



Personal data protection policy

We at TALKEY a.s., company number: 091 01 942 (“**we**”) pay great attention to personal data protection. In this document, you will find out which personal data we process, in particular about our customers and the users of our website, whether we process them on the basis of a consent or on any other legitimate basis, the purposes for which we use them, the parties to which we can transfer them and what your rights are in relation to the processing of your personal data.

1. Which personal data we process

When you are using TALKEY, we do not collect or record any data about the use of the product. When you are browsing our website, we follow from what device you are accessing it and what you are interested in. When you make a purchase we also work with your personal data.

We process the following personal data:

Identification data, which means mainly your name and surname, and if you are a legal entity, your company name, company number, tax identification number or VAT number;

contact details, which means personal data that enable us to contact you, such as your e-mail address, phone number, postal address, billing address and your social media contact details;

information about your orders, means, without limitation, the number of licenses that you have ordered, payments including the payment account number and information about any queries and complaints;

data about your online behaviour, including, without limitation, the links you click on, the way you move and scroll around our website as well as data about the device from which you view our website, such as the IP address and derived location, identification of the device, its technical parameters such as the operating system and its version, screen resolution, used browser and its version, as well as data obtained from cookies and similar device identification technologies;

data about your behaviour when reading messages that we send you, including, without limitation, the times at which you open messages as well as data about the device on which you read them, such as the IP address and derived location, identification of the device, its technical parameters such as the operating system and its version, screen resolution, used browser and its version;

derived data, which means personal data derived from your online behaviour and data about your behaviour when reading emails that we send you; this means, without limitation, information about your age, financial situation, shopping behaviour and relationship to various goods and services;

data related to the use of the call centre, including, without limitation, records of telephone calls with the call centre, identification of messages that you send us, including identifiers such as IP addresses.

2. Why we process your personal data and on what basis

We process personal data for various purposes in various situations. When you use our website, on which we also use cookies, we use your data primarily to track traffic and to improve our services. If you buy something from us, we use your data to handle your order, protect our legitimate interests and meet our legal obligations. We also display and send you personalised offers based on your contacts and other information. If you consent, we transfer data to third parties to display offers on other websites. We are allowed to process your personal data on the basis



of preparing or performing a contract with you, complying with legal obligations, protecting our legitimate interests or on the basis of your consent.

As part of our activity, we process personal data for various purposes and to various extents:

1. either without your consent on the basis of the performance of a contract, our legitimate interest or to comply with a legal obligation, or
2. on the basis of your consent.

The kinds of processing that we may carry out without your consent depend on the purposes of such processing and on the relationship between us – whether you are a mere visitor of our website or whether you are making a purchase. We can also process your personal data if you are the recipient of goods or services ordered from us or if you communicate with us.

A/ When you visit our website

Use of cookies and other technologies, transfer of data to advertising networks and social media.

If you visit our website, we will store small files, such as cookies, on your device and read them subsequently. A cookie is a small file of letters and numbers that we store in your web browser or on the hard disk of your computer. Some cookies enable us to interconnect your activities during browsing on our website from the moment you open the web browser window until the moment you close it. The moment you close the web browser window, these cookies are deleted. Others stay on your device for a set time and are activated every time you visit the website that created these particular cookies. We also use web beacons, small graphic images that have a function similar to cookies. Unlike cookies which are stored on your computer's hard disk, web beacons are a part of the website. For the sake of simplicity, we will refer to all these technologies as cookies. We not only store cookies on your device but we also read the cookies that were stored on your device by our website. For convenience, we will only use the term storing further in this document.

Some cookies are stored on your device directly by our website. These cookies help us:

- identify you when browsing between individual pages of our website and upon your repeated visits in order to remember, for example, which version of our website we should show you if several versions are available at the given moment;
- record whether or not you have given us consent under this policy, or whether you offered to take part in a particular survey;
- ensure the security, e.g. to make sure that someone has not misused your login to our website and is not acting instead of you;
- record, analyse and troubleshoot defects and parts of our websites that are not working properly.

Such cookies and other files are necessary for the functioning of our website. If you block these cookies in your browser, our website may not work properly and we may not be able to provide you with our products and services.



