# Privacy Policy

Vienna Consulting s.r.o. | www.odprezentuj.cz | effective from 1 November 2026

## Personal data controller and data subject

The controller of personal data is **Vienna Consulting s.r.o.**, with registered office at Osadní 1466/3, 170 00 Prague 7, Czech Republic, ID No.: 290 44 383, VAT No.: CZ29044383, registered in the Commercial Register maintained by the Municipal Court in Prague, Section C, Insert 162403 (hereinafter referred to as the **controller**). The data subject may contact the controller in writing at the address of its registered office or by e-mail at firma@odprezentuj.cz.

The data subject is a natural person who has provided the controller with his/her personal data in connection with an enquiry about the controller's services (in particular via the contact form on the controller's website www.odprezentuj.cz), on the basis of a contract concluded with the controller or in connection with the use of the controller's website. The data subject may also be a natural person acting on behalf of the controller's client (e.g. an employee or contact person) or a natural person whose personal data the controller has obtained from other lawful sources.

The controller has not appointed a data protection officer.

## Scope of processing of personal data

The controller shall process personal data to the extent that they are provided to it by the data subjects or to the extent that the controller obtains them from other lawful sources. These include in particular:

- name and surname,
- title,
- business name, employer and job position,
- the address of the registered office or place of business,
- billing details (identification number, tax identification number, billing address),
- e-mail,
- phone,
- content of communication and enquiries,
- payment details,
- signature (where a contract is concluded),
- network identifiers,
- personal data obtained from cookies.

## Purpose of processing personal data

The controller processes the personal data of data subjects for the purpose of handling enquiries and preparing offers, fulfilling the contract concluded between the data subject and the controller (in particular the preparation of presentations and the provision of consulting services), fulfilling legal obligations (in particular in the area of accounting and taxes) and for the purpose of direct marketing (i.e. offering the controller's services), including sending commercial communications within the meaning of Act No. 480/2004 Coll., on certain information society services.

The controller may send commercial communications (newsletters) only if the data subject has subscribed to them or if the controller has obtained the data subject's electronic contact details in connection with

the provision of its services and the commercial communications relate to similar services of the controller. The data subject may opt out of receiving commercial communications at any time, easily and free of charge, by sending an e-mail to firma@odprezentuj.cz or by using the link provided in each individual commercial communication.

There is no automated decision-making, including profiling, referred to in Article 22 of the General Data Protection Regulation 2016/679.

## Assessment of the necessity of processing

The controller is committed to protecting the privacy of data subjects and therefore only processes personal data that is strictly necessary for the stated purposes of processing.

## Legal basis for the processing of personal data

The legal basis for processing carried out for the purpose of handling enquiries and preparing offers is the taking of steps at the request of the data subject prior to entering into a contract. The legal basis for processing carried out for direct marketing purposes is the consent of the data subject to the processing of personal data (subscription to commercial communications) or the legitimate interest of the controller (sending commercial communications relating to similar services to electronic contact details obtained in connection with the provision of the controller's service pursuant to Section 7(3) of Act No. 480/2004 Coll.).

In other cases, the legal basis for the processing is the fulfilment of the contract, the protection of the legitimate interests of the controller (protection of property, assertion of rights under the contract in legal proceedings, etc.) and the fulfilment of a legal obligation.

## Period of processing of personal data

In the case of personal data processed for the performance of a contract, the controller processes personal data for the duration of the contractual relationship and subsequently for a further 10 years, taking into account the limitation periods set out in the Civil Code. In the case of processing for the purpose of compliance with a legal obligation, the controller shall process personal data for the period provided for by law. In the case of personal data processed on the basis of consent, the controller shall process the personal data for a period of 10 years or until the consent to the processing of personal data is withdrawn by the data subject. This is without prejudice to the controller's obligation to process personal data for the period of time specified by or in accordance with the relevant legislation.

Personal data obtained in connection with an enquiry that did not lead to the conclusion of a contract is processed by the controller for a period of 3 years from the last communication with the data subject.

Personal data processed for marketing purposes on the basis of legitimate interest (obtaining electronic contact details in connection with the provision of the controller's service pursuant to Act No. 480/2004 Coll.) is processed by the controller for a period of 3 years from the last provision of a service, unless the data subject objects to this processing before that time.

## Withdrawal of consent to the processing of personal data

If the data subject has given the controller consent to the processing of personal data, he or she may withdraw his or her voluntary consent to the processing of personal data at any time, free of charge, by sending an e-mail to firma@odprezentuj.cz. Withdrawal of consent does not affect the lawfulness of processing based on consent given prior to its withdrawal. Withdrawal of consent also does not affect the

processing of personal data that the controller processes on a legal basis other than consent (i.e. in particular if the processing is necessary for the performance of a contract, the protection of the controller's legitimate interests or the fulfilment of a legal obligation or for other reasons specified in applicable law).

## Access to personal data

The personal data of data subjects is accessible to the controller and, where applicable, to third party recipients who provide appropriate safeguards and whose processing meets the requirements of applicable law and ensures adequate protection of the rights of data subjects.

