

PRIVACY POLICY AND DATA PROTECTION POLICY

This page provides an overview of the main principles of privacy and other data processed.

WHO WORKS WITH YOUR DATA?

Company FRESHLABELS s.r.o. (VAT No: 227 93 593, registered office: Panská 1308/9, 110 00 Praha 1, registered in the Commercial Register kept by the Municipal Court in Prague, Section C, Insert 267724) is within the meaning of the General Data Protection Regulation / 679 (GDPR), as an operator of the internet store and fashion network located under the website www.freshlabels.cz, the administrator of your personal data, i.e. it collects, stores and uses (and otherwise processes) your personal data for the performance of its business activities for which personal data processing is further defined. FRESHLABELS s.r.o. may also entrust the processing of your personal data to a third party (the processor) with a clear purpose and under clearly defined rules (see below: Who will have access to my data?)

Administrator appoints a Data Protection Officer who can be contacted by e-mail at gdpr@freshlabels.com.

WHAT DATA DO WE PROCESS?

We process only personal information you provide us with in connection with the use of our services (e.g. ordering one of our goods, or subscribing to newsletters), respectively concluding a contract for the use of this service. This is the most common information you provide when signing up for one of our services:

- E-mail
- Password in encrypted form
- First name and surname (only if necessary for a particular service) or nickname
- Contact and/or delivery address (for order delivery)
- Profile information such as age, gender
- Phone number (for order status information)
- Payment information (payment card number) that we store in your account (e.g. in the contact form)

and further information we obtain from the use of our services:

- IP address - company ID, VAT number
- cookies (for online services)
- possibly another online identifier
- video recording (camera system in stores)

WHY IS YOUR PERSONAL DATA PROCESSED?

The main reason we process your personal information is to manage your user accounts for our services. So we can provide you with the services and products you are or have been interested in (including administration and payment in the event of an order) and so

we can ensure safety and constantly increase the security of our services and thus your data.

We further process your data for:

- performance of the contractual relationship (name and surname, address, e-mail, phone, ID and VAT, payment details, password in encrypted form)
- for accounting and tax purposes (purposes) and other legal obligations
- improving the quality of our services and developing new ones (profiling information such as age and gender, first name and surname, e-mail)
- performing analyses and analytic measurements to discover the performance of our services (cookies, IP address)
- analysis of your preferences and display of content that corresponds to your individual needs (cookies, IP address)
- gaining advantages in marketing campaigns developed by us (name and surname, e-mail address)
- participation in consumer competitions (name and surname, e-mail, address) - sending business messages (e-mail: unsubscribe@freshlabels.cz) and newsletters (e-mail, first name and surname, phone)
- answering your inquiry sent via the contact form (if you wish to receive this message in your account) e-mail, address, phone
- health and property protection (image record) Your personal data is processed manually as well as automated. Company FRESHLABELS s.r.o. is authorized to collect, store and use certain information through automated means such as statistical information whenever you visit our website.

WHO WILL HAVE ACCESS TO YOUR DATA?

Your data is safe with us. We carefully choose our partners to whom we entrust your data and who are able to provide you with the technical and organisational security of your data to prevent un-authorized access to your data or other misuse. Protecting your data is our priority. All our partners are bound by the confidentiality obligation and must not use the data provided for any other purpose than agreed.

The third parties that may have access to your personal data by the nature of the service you use or have used are:

- the persons we provide data to analyse the traffic to our sites;
- those who provide technical services to us for certain services or technology operators that we use for our services;
- People who provide us with the security and integrity of our services and sites for us and who are regularly testing this security;
- payment gateway providers (payment card providers);
- shipping service providers who deliver your orders to you;
- providers of technical solutions for easy delivery of your order and notification of order delivery;
- technical solution operators, thanks to which we can show you relevant content and advertising tailored only for you.

WHAT ARE COOKIES AND WHAT TYPES DO WE USE?

