

## PROTECTION OF PERSONAL DATA

**GDPR READY - PERSONAL DATA PROCESSING PRINCIPLES** IN RELATION TO FILLING WEB FORMS ON WWW.CAPITAL-ANALYSIS.COM, REGISTRATION TO THE CLIENT SITE OF THE WEBSITE AND USING WEBSITE WWW.CAPITAL-ANALYSIS.COM FROM THE USER SITE

### ***1. Information about the personal data controller and basic concepts.***

The administrator of personal data is the operator of the website [www.capital-analysis.com](http://www.capital-analysis.com) company Obchodni Systemy s.r.o. based in Žirovnická 3133/6, Záběhllice, 106 00, Prague 10, Czech Republic, which offers analytical information V.I.P. Capital Analysis service. As a Service Provider ("Administrator"), it processes personal data in accordance with Act No. 101/2000 Coll., On Personal Data Protection and with effect from 25 May 2018, in accordance with Regulation (EU) No. 2016/679, on the protection of individuals with regard to the processing of personal data ("the Regulation" or "GDPR").

Personal data means all information about the User, on the basis of which the user can be directly or indirectly identified, especially by reference to a specific identifier.

The data subject is a natural person to whom personal data relate in the position of the Service User. The data subject is not a legal entity. Data relating to a legal entity are not personal data.

Processing means any operation or set of operations with personal data or files of personal data carried out with or without automated procedures such as gathering, recording, arranging, structuring, storing, limiting, erasing or destroying, etc.

### ***2. Personal data and sensitive data.***

Personal data means information about the registered entity (User), on the basis of which the entity can be directly or indirectly identified. Sensitive data means information about the subject, referring to national, racial or ethnic origin, political attitudes, trade union membership, religion and philosophical beliefs, criminal convictions, health and sexual life of the data subject and any data subject's genetic data, or any a biometric data that allows direct identification or authentication of the data subject.

### ***3. Scope of personal data.***

In accordance with the request of the registering entity (User) to access the content of [www.capital-analysis.com](http://www.capital-analysis.com), which this entity confirms by completing and sending the registration form there or creating an order, the Website Operator (hereinafter referred to as the "Operator") mandatory personal data. The registrant may voluntarily provide the Operator with additional optional data at its discretion.

### ***4. Scope of sensitive data.***

The provision of any sensitive data is optional. The operator does not require or require any sensitive data. If the registrant provides any sensitive data during the registration, he does so voluntarily.

### ***5. Personal data protection***

The operator collects and stores personal data entered by the registered person through electronic data carriers in a secure database. The operator protects personal data to the maximum extent possible by means of modern technologies corresponding to the level of technical development. The Operator declares that it has taken all possible, ie currently known measures, to secure this data from unauthorized interference by third parties.

The Operator shall not be liable for any unauthorized interference of third parties resulting in the unauthorized access to the personal data of registered entities and / or their user account and / or the relevant database of the Operator, and the data will be used, third parties.

## ***6. Data handling restrictions.***

The Operator will not process, share, sell or use the data registered from his / her personal data entered in the user account without the registered person's permission in a way that would be in conflict with this Privacy Policy.

## ***7. Processing of personal data***

The Registered Entity acknowledges and agrees that the Operator is authorized to process, collect personal data of the Registered Entity for the purpose of providing and improving its services under these Conditions and for statistical purposes.

## ***8. Scope, purpose of processing, legal title, time and manner***

The Provider is entitled to process, collect the User's personal data provided by the Provider of its own free will for the purposes of:

- **provision of services and performance of the contract:** either in the form of access to the complete content of the website [www.capital-analysis.com](http://www.capital-analysis.com) or in the form of acceptance and execution of the order. Without providing personal data for these purposes, the Provider cannot provide access to the non-public content of the website or accept any order. Your personal data The provider, who is the administrator, processes the following: billing information, email, telephone and mailing address. These are necessary for performance of the contract, especially for sending access data to the application and website [www.capital-analysis.com](http://www.capital-analysis.com), supplying course materials or sending an online course or webinar.
- **bookkeeping:** If you are a customer, we urgently need your personal information (billing information) to comply with the legal obligations to issue and record tax documents.
- **marketing, business, statistical.** The User must consent to the processing of personal data for these purposes. With the consent for marketing and business purposes, the Provider will process the User's personal data primarily to create a suitable offer of products and services of the Provider
- or third parties and in connection with addressing the customer, by telephone, in writing, by all means of Internet advertising and in the form of electronic communication through contact information, and also to improve communication with Users with the aim of correct and functional system setup for all Service Users. All of these activities are essential to reaching customers with appropriate marketing offers.
- **advanced marketing (tied to consent):** It is only with your consent that the Provider can send you inspirational offers from third parties or use the provided email address, for example for

remarketing and for targeting advertising on social networks, for a period of 5 years from the consent. It can of course be revoked at any time by using our contact details.

