

Privacy Policy of the company Lufberg s.r.o.

I. Introductory provisions

1) The following is understood for purpose of this Policy:

- Operator: Lufberg s.r.o., Company ID: 28779690, registered seat Pernerova 780, 565 01 Choceň
- Personal data: name and surname, trade name, e-mail address, telephone number, billing address, delivery address, IP address, cookies, identification number of the natural person developing business and tax identification number of the natural person developing business

2) Operator of the websites www.lufberg.eu (www.lufberg.cz, www.lufberg.ru, www.lufberg.de, www.lufberg.pl, www.lufberg.com), being the Personal data Administrator, hereby informs about the method and scope of Personal Data processing, incl. the scope of the rights of the Participant (as defined below) related to processing of his Personal Data.

3) When processing Personal Data, the Operator shall proceed in conformity with the following legal regulations

- Personal Data Protection Act No. 101/2000 Sb.,
- Regulation of the European Parliament and of the Council (EU) 2016/679 (hereinafter referred to as the "Regulation")
- Act No. 480/2002 Sb. on Certain Information Society Services
- Act No. 563/1991 Sb., on Accountancy, as amended, Act No. 89/2012 Sb., the Civil Code, Act No. 634/1992 Sb., on Consumer Protection and/or in conformity with other legal regulations

4) Participant is the natural person, developing and not developing business that purchases goods and services from the Operator

5) Operator is the legal entity operating these sites for purpose of selling goods to the end customer. In connection with the facts above, the Personal Data are processed:

- within the extent the data have been provided in connection with ordering Operator's products or services and/or during negotiations concerning execution of a contract with the Operator, as well as in connection with the executed contract;
- for the purpose(s) listed below in Article II.

II. Purposes and times of Personal Data processing

1. The Operator processes Personal Data for the following purposes:

a) Fulfilment of a contract and/or another commitment and provision of services:

i. Personal data will be processed during the negotiations concerning execution of a contract between the Operator and the Participant, namely for purpose of execution of the contract as well as for the whole term of the contractual relationship.

ii. Sending satisfaction questionnaires: sending satisfaction questionnaires to improve the services provided to the customers following from the created order, reservation or direct sale. The period of Personal Data processing is 3 years in this case

b. Fulfilment of the legal obligation (in particular accounting, tax and archiving, granting assistance to administrative authorities, police, courts, etc.);

i. The tax document will be archived for 10 years after completion of the contract: For purpose of fulfilling the statutory obligation to archive the accounting documents, based on the Act No. 563/1991 Sb., on Accountancy, as amended, the Personal Data will be further processed and archived for the time period of 10 years, starting from the year following after the year, in the course of which the contract between the Operator and the Participant was executed.

ii. Fulfilment of the obligations connected with exercising the rights following from defective performance, granting assistance to administrative authorities, police, courts: The operator is authorized to process basic personal, identification and contact details of the customer, the data concerning the goods and the communication data with the customer for the period of 4 years from the moment of expiry of the warranty period for the goods.

c. Legitimate interests of the Operator, protection of Operator's rights and interests protected by the law:

i. Effective defence in case of a dispute. The time period of processing is set here to 4 years from expiry of the warranty period for the goods, and is extended for the time period, which the dispute is conducted for.

ii. Under the legitimate interest of the Operator we shall also understand sending/ mailing the business messages (collective offers and individual offers) in accordance with sec. 7 (3) of Act No. 480/2004 Sb., on Certain Information Society Services and in accordance with clause 47 of the Regulation, if the Operator obtained the details of electronic contact in connection with the sale of goods and services to the Participant.

d. Marketing and business offers of Operator's services;

i. Individual offer: sending / mailing advertising notices after assessment of certain personal aspects relating to a natural person. The operator does not perform profiling in accordance with article 22 of the Regulation, as it is not automated processing, but manual creation of individual offers. Time period of Personal Data processing is 3 years in this case.

ii. Sending / mailing business communications by third parties: sending/ mailing business notices by other administrators who personal details of the Participants were handed over to, based on the consent of the Participant and the Personal Data Processing Agreement. We are speaking about the transport services Direct Parcel Distribution CZ s. r. o. , Geis Parcel CZ s.r.o. , Česká pošta a.s, PPL CZ s.r.o., DHL CZ s.r.o, TOP Trans s.r.o.

iii Cookies: short text files generated by a web server and stored in the computer through a browser. Two types are distinguished. The first type: these cookies are necessary to ensure web functioning and analysis (transfer of electronic communications through the electronic communications network – use of these cookies cannot be a disagreed). The second type: these cookies assess some personal aspects relating to a particular individual. The Participant must express his approval with use of the second type of cookies. Time period of processing is 3 years in this case.

i) For re-marketing purposes, the cookies are transferred to other processors only if they express their approval for this purpose, with 1095 days as the max. term of expiry. If approval with ad cookies was withdrawn, it is not technically possible to remove the

cookies once released to the processor immediately. The cookies will be withdrawn from the processor automatically after expiry of the relevant term of expiry. Immediate solution to prevent re-marketing activities by the processor is to delete cookies from the browser.