We also:

- store cookies from our website on your device that enable us to:
 - monitor the traffic to our website and its individual pages, to create statistics and surveys and to measure the effectiveness of advertising;
 - show you various versions of our website as we test new functionalities;
 - personalise the content of our website, e.g. display other personalised offers for you on our website;
- allow third parties to store cookies and use them to:
 - collect data about your behaviour on our website and other websites;
 - show personalised offers and targeted ads through advertising networks and social media on websites other than our website;
 - to interconnect with social media such as Facebook, including the automatic login, providing functions such as the "Like" button or sending notifications related to a placed order via Messenger and displaying personalised offers and targeted ads on these social media and websites other than our website.

For the purpose of displaying personalised offers and targeted ads through advertising networks and social media on websites other than ours, we also transfer the information on your behaviour on our website to advertising networks and social media. We do not, however, transfer your identification data to such partners.

Use of cookies and other technologies, transfer of data to advertising networks and social media

If you visit the talkey.com website, we process **data about your behaviour on the website** on the basis of our legitimate interest (i.e. without your consent) for the following purposes:

- to obtain information based on which we will be able to improve the website for you in the future; our legitimate interest in this regard is to improve our services for you;
- to create statistics and surveys, including, without limitation, monitoring the traffic to our website and its individual pages and measuring the effectiveness of advertising; our legitimate interest in this regard is to measure the effectiveness of our website and expenditures on advertising; for this purpose, we can gather other **derived data** from your online behaviour and use the data for this purpose, or transfer pseudonymised data to our commission billing partners;
- to test new features and applications before deployment, in particular to avoid trouble with the functioning of such new features in commercial operations which may make your shopping experience with us less pleasant; our legitimate interest in this regard is to improve our services for you;
- to prevent attacks on our website and threats to its running and the security of your data; our legitimate interest in this regard is the seamless functioning of our services for you and the security of your data.

We do not obtain data on your behaviour on the website from cookies only. We complete them with the following information:

- the IP address of your device (the address of your device through which you communicate with other devices on the Internet);
- the operating system of your device, its version and language settings;



- the browser you use on your device, its version and language settings;
- the address of the website (URL address) from which you came to our website.

We use personal data for these purposes for a period of 38 months at most. During that time, we only store pseudonymised data. You have the right to object to this type of processing.

B/ When you make a purchase

For you to buy anything from us, you need to visit our website and thus the types of processing described in the section “When you visit our website” above are relevant to you. If you make a purchase we will also carry out the following processing:

Processing on the basis of the performance of a contract

If you make a purchase from us as a natural person (an individual), we process your **identification and contact details** and **information about your orders** in order to **process your order**.

If you make a purchase from us on behalf of a legal entity (a business), we process the same data for the same purpose on the **basis of our legitimate interest** to enter into and to perform a contract with the entity that you are representing.

Using these data to process your order means, in particular, using them:

- so that you can complete your order on the website;
- so that we can communicate with you about the order, e.g. send you a confirmation or inform you that the product has been sent to you;
- in order for you to pay for the product; in this regard, we may also transfer your data to our partners operating the payment systems as described in the section “Who processes your personal data and to whom do we transfer your data?”;
- in connection with a complaint about a product ordered;
- in connection with your other request that you address to us in writing or electronically, as described in the section “When you communicate with us via multiple channels”.

We process personal data for this purpose throughout the time necessary to process your order or to handle the respective request under the contract such as handling a complaint.

Processing on the basis of a legitimate interest

When you make a purchase from us, we store your **identification and contact details and information about your orders** on the basis of our legitimate interest (without your consent) for the purposes of legal claims and our internal record-keeping and checks. Our legitimate interests in this regard are the protection of legal claims and control over the proper provision of our services.

We also process your **identification and contact details, your settings, and information about your orders** on the basis of our legitimate interest (without your consent) for the following purposes:

- to obtain information based on which we will be able to improve our services for you in the future in order to offer you an even better shopping experience next time, in particular to find out about your satisfaction with our services; our legitimate interest in this regard is to improve our services for you, and
- to tailor the functions of our website to your needs; for this purpose, we also process **your IP address and the location derived from it**,
- to **deliver** personalised offers and targeted ads to you by e-mail, text message, via social media, over the phone or by other electronic means or by postal mail; our legitimate interest in this regard is to effectively promote our products and services. In order to be able to tailor an offer for you, we analyse the above data (i.e. your identification and contact details and information about your orders) and gather further, **derived data**, that we use for this purpose. Based on these data, we categorise our users in groups and send group-specific offers to them.

We process data for the purposes of protecting our legal claims, keeping internal records and for control purposes for the duration of the three-year limitation period, plus one year after its expiry having regard to claims that may be raised at the end of the limitation period. If judicial, administrative or other proceedings are initiated, we process your personal data to the necessary extent throughout the duration of such proceedings and the remaining part of the limitation period after the end of such proceedings.