Just like every website on the planet Earth, Freshlabels also uses cookies.

Cookies are text files that contain a small amount of information that can be downloaded to your computer, mobile, or other device when you visit a website. Subsequently, each time you visit this site, cookies are sent back to the original website or to another page that recognizes cookies.

The individual person is not identifiable on the basis of this information, even with the use of any other information in our possession. For example, the information may include the type of device and browser used, the language preferences, or pages visited. They can also help you learn about products that match your interests and preferences (via ads), so you do not have to look at something that has nothing to do with you. Cookies are not a hazard, they do not serve to get any sensitive personal information, but they are important for privacy protection. We do not use cookies to determine the identity of the users on our website or to abuse your log-in information. We use cookies to recognize returning visitors to our websites to make it easier to navigate the website for you. The cookie stores preferential local and language settings for the user and a randomly assigned identifier of your visit. We collect information from a cookie on our site in order to better monitor the number of new and returning visitors, as well as for internal analysis of the pages which are visited, in order to better understand how our website is browsed. We use this information to improve navigation on our Web sites and provided services. Another group is third-party cookies (such as Google Analytics for analysis of the traffic of a specific website or certain services or cookies of the advertising system operators on our site). These cookies are managed by third parties and we do not have access for reading and writing of those information. Simply to show you the things you're interested in, more easily and quickly. Many browsers automatically accept cookies by default, but you can usually reject or selectively accept only some cookies using your browser settings. However, if you completely disable cookies, some of our site functions may not be accessible or may not display properly. Another option is to browse pages in "anonymous mode" where cookies are not stored at all. Detailed information for all browser types can be found here: aboutcookies.org. If your browser has cookies enabled, we will assume that you agree to the use of standard cookies on our sites. If you do not want to store these cookies, you can block them here. You as a user can reject cookies. However, it is possible that in some cases it will not be possible to display a certain service without using cookies.

HOW LONG DO WE STORE YOUR DATA?

We process and store your personal data for as long as it is necessary to ensure all the rights and obligations arising from the contract, i.e. at least for the duration of your order's execution and for the duration of FRESHLABELS s.r.o. as a trustee in accordance with generally binding legal regulations or for which you have given us consent for processing them. In other cases, the processing time is the direct result of processing type or is given by the data protection legislation.

We process the personal data according to the purpose:

- Performance of the contractual relationship - until cancellation

- Improvement of the quality of the services provided and development of the new ones - max 2 years
- Implementation of analyses and measurements, analysis of your preferences and display of content - max 6 months
- Obtaining and delivering prizes in consumer competitions - to appeal
- Sending business messages and newsletters FRESHLABELS s.r.o. - to appeal
- Accounting and tax purposes - 10 years from the following calendar year after performance of the performance
- Other legal obligations fulfilment - max. 5 years
- Processing of personal data on the basis of consent - to appeal
- Response of your inquiry - to appeal

CAN WE STORE AND PROCESS YOUR PERSONAL DATA WITHOUT YOUR CONSENT?

Yes, we may process your personal information without your consent, but only for the purpose of providing a service or product (fulfilment of a contract between you and us, the agreement also constitutes the actual use of a particular service without the need to sign anything); fulfilment of the legal obligations that result from us from generally binding legal regulations (e.g. we are obliged to keep operational and localisation data on the basis of Act No. 127/2005 Coll., on electronic communications); or processing that is necessary for the purposes of our legitimate interests (e.g. direct marketing, security of our sites). The possibility and legality of such processing results directly from applicable legal regulations, and your consent to such processing is not necessary.

BASE ON WHAT DO WE WORK WITH YOUR PERSONAL DATA?

As stated above, we may process your personal information on the basis of your consent, but also for our legitimate interest (in particular processing for the purpose of direct marketing) or for the fulfilment of the contracts between us, to the extent which is necessary to achieve this. Last but not least, this is the reason for us to process your personal data without your consent to comply with our statutory obligations. Specific purposes of individual data processing are stated above.

