

Privacy Policy

Last update effective as of: 2 Feb 2023

Who are we and how can you contact us?

In the context of your use of our Termino Portal booking service (“**Termino Portal**”, “**Termino**”) on the basis of the contract concluded between you and our company, we, i.e. Slevomat.cz, s.r.o., Company ID No.: 24698059, with our registered office at Pernerova 691/42, 186 00 Prague 8 - Karlín, incorporated in the Commercial Register maintained by the Municipal Court in Prague under File No. 166961 (hereinafter also referred to as “Slevomat”), are the controller of your personal data. A data controller is a party who determines the purposes and means of processing; in simple terms, the party that decides why and how personal data are processed.

Below are our contact details in case you do not find answers to your questions or do not understand any of the information in this document.

E-mail: podpora@slevomat.cz

Phone: +420 222 745 354 (Mon-Sun 8:00-18:00)

Address: Pernerova 691/42, 186 00 Prague 8 – Karlín

What personal data do we process and how do we obtain them?

A. We obtain your personal data primarily from you:

When you register in the Termino user interface to use the Portal and thus create a user account with us

In order to create a user account, we will need your username and password that you choose to log in, your email address, identification number (Company ID No.), and your registered address.

When you log into the Termino user interface in order to use it

In order to verify your identity and enable you to use the functionalities of our booking portal, we will need your login details that you provided to us during registration, namely, your username and password.

When using Termino

Some information may be collected passively when using Termino. This includes, in particular, the IP address, browser type, and operating system type. We also use cookies and navigation data to collect information on the date and time of your visit and information about your account.

When making a payment for using Termino

In order for you to make a payment for using Termino, we will need your contact details, namely, your name and email. We will also need information about how you will make the payment.

When communicating with you

We obtain your personal data when you communicate with us – be it by email, telephone, chat on our website or regular mail or communication on social networks or by other electronic means of communication (in particular: WhatsApp, Viber, FB Messenger, etc.) (this mainly includes your name, username, and contact details).

Information you provide about other persons

Before you provide us third-party personal data (e.g. name or phone number) as part of your use of Termino, make sure that such a third party agrees to, and can provide their personal data to us. You should also make sure that such a party understands how their personal data will be processed by us.

B. In some cases, we obtain your personal data from third parties.

We also obtain personal data **from public sources**, in particular, from social networks and the internet, and through **our own activities**, primarily by evaluating and analysing your personal data obtained from other sources, i.e. those mentioned above.

For what purposes do we process your personal data?

Access to Termino functionalities

At Slevomat, we process your personal data for the purposes of registration and login to the Termino user interface in connection with the performance of our contractual obligation to enable you to use the Termino functionalities. Registration in the Termino user interface is necessary to manage the bookings and for further use of the Termino services by interacting with the user interface. We are unable to grant you access to the Termino functionalities unless we are provided the above-mentioned personal data needed for registration in the user interface. For the above purposes, we process personal data on the basis of compliance with the contract.

Administration and improvement of Termino functionalities

We also use your personal data to administer, improve and develop Termino, including by analysing your data. In order to improve our services and for training purposes, we also use phone calls with our customer service line. Please note that your call may be recorded when communicating with our customer service line. At the beginning of the call, you will be informed that the call may be recorded and by continuing the phone call after being so advised you give your consent to the recording. For the above purposes, we process your personal data on the basis of legitimate interest.

Feedback and important changes in the Termino operations

We also use your personal data to obtain feedback from you on the functioning of Termino. From time to time, we will also notify you about important changes regarding Termino operations. For the above purposes, we process personal data on the legal basis of legitimate interest.

Processing on the basis of consent

In some instances, we process your personal data on the basis of your consent – the purpose and other information regarding such processing are always stated in the notice that we provide to you when we request such consent.

Period for which we process and retain your personal data

We only process and retain your personal data for as long as necessary for the purposes stated above or as long as necessary for compliance with the law. After this period, we erase or anonymise your personal data. If we process your personal data on the basis of legitimate interest, their processing lasts as long as our legitimate interest exists. You may object to the processing of your personal data on the basis of legitimate interest at any time.

Who do we disclose your personal data to?

We share your personal data with the following recipients:

- our suppliers, in particular, the contractors of IT, hosting, and marketing services, the providers of statistical, database and other software tools, and with other potential entities that may provide their services to us. Where required by the law, we may be obliged to share your personal data with third parties (e.g. law enforcement authorities, etc.) without your consent under certain circumstances. This is our legal obligation.