We use personal data for the other stated purposes for a period of no more than six months.

You have the right to object to processing carried out on the basis of our legitimate interest.

Processing to comply with a legal obligation

We must comply with some statutory obligations too. We do not need your consent to process your personal data on this particular basis. We process your **identification and contact details and information about orders** on this lawful basis, in order to comply, in particular, with the following laws:

- Act No 89/2012, the Civil Code,
- Act No 634/1992 on consumer protection,
- Act No 235/2004 on value added tax,
- Act No 563/1991 on accounting.

We use the personal data for these purposes for a period of no more than 10 years from the issue of the last document relating to your order.

C/ If you are the recipient of goods or services ordered from us

If you are the recipient of goods or services that have been ordered from us, we process your **identification and contact details**:

- on the basis of our legitimate interest in order to prepare, enter into and perform the contract with our customer. Complying with the contract is also our legitimate interest;
- on the basis of our legitimate interest to obtain information based on which we will be able to improve our services in the future, or information for generating our internal statistics and overviews; our legitimate interest in this regard is to continuously improve our services for our customers;
- to comply with legal obligations, in particular under Act No 235/2004 on value added tax, and Act No 563/1991 on accounting;



- to protect legal claims and to keep our internal records and for control purposes; our legitimate interests in this regard are the protection of legal claims and control over the proper provision of our services.

We use personal data to prepare, enter into and perform contracts with our customers for the time necessary to process an order. After the expiry of that period, we retain data on the basis of our legitimate interest to protect legal claims and for our internal record-keeping and control for the duration of a three-year limitation period, plus one year after its expiry having regard to claims that may be raised at the end of the limitation period. If judicial, administrative or other proceedings are initiated, we process your personal data to the necessary extent throughout the duration of such proceedings and the remaining part of the limitation period after the end of such proceedings. Our legitimate interests in this regard are the protection of legal claims and control over the proper provision of our services. We use personal data to comply with legal obligations for a period of no more than 10 years relating to the respective order.

You have the right to object to processing carried out to comply with a legal obligation.

D/ When you communicate with us via multiple channels:

When you communicate with us via multiple channels, including, without limitation, the phone, email, chatting tools and social media, we will process your **identification and contact details and records of past conversations** on the basis of our legitimate interest (i.e. without your consent) for the following purposes:

- to handle your requests; if you have made a purchase from us and your request is related to an order we may process your data to perform the contract with you;
- to record your requests so we can make sure that we are meeting them duly and in time;
- to prove that we have received and processed your request, e.g. when you order goods or make a complaint via such a channel;
- to analyse such channels in order to improve the quality of our services.

We store personal data for three months for these purposes. If you place an order via any of these channels we may store the data to protect legal claims for the duration of a three-year limitation period, plus one year after its expiry having regard to claims that may be raised at the end of the limitation period. If judicial, administrative or other proceedings are initiated, we process your personal data to the necessary extent throughout the duration of such proceedings and the remaining part of the limitation period after the end of such proceedings.

You have the right to object to processing carried out on the basis of our legitimate interest.

3. Who processes your personal data and to whom do we transfer it?

In most cases we process your data for our own purposes as a controller. In such a case, we transfer your data to our partners to arrange for payments and other matters related to your order. We also transfer data to processors who process data in compliance with our instructions. Subject to your consent, we may also transfer your data to advertising networks and social media in order to display personalised ads on other websites and to our partners.

We process all the above personal data as a **controller**. That means that we determine the above purposes for which we collect your personal data, determine the means of processing and are responsible for it being carried out properly.



We may also transfer your personal data to third parties who are **controllers**, i.e.:

- a) in connection with the handling of your order, to our partners who are involved in the processing as described in the section When you make a purchase, namely:
 - partners operating payment systems for making the payment, in particular in connection with a payment by card, in particular GOPAY s.r.o (company number: 26046768), having its registered office at 370 01, Planá 67
 - transportation partners, in particular DHL Express (Czech Republic) s.r.o., (company number: 25683446), having its registered office at Nádražní 2967/93, Moravská Ostrava, 702 00 Ostrava, PPL CZ s.r.o., (company number: 25194798), having its registered office at K Borovému 99, Jažlovice, 251 01 Říčany, if they are delivering your order;
 - our partners as part of partner sales, if any of these partners is delivering goods from your order, and solely for the purposes of delivering such goods and any complaints;
- b) on the basis of your consent to advertising networks and social media as described in the section “Use of cookies and other technologies”, we transfer data to advertising networks and social media, namely:
 - Google Ireland Limited (registered number: 368047), with its registered office at Gordon House, Barrow Street, Dublin 4, Ireland; the privacy policy of this company is available here: <https://policies.google.com/technologies/ads> , <https://policies.google.com/privacy>
 - Facebook Ireland Limited, with its registered office at 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, D02 X525, Ireland; the privacy policy of this company is available here: <https://cs-cz.facebook.com/about/privacy>