ARE PERSONAL INFORMATION SAFE?

All personal information you provide to us are secured by standard procedures and technologies. In this regard, we assure you that we regularly check, that the system does not have any vulnerabilities and is not exposed and that we use such safety precautions to prevent unauthorised access to your personal data, and to provide sufficient security with respect to the state of the art. The security measures adopted are then regularly updated.

To protect your personal data better, access to these data is password-protected, and sensitive data is encrypted when transferred between your browser and our website.

However, without your help and responsible behaviour, we are not able to fully guarantee the security of your data. So help us ensure the security of your data by keeping your

unique passwords and other access information for our services secret and please follow the basic security guidelines.

HOW YOU CAN REVOKE YOUR CONSENT TO THE PROCESSING OF PERSONAL DATA?

Your voluntary consent of the processing of your personal data may be revoked at any time free of charge by sending an e-mail to: gdpr@freshlabels.cz. If you revoke the consent about the processing of your personal data there is a possibility to continue processing your personal data based on your consent that was given prior to its revocation. Revocation of consent also has no effect on the processing of personal data that we process on a legal basis other than consent (i.e., in particular, if the processing is necessary to fulfil the contract, legal obligations or for other reasons stated in the applicable legislation).

AM I OBLIGED TO PROVIDE MY PERSONAL DATA? WHAT HAPPENS IF I DO NOT PROVIDE MY PERSONAL DATA?

You are providing us with your personal information on a voluntary basis (however, for some services, some personal information are required to make the service available, i.e. if you do not provide it, you will not be able to use the service).

Processing your personal information, often only in anonymised form, without being able to identify you as an individual, enables us to provide you with our services and to continually improve them. If you do not give us your consent, or may subsequently recall it, it may happen that we will no longer be able to provide you with some of our services or we will not be able to provide the service in its full or quality. However, you are not obliged to use our free services.

WHAT ARE ALL THE RIGHTS I HAVE WITH THE PROTECTION OF PERSONAL DATA?

As a data subject, you have the rights listed below, which you may derive legally and you can apply any time. You have the right of:

- access your personal data,
- correcting inaccurate or false personal data,
- clarification request whether there is a suspicion that the processing of personal data is detrimental to the protection of personal and private life or that personal data is being processed inconsistently
- contact with the Office for the Protection of Personal Data,
- deletion of personal data if personal data are no longer required for the purposes for which they were collected or otherwise processed, if they were unlawfully processed,
- limitation of the processing of personal data.

With effect from 25 May 2018, you may also claim:

- the right to data portability

- the right to object after which your personal data will stop being processed, if it is not proven that there are serious legitimate prevail over the interests or rights and freedoms of the data subject, in particular, if it is the case for the enforcement of legal claims.

- RIGHT TO ACCESS PERSONAL DATA

IF YOU WANT TO KNOW WHETHER WE ARE PROCESSING YOUR PERSONAL DATA OR NOT, YOU HAVE THE RIGHT TO OBTAIN INFORMATION FROM US IF YOUR PERSONAL DATA ARE PROCESSED. IF THEY ARE, YOU HAVE THE RIGHT TO ACCESS YOUR PERSONAL DATA. IN CASE OF THE REPETITIVE REQUESTS, WE ARE ALLOWED TO REQUEST AN ADEQUATE FEE FOR THIS SERVICE.

- RIGHT TO CORRECT THE INACCURATE AND FALSE PERSONAL DATA

IF YOU FEEL WE ARE WORKING OR STORING INACCURATE AND/OR FALSE PERSONAL DATA YOU HAVE A RIGHT TO REQUEST THE CHANGE THE DATA. WE WILL EDIT THE DATA WITHOUT DELAYS WITH RESPECT TO THE TECHNICAL OPTIONS.