The recipients of personal data are in particular providers of accounting and tax services and of the accounting system (Pohoda), IT system administrators, legal advisers, collaborators of the controller involved in the preparation of orders, the provider of the website and contact form Webflow, the provider of e-mail, communication and office services Microsoft (in particular Outlook, Teams, SharePoint and other Microsoft 365 applications), the provider of the messaging application WhatsApp, providers of file sharing and transfer services (WeTransfer, Ulož.to), providers of analytics and marketing services (in particular Google, Meta Platforms – Facebook, Instagram and LinkedIn) and public authorities to whom the controller is obliged to provide personal data (e.g. tax authorities).

Personal data is processed primarily within the European Union or the European Economic Area. When the services of Webflow, Microsoft, WhatsApp, Google, Meta Platforms and LinkedIn are used, personal data may be transferred to the USA. Such transfers are based on the EU-US Data Privacy Framework or, where applicable, on standard contractual clauses approved by the European Commission.

## Proof of identity of data subjects

The controller is entitled to require proof of the identity of data subjects in order to prevent unauthorised persons from accessing personal data.

## Rights of data subjects in relation to personal data

In particular, the data subject has the following rights in relation to personal data:

- **a)** the right to withdraw consent at any time;
- **b)** the right to rectify or supplement personal data;
- **c)** the right to request restriction of processing;
- **d)** the right to object to or complain about processing in certain cases;
- **e)** the right to request data portability;
- **f)** the right of access to personal data;
- **g)** the right to be informed of a personal data breach in certain cases;
- **h)** the right to erasure of personal data (right to be forgotten) in certain cases; and
- **i)** other rights set out in the Personal Data Processing Act and the General Data Protection Regulation 2016/679.

### What does it mean that the data subject has the right to object?

According to Article 21 of the General Data Protection Regulation 2016/679, the data subject has the right to object to the processing of personal data if the processing is carried out on the basis of legitimate interest, including processing for direct marketing purposes. The objection may be submitted to the controller in writing or by e-mail to the following address: firma@odprezentuj.cz. If the data subject objects to the processing, the controller shall no longer process the personal data unless the controller

demonstrates compelling legitimate grounds for the processing which override the interests or rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims. If personal data are processed for direct marketing purposes and the data subject objects to such processing, the controller shall no longer process the personal data to that extent.

Further information on this right is contained in particular in Article 21 of the General Data Protection Regulation 2016/679.

## Obligation to provide personal data

Personal data is provided by the data subject on a completely voluntary basis. He or she is under no obligation to provide it. If he/she does not provide personal data, he/she does not face any sanctions. However, if the data subject does not provide his or her personal data to the controller, it will not be possible to handle their enquiry or to conclude or properly perform a contract between the data subject and the controller. However, it is purely and solely the data subject's choice whether or not to enter into a contractual relationship with the controller.

## Security of personal data

All personal data is secured by standard procedures and technologies. Personal data that is processed in electronic form is stored within the internal system and is only accessible to authorised users working with this personal data via devices secured by a login and password. The controller uses professional antivirus protection and a firewall, which it regularly updates. The controller shall regularly check the system for vulnerabilities and attacks and shall apply such security measures as the controller may reasonably be required to take to prevent unauthorised access to the personal data provided and which, having regard to the current state of technology, provide adequate security. Personal data processed in written form shall be stored in secure premises of the controller to which only authorised persons have access. All security measures taken are regularly updated.

Although the controller secures personal data by means of appropriate technical and organisational measures, it is not objectively possible to guarantee their security completely. Therefore, it is also not possible to ensure 100% that the personal data provided cannot be accessed by third parties, copied, disclosed, altered or destroyed by breaching the controller's security measures. However, in this context, the controller guarantees that it takes all reasonable steps to keep the personal data secure and regularly checks for security breaches.

## Cookies

The controller uses cookies on its website www.odprezentuj.cz, which are stored on the devices of data subjects. Necessary cookies ensure the basic functionality and security of the website and are stored without consent. Analytical, marketing and preference cookies (which remember settings such as the selected language) are only stored with the prior consent of the data subject. Consent can be changed or withdrawn at any time in the cookie settings on the website.

Detailed information on individual cookies, their providers and their storage period is set out in a separate Cookie Policy, which is available on the controller's website.

Standard web browsers (Safari, Microsoft Edge, Firefox, Google Chrome, etc.) support cookie management. Within the settings of the browsers, the data subject can manually delete, block or completely prohibit the use of individual cookies, or block or allow them only for individual websites. For more detailed information, the data subject can use the help section of their browser.

The controller uses so-called temporary cookies and persistent cookies on its website. Temporary cookies are stored on the device only until the internet browser program is closed. Temporary cookies allow information to be stored when moving from one website to another and eliminate the need to re-enter certain data. Persistent cookies help to identify the device of data subjects in the event of repeated visits to the website and allow the website to be adapted to the interests of data subjects.

## Final provisions

The data subject has the right to lodge a complaint regarding the processing of personal data by the controller with the Office for Personal Data Protection, Pplk. Sochora 27, 170 00 Prague 7, website: www.uoou.cz. Alternatively, he/she may apply for judicial protection before a competent court.

This policy takes effect on 1 November 2026.