

## Principles of Personal Data Protection

The company **Via Sancta Vinoř s.r.o.**, Identification No.: 04212771, registered office: Na příkopě 859/22, Nové Město, 110 00 Praha 1, File No.: C 244072 kept by the Municipal Court in Prague (hereinafter also as “**We**” or “**Our Company**”) pays considerable attention to personal data protection. In this document you will find information what personal data we are processing particularly about our customers and users of our services, whether we are processing such data on the basis of consent or on the basis of another legal ground, for what purposes we are using them, whom we may transfer them and what are your rights in connection with processing of your personal data.

These principles are drawn up in compliance with the legislation relating to personal data processing, in particular with Regulation No. 2016/679 of the European Parliament and of the Council (EU) of 27 April 2016 on the protection of individuals in connection with personal data processing and on the free movement of such data and on repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter also as “**GDPR**”).

### 1. Introductory provisions and basic terms definitions

- 1.1. Our company is an operator of the website <https://www.viasanctavinor.cz> and you are accessing to this website as its user or a party interested in products or services or information offered/provided by Our Company.
- 1.2. Since you are providing us your personal data, we have a legal status towards you as a **Controller** of your personal data.
- 1.3. The terms “**Controller**”, “**Processor**”, “**Personal Data**”, “**Processing**” used in this text are to be interpreted within the context of GDPR:
  - 1.3.1. **Controller** within the meaning of Article 4(7) of GDPR means a natural person or legal entity, public authority, agency or another subject which itself or jointly with other subjects determines purposes and means for personal data processing.
  - 1.3.2. **Processor** within the meaning of Article 4(8) of GDPR is a natural person or legal entity, public authority, agency or another subject processing personal data for the Controller.
  - 1.3.3. **Personal Data** mean all information on an identified or identifiable natural person (i.e. on the data subject).

1.3.4. **Personal Data Processing** within the meaning of Article 4(2) of GDPR means any operation or a set of operations with personal data or personal data files performed through automated processes, such as collection, recording, configuration, structuring, storage, adjustment or modification, searching, consultation, using, availability through transmission, dissemination or any other making available, ranking or combining, limitation, erasure or destruction.

## 2. For what purpose we are processing your personal data?

2.1. We are processing your personal data solely for the purposes of which you were informed by Our Company. What personal data we are processing and for what purposes depends on in which way you have provided your personal data to us. You may provide us your personal data in the following ways:

### 2.1.1. When visiting our website

When you are visiting our website <https://www.viasanctavinor.cz> we are automatically processing some personal data, to the extent and for the purpose, for the period and under the authorization (legal grounds) provided as follows:

<b>Purpose</b>	<b>Extent of the processed information</b>	<b>Legal grounds</b>	<b>Processing period</b>
Improvement of our website	Data on your behaviour on the web (through the so-called cookies)	Legitimate interest of Our Company to improve our website	For a period of 2 weeks
Creation of statistics and reports on using our website	Data on your behaviour on the web (through the so-called cookies)	Legitimate interest of Our Company to measure the effectiveness of our website, advertising	For a period of 2 weeks

		on this website	
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You have the right to raise objection to processing of your personal data for the purpose of performance of our legitimate interest to improve and measure effectiveness of our website. In case we have no legitimate reasons to continue with processing of your personal data for these purposes, we will stop processing your personal data in this connection.

#### 2.1.2. In case you communicate with us through various channels

If you communicate with us through various channels, in particular by an enquiry via our website, email, chatting tools and social networks. In such case we are processing your personal data to the extent, for the purpose and under authorization (legal grounds) provided as follows:

<b>Purpose</b>	<b>Extent of the processed information</b>	<b>Legal grounds</b>	<b>Processing period</b>
Settlement and record of your requirements, proving that we have accepted and settled your requirement.	Name, Surname, telephone number, e-mail address, records of your requirements and communication performed	Legitimate interest consisting in possibility to keep in contact with you	During the period of legitimate interest but not exceeding the period of 3 years from the last communication

You have the right to raise objection to the processing based on our legitimate interest (see 4.98.).