- RIGHT TO REQUIRE EXPLANATION

IF YOU ARE CONCERNED THAT OUR PROCESSING OF YOUR PERSONAL DATA DOES NOT PROTECT YOUR PERSONAL AND PRIVATE LIFE, OR THAT YOUR PERSONAL DATA ARE NOT PROCESSED IN CONFLICT WITH THE LEGISLATION, YOU MAY REQUIRE AN EXPLANATION.

- RIGHT TO APPEAL TO THE PERSONNEL DATA PROTECTION OFFICE

IF YOU ARE CONCERNED ABOUT THE HANDLING OF YOUR PERSONAL DATA YOU HAVE A RIGHT TO REFER TO THE OFFICE FOR PERSONAL DATA PROTECTION (WWW.UOOU.CZ).

- RIGHT OF DELETION

IF YOUR PERSONAL DATA ARE NOT REQUIRED FOR THE PURPOSES OF WHICH THEY HAVE BEEN COLLECTED OR OTHERWISE PROCESSED, OR IF THEY WERE USED IN CONFLICT WITH THE LEGISLATION, YOU HAVE THE RIGHT TO REQUEST THE DELETION OF THOSE INFORMATIONS.

- RIGHT TO LIMIT THE PROCESSING OF PERSONAL DATA

IF YOU DO NOT WANT TO DELETE THE DATA, BUT ONLY TO LIMIT THE PROCESSING OF YOUR PERSONAL DATA, YOU MAY REQUEST THE LIMITATION OF THE PROCESSING OF YOUR PERSONAL DATA.

- RIGHT FOR DATA TRANSFERRING

IF YOU WANT TO SUBMIT YOUR PERSONAL INFORMATION TO THE THIRD PARTIES, YOU MAY USE YOUR DATA TRANSFERRING RIGHTS. IN THE EVENT THAT THIS COULD LEAD TO THE OFFENCE OF THE LAW OR THE FREEDOM OF THE THIRD PARTIES, WE WILL NOT BE LIABLE FOR YOUR SUBMISSION.

- THE RIGHT TO OBJECT

YOU HAVE A RIGHT TO OBJECT TO THE PERSONAL DATA PROCESSING. EITHER

DEVELOPED FOR FULFILLING THE PURPOSE OF PUBLIC INTEREST OR THE PUBLIC WORK OR FOR THE PROTECTION OF OUR ELIGIBLE INTERESTS. IF WE FAIL TO PROVE A SIGNIFICANT AND APPROPRIATE GROUNDS FOR SUCH DATA PROCESSING, WHICH REMAINS BEFORE YOUR INTERESTS OR RIGHTS AND FREEDOMS, THE DATA PROCESSING WILL BE STOPPED WITHOUT ANY DELAY.

- RIGHT TO WITHDRAWAL THE CONSENT

IF YOU AGREED WITH PERSONAL DATA PROCESSING, YOU CAN WITHDRAWAL THIS CONSENT AT ANY TIME.

HOW CAN YOU CAN CONTACT US?

In case of any personal data protection request or withdrawal of consent to further processing of your personal data, please use the contact information available [HERE](#) or send an e-mail to gdpr@freshlabels.cz or send us a letter at our address: FRESHLABELS s.r.o., Vodičkova 33, 110 00 Praha 1.

We would like to inform you that we may want you to prove your identity to us in an appropriate way so that we can verify your identity. This is a precautionary security measure to prevent unauthorized persons from accessing your personal data. In order to increase the quality of service and keep records of our statutory obligations, all communications with you are monitored.

CAMERA SYSTEMS IN RETAILS

A legitimate reason for processing is the interest of the FRESHLABELS s.r.o. (protection of property against loss or destruction, protection of the life and health of employees and third parties). The record may be handed over to the law enforcement or other public authority.

This version of the “PRIVACY POLICY AND DATA PROTECTION POLICY” is effective from May 21, 2018