We also use the services of processors to process personal data. Processors only process personal data on our instructions and for the purposes described in the section “Why we process your personal data and on what basis?”. These **processors** are:

- ette capital a.s. group companies, TALKEY a.s. being one of them:
 - ClineX a.s., (company number: 04518951), with its registered office at Rybná 682/14, Staré Město, 110 00 Praha 1
 - CreditPortal, a.s., (company number: 05561302), with its registered office at Argentinská 286/38, Holešovice, 170 00 Praha 7
 - EMARU sp. Z o.o., (registration number: 630530894), with its registered office at Mickiewiczza 29, 40 085 Katowice
 - finette s.r.o., (company number: 07332823), with its registered office at Hrušovská 3203/13a, Moravská Ostrava, 702 00 Ostrava
 - For Plastic a.s., (company number: 06111017), with its registered office at Hrušovská 3203/13a, Moravská Ostrava, 702 00 Ostrava
 - holver s.r.o., (company number: 25860399), with its registered office at Hrušovská 3203/13a, Moravská Ostrava, 702 00 Ostrava
 - notos power a.s., (company number: 08072809), with its registered office at Hrušovská 3203/13a, Moravská Ostrava, 702 00 Ostrava
 - Plastic One a.s., (company number: 05992346), with its registered office at Lihovarská 1378/11, Radvanice, 716 00 Ostrava
 - Plastic Union a.s, (company number: 06186157), with its registered office at Hrušovská 3203/13a, Moravská Ostrava, 702 00 Ostrava
 - rockette s.r.o. , (company number: 05379776), with its registered office at Hrušovská 3203/13a, Moravská Ostrava, 702 00 Ostrava



- rossban a.s. ., (company number: 08677107), with its registered office at Janáčkova 3277/22A, Moravská Ostrava, 702 00 Ostrava
- sunette s.r.o. ., (company number: 25901001), with its registered office at Hrušovská 3203/13a, Moravská Ostrava, 702 00 Ostrava
- trayto a.s. ., (company number: 08677247), with its registered office at Janáčkova 3277/22A, Moravská Ostrava, 702 00 Ostrava
- providers of cloud services and other vendors of technology and support such as K2 connect solution s.r.o., with its registered office at Koksární 1097/7, 702 00 Ostrava - Přívoz
- providers of marketing tools such as FISTRO digital s.r.o., DVA MLUVČÍ s.r.o., ActiveCampaign, LLC., who help us optimise our website and personalise content and offers for you.

4. From what sources do we obtain personal data?

We usually obtain data directly from you via our website or when communicating with you. We may obtain some data from our partners, e.g. banks.

In most cases we process the personal data that you provide to us when ordering goods or services or when communicating with us, e.g. by phone or email. We also obtain your personal data directly from you by monitoring your behaviour on our website and while reading messages.

If you make a purchase from us we may receive additional information about your orders from banks, our partners operating payment systems, e.g. the information about your account number or about a successful payment, in connection with the performance of the purchase contract that we have entered into.

5. Transfer of data outside the EU

We may also transfer your personal data to countries which are not members of the European Economic Area.

While transferring data to our processors stated in the section “Who processes your personal data and to whom do we transfer it?”, we may also transfer your data to third countries outside the European Economic Area where the adequate level of personal data is not guaranteed. We will carry out any such transfer only if the processor undertakes to observe the standard contractual clauses laid down by the European Commission and available at <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32004D0915&from=EN>

6. What are your rights in relation to the processing of personal data?

You have many rights in relation to the processing of your personal rights. You have the right of access, right to rectification, to erasure, to restrict processing, to data portability and to object.

