

Our Company GDPR & Cookies Policy

This GDPR and Cookies policy will explain how our organization uses the personal data we collect from you when you use our website and services.

The processing of personal data shall be governed in particular by REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) – hereinafter “GDPR” and Act No. 110/2019 Coll., On the processing of personal data, as amended

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Who processes your personal data?

Your personal information is managed by PayRose s.r.o. (hereinafter referred to as the “Controller” or “Company”), the company which is authorized by the National Bank of Czech Republic as Small Payment Institution in accordance with Act No. 284/2009 Coll. on Payment System.

Who can you contact if you have any questions regarding personal data processing?

If you have any questions about our Company's GDPR and/or Cookies Policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Contact details of the Controller:

PayRose s.r.o., Na Perštýně 342/1, 110 00 Prague, Czech Republic
ID No.: 07717261
e-mail: info@paybyrose.com

If You have any questions about this privacy policy, including requests to exercise your legal rights, please contact the DPO. Please use the below details:

DPO Contact details:

KOPEČNÝ & PARTNERS s.r.o., Stará 98/18, 602 00 Brno, Czech Republic, Mgr. Bc. Petra Juřátková, email: info@kopecnypartners.com.

Who is data subject?

Mainly:

- Customer
- Potential customer
- Site visitor (in relation to Cookies)

What data do we collect?

Our Company processes your personal data only for legal reasons, correctly and transparently. We collect your personal information for the intended purpose only. We keep this information securely for as long as is legally required.

If you are a customer our Company processes all personal data communicated to it by you in connection with the conclusion, duration and termination of the contract between you and us in any form, in particular the following personal data:

- name, surname, date of birth, birth number, permanent residence address, nationality, sex,
- in the case of self-employed persons - company, person's identification number, person's tax identification number, registered office / place of business,
- phone number, e-mail address, contact address (if different from permanent address),
- identity card number, including the validity of the identity card or other document, on the basis of which the identity of the Data Subject can be verified,
- a copy of the identity card,
- IP address, cookies
- the Data Subject's political exposure and other specific information required by the applicable legislation,
- source of income, form of business,
- Bank account, credit card and payment history numbers
- data on the property situation of the Data Subject
- other personal data necessary to assess the data subject's creditworthiness, credibility and payment discipline,
- records of communication with the Data Subject.

If you are just a potential customer our Company processes your personal data communicated to it by you in connection just with the conclusion of potential contract between you and us, in particular the following personal data:

- name, surname, date of birth, birth number
- phone number, e-mail address, contact address (if different from permanent address),

How do we collect your data?

You directly provide our Company with most of the data we collect. We collect data and process data when you:

- Register online or place an order for any of our products or services.
- Voluntarily complete a customer survey or provide feedback on any of our message boards or via email.
- Sign a contract with our Company.
- Use or view our website via your browser's cookies

Our Company is entitled to process personal data communicated in any way by you to us or communicated to the processor of our Company.

Our Company is also entitled to process the personal data necessary for the provision of services of the Data Subject to the extent of data obtained by our Company (or our processor) from publicly accessible sources or from third

parties in connection with the conclusion, duration and termination of the Agreement between the Data Subject and our Company, for example:

- Social media
- Sanction and PEP data lists
- Public Registers
- Third party information providers, for the purpose of verifying the information provided about you

Under what legal title do we process your personal data?

Your personal data are processed:

- with your consent to the processing of personal data,
- to perform contracts to which you are a party, or to take measures taken prior to the conclusion of the contract,
- in order to fulfill the legal obligations that apply to our Company, in particular the obligations arising from Act No. 253/2008 Coll., on certain measures against the legalization of proceeds from crime, as amended, and other related legal regulations,
- for the purposes of the legitimate interests of our Company or of a third party

Personal data can also be used as evidence.

Do we make copies of identity documents?

In accordance with Act No. 253/2008 Coll., on certain measures against the legalization of proceeds from crime and terrorist financing, as amended, our Company is entitled to process a personal identification number and to obtain, store and process copies of identity documents.

How will we use your data?

Our Company collects your data for following purposes:

- identification of the Data subject,
- verification of the Data Subject's personal data,
- consideration of the Data subject's request for the provision of a service by the Controller,
- Data Subject profiling,
- use of the Data Subject's personal data for the purpose of profiling the subsequent commercial offer,
- the development of a body of information on the creditworthiness, credibility and payment discipline of the Data Subject and allowing for a repeated assessment of the creditworthiness, credibility and payment discipline of the Data Subject,
- ensuring mutual information on the creditworthiness, credibility and payment discipline of the Data Subject and allowing (even repeated) assessment of the creditworthiness, credibility and payment discipline of the Data Subject
- fulfillment of agreement between our Company and the Data Subject,
- compliance with the statutory obligations of our Company or third parties,
- fraud prevention,
- customer support,
- protecting the legitimate interests of our Company or third parties,
- asserting legal rights and obligations under the contractual relationship between our Company and the Data subject,
- sending commercial messages.

