and password);
- contact details (in particular e-mail address and telephone number);

- payment details (in particular order payment information);
- delivery details (in particular delivery address);
- other information that you provide to us in connection with the use of the Choice Application services, or that we obtain in this context (information about your consumer behaviour etc.).

### **3. Conditions and purpose of the personal data processing**

3.1. The processing of personal data by the Controller is lawful, as at least one of the following conditions is always fulfilled during the processing:

- the User granted their consent to the processing of their personal data as per Article 6 paragraph 1 section a) of the GDPR for one or more specific purposes;
- the processing of the User's personal data is necessary for the fulfilment arising from the Contract to which the User is a party, or the implementation of measures taken before the conclusion of the Contract at this User's request as per Article 6 paragraph 1 section b) of the GDPR;
- the processing of the User's personal data is necessary for the fulfilment of the legal obligations that applies to the Controller; or
- the processing of the User's personal data is necessary for the purposes of the Controller's legitimate interests as per Article 6 paragraph 1 section f) of the GDPR.

3.2 In connection with the use of the Choice Application services, the Controller processes Users' personal data for the following purposes:

- processing based on the necessity of such processing for the separate fulfilment of the Contract concluded in connection with the provision of services via the Choice Application;
- processing based on the fulfilment of our legal obligations for the purposes of fulfilling these legal obligations;
- processing due to our legitimate interest, where this reason leads, in particular, to personal data processing for the purpose of direct marketing or for statistical and analytical purposes, for the storage of certain information for the purposes of the possible enforcement of ownership claims;
- processing based on your consent, if it was provided to the Controller, where personal data is processed for marketing and advertising purposes on the basis of this consent.

3.3 The personal data is processed for the period absolutely necessary with regard to the purpose of its processing, or for the period specified in the consent to the personal data processing.

3.4 With regard to the actual provision of services via the Choice Application, personal data is provided to the individual business partners whose services are mediated by the Choice Application.

3.5 With regard to the legal obligation to perform mandatory sanction and AML monitoring (anti-money laundering measures) of transactions executed via the Choice Application, personal data may be provided to Stripe ( stripe.com ), as the operator of the payment gateway in the Choice Application.

3.6 Based on the provided consent, personal data may be passed on, for advertising and marketing purposes, to the entities specified in the consent to the personal data processing.

3.7 Personal data is also provided, on the basis of legal regulations, to the entities specified in these legal regulations.

3.8 Your personal data is processed both manually and automatically, and is stored in both paper and electronic form.

3.9 We are committed to storing your data securely. For this reason, we have implemented appropriate physical, technical and organisational measures, as well as plans to protect and secure the data that we received from you (which however does not free you from the obligation to take appropriate steps to secure your data, particularly during data transfers). The aim is to prevent the unlawful or unauthorised processing of your personal data, or the random, unauthorised or unlawful disclosure, use, transfer, processing, copying, transmission, modification, loss or damage of your data. Despite all efforts to abide by the rules stipulated in the relevant legal regulations, it is not possible to ensure the security of your data if it is transmitted in an unsecured manner.

3.10 If you have chosen a password that shall allow you access to certain parts of the Choice Application, then you are responsible for keeping this password confidential. We ask you not to disclose this password to anyone.

## **4. Rights of the User as the data subject**

4.1 Based on the rules set forth in the GDPR, the User has, in particular, the right:

- to access their personal data;
- to the correction of the personal data, or a restriction of its processing;
- to the deletion of the personal data;
- to raise an objection against the personal data processing;
- to the portability of their personal data;
- to revoke their consent to the personal data processing;
- to file a complaint with the Office for Personal Data Protection, if they believe that the processing breached their right to the protection of the personal data during its processing, or a related legal regulation.

4.2 To exercise any of these rights, the User can contact the Controller using the afore-mentioned contact details. The Controller shall advise or assist Users with the exercise of their rights. You also have the right to file a complaint with the supervisory body, the Office for Data Protection of the Czech Republic. You can learn more at <https://www.uoou.cz>.

## **5. Final provision**

5.1 By checking the consent box on the relevant form and/or active use of the Choice Application or related services, the User confirms that they have been familiarised with these Principles, and that they accept them in full.

5.2 These Principles are governed by the law of the Czech Republic. The general courts of the Czech Republic are authorised to arbitrate related legal disputes between the Controller and the User.

5.3 The Controller is entitled to unilaterally amend the wording of these Principles if necessary. The Controller shall always announce the amendment before it comes into effect, by displaying an announcement in the Choice Application and/or sending a notification to the User's e-mail address.

5.4 These Principles come into effect on 26/03/2020.