Just like we have rights and obligations related to the processing of your personal data, you also have certain rights in relation to the processing of your personal data. These rights include:



Right of access

You have the right to know what information about you we process, for what purpose, for how long, where we obtain your personal data, to whom we transfer the data, who else processes them and what other rights you have in relation to the processing of your personal data. You can find all this information in this Personal Data Protection Policy. However, if you are not sure which of your personal data we process, you may ask us to confirm whether we process personal data concerning you, and if we do, you have the right to access such personal data. As part of the right of access you may ask us to provide you with a copy of the personal data being processed. The first copy will be provided free of charge and further copies will cost CZK 2,000.

Right to rectification

To err is human. If you find out that your personal data that we process are inaccurate or incomplete, you have the right to obtain their rectification or completion from us without undue delay.

Right to erasure

In some cases, you have the right to obtain erasure of your personal data from us. We will erase your personal data without undue delay if any of the following occurs:

- we no longer need your personal data for the purposes for which we processed them;
- you withdraw your consent to the processing of your personal data for which your consent is required, and we do not have any other basis for processing such data;
- you use your right to object to the processing (see Right to object to processing below) of personal data that we have been processing on the basis of our legitimate interests and we conclude that we no longer have any such legitimate interests justifying such processing, or
- you believe that our processing of your personal data no longer complies with the generally binding legislation.

However, please do bear in mind that even if one of these reasons occurs, this does not mean that we erase all of your personal data immediately. This right will not apply where the processing of your personal data remains necessary for us to comply with our legal obligation or for the establishment, exercise or defence of our legal claims (see section "Why we process your personal data and on what basis").

Right to restrict processing

In some cases, you may use, apart from the right to erasure, the right to restrict the processing of your personal data. This right allows you to request, in certain cases, that your personal data is marked and that such data is not subject to any further processing operations – not forever (as in the case of the right of erasure) but for a limited time. We have to restrict the processing of your personal data when:

- you have challenged the accuracy of your personal data, until we agree on accurate data;
- we have been processing your personal data without a sufficient lawful basis (e.g. beyond a strictly necessary extent) but you prefer restriction rather than the erasure of such data (e.g. if you expect to provide such data to us in the future anyway);
- we no longer need personal data for the above purposes of processing but you request it for the establishment, exercise or defence of your legal claims, or



- you have objected to processing. The right to object to processing is described in detail in the chapter Right to object to processing).

While we are considering your objection to processing we must restrict the processing of your personal data.

Right to portability

You have the right to receive the personal data that concern you and that you have provided to us and that we have been processing on the basis of your consent and to perform a contract. We will provide the data to you in a structured commonly used and machine-readable format. So that we can easily transfer such data on your request, these must be data that we process in an automated manner in our electronic databases.

Right to object to processing

You have the right to object to the processing of personal data carried out on the basis of our legitimate interest (see section "Why we process your personal data and on what basis"). If you object to processing for marketing activities, we will automatically stop processing your data; in other cases, we will do so unless we have serious legitimate grounds for continuing to process the data.

Right to complain

The use of your rights in any of the manners described above will not affect your right to complain before the competent supervisory authority. You can use this right in particular if you believe that we have been processing your personal data without a legal basis or in breach of generally binding legislation. You may lodge a complaint against our processing of your personal data to Úřad pro ochranu osobních údajů [The Office for Personal Data Protection], with its registered address at Pplk. Sochora 27, 170 00 Praha 7.

7. How to use your rights and the contact details of the data controller

You can use any of your rights by contacting the controller. The controller did not appoint a Data Protection Officer, but did appoint a person who is responsible for and oversees the proper processing of your personal data.

- In person at the address Hrušovská 3203/13a, 702 00 Ostrava
- By mail sent to the address TALKEY a.s., Hrušovská 3203/13a, 702 00 Ostrava
- By email sent to the email address gdpr@talkey.com



Cookie Name/Issuer	Cookie type	Expiration	Visible to 3rd party?
CONSENT	technical	19 years	no
IDE	remarketing	1 year	DoubleClick (Google)
ANID	remarketing	1 year	Google
	Google uses these cookies based on recent searches and interactions and customizes ads on Google websites.		
NID, IP_JAR		1 day	Google
_fbp	tracking	3 months	facebook.com
_ga	traffic measurement and e-commerce	2 years	Google
_gat_gtag_UA_150673517_1	tracking	session	Google
_gid	tracking	1 day	Google
	Used by Facebook to send a range of advertising products, such as offers from third-party advertisers, in real time		
fr		unlimited	facebook.com
_hjIncludedInSample	tracking	session	Hotjar
_hjid	tracking	1 year	Hotjar