- **video recording of seminars and photographic documentation:** At live seminars, meetings or training we take video recordings or photographic documentation. We use photos and videos in promotional materials, especially on the web. The video is for viewing. If you do not want to be on the record, please let us know in advance before the live event.
- We protect the personal data provided to the maximum extent possible by means of modern technologies corresponding to the level of technical development. We have taken and maintained all possible (currently known) technical and organizational measures to prevent the misuse, corruption or destruction of your personal data.
- Providing consent for marketing and other purposes is voluntary and may be revoked at any time by the User. This consent remains valid for the period of use of the Services and for the following 5 years thereafter or until the User withdraws it. If the User revokes his consent, this does not affect the processing of his / her personal data by the Provider for other purposes and based on other legal titles, in accordance with these principles of personal data processing.
- Personal data for the above mentioned purposes due to the fulfillment and legitimate interests of the Provider are processed to the extent necessary for the fulfillment of these purposes and for the time necessary to achieve them or for a period directly determined by legal regulations. The personal data are then deleted or anonymized.
- The Provider may process the collected personal data in the User Database for a period of 5 years from the date of termination of the last contract with the Provider.
- In the case of negotiations between the Provider and a potential User or interested in offered services, within the use of a service test period that was not completed by the conclusion of the contract, the Provider is entitled to process the provided personal data for 4 years from the first communication with the User.
- Provider processes personal data manually and automatically. The Provider keeps records of all activities, both manual and automated, in which personal data is processed.

## ***9. Sending business messages.***

The registered entity acknowledges and agrees that the Provider will use personal data for marketing purposes, ie to maintain a database of users of the web interface and to offer goods and services and to send commercial communications by all electronic means, especially by electronic mail, for indefinite. A registered entity has the option of always refusing to send commercial communications using the link contained in the commercial communications. If the User is not interested in receiving this information, he / she may unsubscribe from his / her e-mail address from this subscription or, upon request, unsubscribe directly from the Provider.

## ***10. Information on the rights of data subjects.***

Any identifiable natural person as a personally identifiable entity shall have the following rights.

- 1. Right of access to personal data, which includes the right to obtain from the Administrator:**

- **confirmation** that it is processing personal data
- **information** on the purposes of the processing, the categories of personal data concerned, the recipients to whom the personal data have been or will be disclosed, the planned processing time, the existence of the right to request or object to the controller, the right to lodge a complaint with the supervisory authority, of all available information on the source of personal data, if not obtained from the data subject, the fact that automated decision-making, including profiling, of appropriate safeguards for data transfers outside the EU is taking place,
- **provided** that the rights and freedoms of others and the copy of personal data are not adversely affected.

The above information and communications requested by the User shall be provided by the Provider free of charge. The right to confirmation of personal data processing and information will be possible to exercise by e-mail to the Provider's e-mail address.

- 2. Right to correct inaccurate data.** The data subject (User) has the right to correct inaccurate personal data that the Operator will process about him. The user is also obliged to report changes in his personal data and to prove that such change has occurred.
- 3. Right of erasure.** The data subject (User) has the right to delete personal data concerning him, unless the Operator proves justified reasons for processing such personal data. The operator has mechanisms in place to ensure the deletion of personal data if they are no longer needed for the purpose for which they were processed. The User may exercise the right to delete personal data by e-mail to the Provider's e-mail address. The Provider shall delete the eventual cancellation without delay, but no later than one month from the receipt of the request by the User.
- 4. Right to Restrict Processing** until such time as the complaint is resolved, he / she has the right to restrict processing if he / she denies the accuracy of personal data, reasons for their processing or if he / she objects to their processing by e-mail to the Provider's email address. It will not be possible for the user to ensure access to the non-public content of the website [www.capital-analysis.com](http://www.capital-analysis.com) for the duration of the complaint.
- 5. Right to notify repair, deletion or restriction of processing.** The data subject has the right to be notified by the Operator in case of correction, deletion or restriction of the processing of personal data. If personal data is corrected or deleted, the Provider will inform individual recipients, except when this proves impossible or requires undue effort.
- 6. The right to portability of personal data.** The data subject shall have the right to transfer the data relating to him to the controller in a structured, commonly used and machine-readable format and to request the controller to transmit such data to another controller.

If the data subject provides us with personal data in connection with the provision of services or with the consent of the data subject and their processing is carried out automatically, the data subject has the right to obtain such data in a structured, commonly used and machine readable format. If technically feasible, the data may also be transferred to the designated administrator by the User, provided that the person acting on behalf of the respective administrator is duly identified and it is possible to authorize it. In the event that the exercise of this right could adversely affect the rights and freedoms of third parties, the User's request cannot be met.

7. **The right to object to the processing of personal data.** The data subject has the right to object to the processing of his personal data on the grounds of the legitimate interest of the controller. In the event that the controller fails to demonstrate that there is a valid legitimate reason for the processing that outweighs the interests or rights and freedoms of the data subject, the controller shall terminate the processing upon objection without undue delay. The objection can be raised by e-mail to the Provider's e-mail address.
8. **The right to withdraw consent to the processing of personal data.** The consent to the processing of personal data for marketing and business purposes effective from 25 May 2018 may be revoked at any time after that date. The appeal must be made by express, comprehensible and certain expression of will by e-mail to the Provider's e-mail address.
9. **Processing of cookies data.** The mode of collecting cookies about the User is activated with the consent of the User.