2. Operator is the Personal Data Administrator.

III. Personal Data protection and information about processing

1. If the Participant fails to provide his/her Personal Data, it is not possible to conclude a contract with the Operator and/or to provide the related services by the Operator. Personal Data are necessary in this context for providing a specific service or product by the Operator.

2. After expiry of the terms referred to in Article II, the Operator deletes or anonymizes the Personal Data.

3. The Participant is required to provide the Operator with true and accurate Personal Data. The Participant is responsible for correctness, accuracy and truthfulness of the released Personal Data. The Operator is not responsible for accuracy of the provided data.

4. The Operator exerts every effort to avoid the unauthorized Personal Data processing.

5. The Operator is entitled to handover Personal Data of the Participant to the third parties for the following purposes: completion of the process of ordering, delivery of goods, sending/ mailing business messages, assessment of customer satisfaction, customer support services, registration of a new customer.

6. Personal Data are and will be processed in electronic form by a non-automated method.

IV. Rights of the Participant related to Personal Data processing

1) Rights of the Participant related to Personal Data protection:

- a) Ask the Operator for access to his/her Personal Data;
- b) Correct the released Personal Data;
- c) Delete the released Personal Data;
- d) Restrict Personal Data processing;
- e) Lodge a complaint with the Office for Personal Data Protection;
- f) Right to transfer Personal Data to another Administrator;
- g) Right to lodge an objection Personal Data processing.

2) The Participant may apply his/her rights under par. 1 of this Article at the address info@lufberg.eu

3) The rights under par. 1 of this Article, (c) and (d), cannot be applied within the extent and for the purposes referred to in Article II (1) (a), (b) and (c), with the exception of point (ii) (c) of Article II, where all the rights referred to in par. 1 may be exercised.

4) Should the Participant consider that the Operator performs his/her Personal Data processing contrary to protection of his/her private and personal life or in violation of the relevant legal regulations, especially if the Personal Data are inaccurate with respect to the purpose of processing, the former can:

- a) Ask the Operator for explanation, by e-mail to the address info@lufberg.eu
 - b) Lodge an objection against processing and ask the Operator by e-mail - mailed to the address info@lufberg.eu - to ensure elimination of the arisen state (e.g. by blocking, correcting, completing or deleting the relevant Personal Data). The Operator will decide the objection immediately and inform the Participant. Should the Operator fail to satisfy the objection, the Participant has the right to address the Office for Personal Data Protection. The Participant's right to address the Office for Personal Data Protection directly is not affected anyhow by this provision.
- 5) If the Participant exercises the right under this Article, the Operator is obliged to respond within 30 days of receipt of the Participant's request by the Operator.
 - 6) Application for exercising the right from Article IV, item 1 a) and f) can be accepted only through a data message or a letter with the officially authenticated signature sent/mailed to the address of the registered seat of the company. The application must contain the e-mail address, to which a verification email will be sent afterwards, to confirm identity of the applicant.
 - 7) If the Participant exercises any of the rights from Article IV, par. 1, the Operator has the right to request proof of the Participant's identity. The request for access to the Personal Data must therefore be sent from the applicant's e-mail address. If the request is raised in a different form or from another e-mail address, the Operator is entitled to request additional verification by replying to the verification email. If the applicant fails to prove his identity within 14 days from sending the verification email, his application for exercising the rights under Article IV, par. 1 will not be accepted.
 - 8) The Operator is entitled, in case of repeated and unjustified request to provide physical copy of the processed Personal Data, to charge a reasonable fee for the relevant related administrative costs.

V. Final provisions

- 1) All legal relationships arising in connection with Personal Data processing are governed by the legislation of the Czech Republic, irrespective of wherefrom the access to them has been realized. The relevant Czech courts are competent to resolve possible disputes arisen in connection with protection of privacy between the Participant and the Operator.
- 2) The data subject is entitled to address the Office for Personal Data Protection (www.uoou.cz).
- 3) This Privacy Policy becomes effective on 25.05. 2018.