Cookies and retargeting

Our website uses cookies, i.e. small text files placed in your computer when you load the Slevomat website. Through cookies, we can identify the way you interact with the content of the website and thus personalise our communication with you. Consent to the storage of cookies is voluntary. You can block some or all cookies and delete those that have already been set. For detailed information about cookies and how to block them in various browsers, see www.aboutcookies.org or the website of the individual browsers. Please note, however, that if you block or delete the cookies sent by our website that are strictly necessary or ensure functionality and performance, you may not be able to use our website.

Our website uses retargeting technologies provided by external advertising systems. This allows us to use cookies to show our targeted advertising on various advertising networks to the visitors to our website who have shown interest in our services. You can opt out of targeted advertising, for example, by following these links: <https://www.imedia.cz>, <https://adssettings.google.com>, and <https://www.criteo.com/privacy/>.

How do we process your personal data and how are they safeguarded?

Personal data are processed manually and automatically in electronic information systems in electronic or paper form. Your personal data are primarily processed by our employees and processors. We have taken appropriate organisational and security measures to protect your personal data against accidental loss, destruction, abuse, damage, and unauthorised or unlawful access. We have concluded contracts with processors who process your personal data for us as the controller to ensure that your personal data are adequately protected. The employees and processors who participate in the processing of your personal data are bound by confidentiality. All the personal data that we process about you are stored on our company's servers located in the Czech Republic and other EU Member States.

What are your data protection rights?

At any time during the processing of your personal data, you may exercise the following rights:

- Right to access.** You have the right to obtain confirmation as to whether or not we process your personal data and what data, if any, we process, including the right to obtain copies of the personal data we process about you. Please note that it will not be possible to disclose such information as would compromise our trade secrets or third-party rights.
- Right to rectification and right to have data completed.** If you find that the personal data that we process about you are inaccurate or incomplete, you have the right to request that we rectify and update such data.
- Right to erasure.** In some cases, you have the right to request that we erase all the personal data we process about you. Please note that the erasure of personal data is not always possible, in particular, if they are processed for a legitimate purpose and in accordance with data protection laws and regulations.

- d) **Right to restriction of processing.** In some cases, e.g. when you question the accuracy, lawfulness or our need to process your personal data, you have the right to request that we restrict the processing of your personal data. If we comply with your request, we will restrict the processing of your personal data to a strict minimum (and we will generally no longer continue to process the data). We will record in our systems that the data are subject to a restriction. If the restriction is removed and we intend to continue processing your personal data, we will inform you accordingly in advance.
- e) **Right to data portability.** You have the right to request that we transmit (in a commonly used machine-readable format) the data that you provided to us and that we process to a third party (another data controller) that you specify in your request. Please note that you may exercise this right only if we process your personal data on the basis of your consent or for the purpose of performance of a contract and, at the same time, the processing is automated.
- f) **Right to lodge a complaint with a supervisory authority.** If you consider that the obligations under data protection legislation have been infringed, you have the right to lodge a complaint with the Personal Data Protection Authority or with another supervisory authority of an EU Member State in charge of the monitoring of compliance with data protection legislation. We care about you and would appreciate it if you could contact us and give us the opportunity to resolve the matter directly with you before you decide to lodge a complaint.

Right to object

In addition to the above rights, you also have the right to object to the processing of your personal data. You may object if the data are processed on the basis of the legitimate interest of the controller or a third party (or if the processing is on the basis of performance of a task carried out in the public interest or in the exercise of official authority).

If you object to the processing, we will not process your personal data until we have demonstrated compelling legitimate grounds for the processing that override your interests, rights and freedoms.

How can you exercise your rights?

If you decide to exercise any of the above rights, please send us a message using the email or postal address specified above. Please note that if you exercise your right, we need to be certain of your identity. Therefore, we may need to ask you to provide proof of identity in some cases. If any of the above rights is exercised, we will inform you in writing without undue delay about how your request will be handled.

Changes in the Privacy Policy

We may amend or update this Privacy Policy in the future. If we make any changes, you will see this, among other things, as an updated date of the last revision in the header of this Policy. If we make any changes that may have a significant impact on your privacy, we will also notify you in other appropriate ways (e.g. by email or a notice posted in the interface of our services). We recommend that you read the Privacy Policy regularly to remain informed about how we process your personal data and how you can protect your privacy.