The Provider collects cookies for the purpose of providing the Service and activating it. Cookies can be prevented by setting up a web browser. However, enabling cookies is necessary to run the Service. The service cannot be fully activated when cookies are prevented.

#### **10. Automated individual decision making, including profiling**

The data subject shall have the right not to be the subject of any decision based solely on automated processing, including profiling, which would have legal effects or would be significantly affected by it in a similar way. The operator states that it does not make automated decision-making without the impact of human judgment with legal effects for data subjects.

#### **11. Right to apply to the Office for Personal Data Protection**

The data subject has the right to contact the Office for Personal Data Protection (<https://www.uoou.cz/>).

#### ***11. User's consent to the processing of personal data.***

By agreeing to these terms and conditions, the registered entity, in accordance with the Personal Data Protection Act, grants consent to the processing of personal data provided during registration or placing an order on the Web Interface [www.capital-analysis.com](http://www.capital-analysis.com) in order to identify the registered entity when using the Web Interface. The User grants consent to the Operator by submitting a completed registration or other web form at [www.capital-analysis.com](http://www.capital-analysis.com). Filling in and submitting the form is a free will of the User.

#### ***12. Registered entity (User)***

grants the above consent to the processing of personal data on the Web Interface for an indefinite period of time. Personal data may be retained by the Operator even after the termination of the provision of services and / or after the termination of the user account of the registered subject, in order to facilitate later re-registration or sending commercial messages.

### **13. Processor**

The Provider as a controller is authorized to authorize a third party as a personal data processor in accordance with the Personal Data Protection Act.

### **14. Withdrawal of consent.**

The consent of the registered entity to the processing of personal data under these conditions is voluntary. The registered entity is entitled to withdraw this consent in writing at any time after opening the user account by sending an email to the Operator's email address. Upon revocation of the consent, the Operator shall ensure that all data of the registered entity is destroyed from the databases of the Operator and from the user account of the registered entity, while ensuring that such data are not further processed or disseminated for the further provision of services. Please note that if the consent to the processing of personal data is revoked, the web interface will be partially or completely unavailable to the extent that the processing of personal data is necessary to use this interface.

### **15. Registered entity's access to data.**

The registered entity has the right to ask the Operator for information on the processing of his / her personal data at any time from the opening of the user account. In such a case, the Operator shall provide the registered entity with information to the extent stipulated by the Personal Data Protection Act. If the registered entity (User) considers that the Operator is processing his / her personal data in violation of the Personal Data Protection Act, he / she has the right to ask the Operator (or the processor) for explanation or to require the Operator (or the processor) to remedy the situation. This may include blocking, correcting, supplementing or destroying personal data. The registered entity is also entitled to address its complaint to the Office for Personal Data Protection.

### **16. Provision and transfer of personal data to third parties.**

The registered entity acknowledges that the Operator may be obliged to provide personal data on the basis of the law or in order to fulfill its legal obligations (eg in judicial or administrative proceedings). Your personal information is accessed by company employees and, exceptionally, other collaborators. To ensure selected processing operations that we cannot provide ourselves, the Processor uses the services or applications of processors who can better secure your personal data. These include:

Facebook

Twitter

Instagram

Google - Google Analytics

mPohoda - accounting program

GOPAY s.r.o. - payment gateway

onebit.cz - webhosting

SMARTSELLING - Smartemailing, Mioweb, FAPI

Studio.illusion-pictures.cz - email server

## ***17. Statistical data***

The registered entity agrees with the anonymous use and / or publication of the registration and statistical data to the Operator for the development and operation of the Web Interface. The statistical data and their reports shall not contain personal data of a nature which could directly or indirectly identify the registered entity on the basis of one or more of these data or which would allow any third party to contact the registered entity.

## ***18. Declaration***

We declare that, as the administrator of your personal information, Obchodni Systemy s.r.o. As the operator of the website [www.capital-analysis.com](http://www.capital-analysis.com), it complies with all legal obligations required by the legislation in force, in particular the Personal Data Protection Act and GDPR, and that:

- process your personal data only on the basis of a valid legal reason, in particular a legitimate interest, performance of the contract, legal obligation or consent given;
- fulfills the obligation to provide information pursuant to Article 13 of the GDPR prior to the processing of personal data,
- Enable and support you in the exercise and fulfillment of your rights under the Data Protection Act and GDPR.

## ***19. Cookies***

In order to personalize the content of the website and to analyze its visit rate, the Operator uses cookies that are necessary for more efficient use of its website and proper display of the website. Above all, however, they help him with the analysis and continuous improvement of his services. Cookies are small text files that websites or sometimes email messages place on your computer. Cookies provide the operator with helpful information. For you as a user, this means that you can use the site efficiently, for example, without having to sign in every time. Cookies will also ensure that relevant information is provided to you.

- **The Operator uses two types of cookies on the website [www.capital-analysis.com](http://www.capital-analysis.com):**
- - Session cookies, which are deleted after each visit to the Operator's website.
- - Persistent cookies stored after several visits to the Operator's website