Do we pass on personal data to third parties?

Based on the consent, in connection with the fulfillment of obligations stipulated by the relevant legal regulations or if it is necessary for the protection of the rights and legally protected our interests, our Company is entitled to transfer personal data to third parties.

The recipients of personal data include, in particular, the processors like:

- IT service providers,
- providers of file and archiving services,
- providers of significant activities (outsourcing),
- lawyers, notaries, executors,
- providers of printing and postal services, including couriers,
- and more.

Furthermore, the recipients of personal data include, in particular, credit registers and other administrators (providers), in particular banks and payment institutions.

Detailed specifications of processors and other recipients will be provided to you at your request.

Our Company would like to point out that we are not responsible for the processing of personal data by third parties who are in the position of the controller. In such processing of personal data, the personal data protection principles of this third party in the position of controller will be applied.

Our company will not transfer personal data to countries outside the European Union or to international organizations or bodies, unless you give your consent or are obliged to do so by law.

Do we process personal data using profiling or automated decision making?

Our Company processes personal data systematically and automatically, especially in the assessment of your creditworthiness, we use profiling, which means any form of automated processing of personal data consisting in their use to assess certain personal aspects relating to a natural person.

How do we store your data?

Our Company respects the relevant legal standards for IT security to ensure the security of data and systems and to monitor their compliance, we implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk.

How long we process data?

We process your personal data for various periods of time depending on the purpose of the processing. If the duration of the processing is not determined by the consent given by you, we process personal data only for the time necessary to fulfill the purpose of their processing or during the fulfillment of legal obligations.

Unless stipulated otherwise, your personal data shall be deleted by us no later than one month after the purpose, resp. the legal reason for their processing.

Personal data subject to the archiving obligation shall be processed for the period specified in the relevant legal regulations.

The statutory period for the retention of data and documents for the purpose of identification and fulfillment of other obligations stipulated by Act No. 253/2008 Coll., on certain measures against money laundering and terrorist financing, as amended, is 10 years following the end of the calendar year, in which the contractual relationship between you and our Company was terminated, even if the Data Subject's request to provide some of our service was rejected.

Personal data processed with your consent shall be deleted in response to a written request from you, at the latest within one month of receipt of such a request. Previous processing of personal data is not affected. Revocation of consent shall not prevent our Company from further processing personal data for any other legal reason.

You may revoke a previously granted consent to the processing of personal data at any time via the e-mail address info@paybyrose.com.

Do we process data for marketing purposes?

Our Company would like to send you information about products and services of ours that we think you might like. For some of our products, we utilize the services of third parties which might require us to share information related

to you with them so we may provide you with the services and products presented in our website. All our providers and service partners are under the same GDPR mandatory requirements for safeguarding your information.

If you have agreed to receive marketing, you may always opt out at a later date.

You have the right at any time to stop our Company from contacting you for marketing purposes or giving your data to third parties related to products provided by our Company.

If you no longer wish to be contacted for marketing purposes, please send us an email to info@paybyrose.com and we will process your request immediately.

What are your data protection rights?

Our Company would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

- request our Company for access to personal data processed by us,
- ask our Company for a copy of your personal data,
- request our Company to confirm the personal data processed, in particular the purpose of the processing, the category of personal data concerned, the recipient or categories of recipients, the processing / storage time of personal data, information on personal data sources, automated decision making, including profiling,
- ask our Company for repair, resp. completion of inaccuracies,
- request our Company to delete personal data processed by us, if they are no longer needed for the provided purpose, or if they are processed illegally by us,
- request our Company to restrict the processing of your personal data in the cases provided for in Article 18 of the GDPR,
- the portability of your personal data,
- to raise an objection pursuant to Article 21 of the GDPR.

If you believe that our Company is processing personal data in violation of your rights or law, you may:

- ask our Company for an explanation,
- demand the removal of the illegal situation,
- lodge a complaint with the supervisory authority, which is the Office for Personal Data Protection.

If you make a request, we have up to 30 days to respond to you. If you would like to exercise any of these rights, please contact us:

Or write to us: info@paybyrose.com

Please note that most of the information we gather is part of our statutory obligation, and if you choose to refuse to share certain information with our Company, it might cause the termination of our services to you.

What are cookies?

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

For further information visit allaboutcookies.org.

How do we use cookies?

Our Company uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in
- Understanding how you use our website
- In conjunction with Google Analytics
- Securing transactions with CSRF tokens
- Securing transactions and logins with SMS codes

What types of cookies do we use?

There are a number of different types of cookies, however, our website uses:

- **Functionality** - Our Company uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
- **Advertising** - Our Company uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. Our Company sometimes shares some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.
- **Google Analytics** - these cookies are managed by third parties and our Company does not have access to read or write this data. To change the cookie settings installed by Google Analytics, please visit <http://tools.google.com/dlpage/gaoptout>.

How to manage cookies?

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

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