#### 2.1.3. In approaching with offers of our products and services, incl. customized offers

We want to maintain further contact with you. In this case we are processing your personal data to the extent, for the purpose and due to authorization (legal grounds) provided as follows:

<b>Purpose</b>	<b>Extent of the processed information</b>	<b>Legal grounds</b>	<b>Processing period</b>
Approaching with our offers of products and services, incl. customized offers	Name, Surname, telephone number, e-mail address, records of your requirements and communication performed	Legitimate interest consisting in possibility to keep contact with you and send you special offers intended for you	During the period of lasting legitimate interest but not exceeding the period of 3 years after the last login-in

As regards approaching with our offers of products and services, incl. customized offers, we will be happy to be in contact with you. In order to avoid sending you offers which you are not interested in, we will use the information from our records relating to your requirements and communication performed.

However, at the same we do not want to bother you, therefore you may exclude sending of business communications by the below mentioned procedure and also within each e-mail sent by us. (see Article 4.9.).

You have the right to raise objection to processing of your personal data for the purpose of sending commercial communications, on the basis of which we will immediately stop processing your personal data.

2.1.4. In approaching with offers of products and services of our business partners, including customized offers

We would like to approach you with commercial communications containing newsletters and offers of products and services of our business partners, including offers customized directly for you. In this case we are processing your personal data to the extent, for the purpose and under authorization (legal grounds) mentioned below:

<b>Purpose</b>	<b>Extent of the processed information</b>	<b>Legal grounds</b>	<b>Processing period</b>
Approaching with offers of products and services, including customized offers of Our Company's business partners	Name, Surname, telephone number, e-mail address, records of your requirements and communication performed	Consent to the processing of personal data and sending commercial communications	Until withdrawal of consent to the processing of personal data and sending commercial offers

Providing these personal data is quite voluntary from your side, however, these data are necessary in order that we may send you our commercial communications with offers of products and other services of our business partners, including offers customized for you.

Therefore, in order to avoid sending offers you are not interested in, we may use the information from our records of your requirements and communication performed.

You have always the right to withdraw your consent to the processing of your personal data, namely through the procedure mentioned below in Article 4.2.

### **3. Whom we are transferring your personal data?**

3.1. We are not aware in advance, whom we will transfer personal data. Therefore we provide here the categories of possible recipients with justification, why your personal data might be transferred:

Recipient	Ground for disclosure
Persons that are assisting us in informing of our products or services or participating in our activity (e.g. real estate agents).	We need to be able to settle effectively your requirements and provide you information on our products and services.
Person ensuring operation of the website, applications and our software (computer systems), including persons providing cloud services	We need the software equipment provider which is in the position of a processor, to provide servicing of our website and ensure operation of information systems.
Persons ensuring dissemination of e-mails.	It may be the case that we will entrust with dissemination of e-mails offering our products and services a third person to which we will provide your e-mail address.

3.2. We would like to inform you that we will always satisfy your right to gain information about whom, when and for what purpose your personal data were transferred.

#### 4. What are your rights?

4.1. In view of the fact that Our Company is processing your personal data, you are holding the rights of which we would like to inform you in this section. You may exercise all your rights in any way which will be convenient for you and which will enable you to verify that is you who is really asking us (it will enable to verify your identity) and we will seek to accommodate you as far as possible. But in order to be able to satisfy you as good as possible, we would like to ask you to enforce your rights in written at the e-mail address [advisor@atlantisdevelopment.eu](mailto:advisor@atlantisdevelopment.eu).

4.2. Right to withdrawal of consent – we are processing some of your personal data on the basis of your consent. It is your right to withdraw your consent to processing of your personal data, including the consent to dissemination of commercial communications. You may withdraw your consent through a request sent to the address [advisor@atlantisdevelopment.eu](mailto:advisor@atlantisdevelopment.eu).

As regards processing of your personal data for the purposes of commercial communications dissemination, you may simply withdraw your consent to processing of personal data and consent to dissemination of commercial communications by clicking on the relevant reference mentioned at the end of each commercial communication or by adjusting your user setting of your user profile.

4.3. Right of access – you have the right of access to personal data Our Company is processing about you and also the right to information of what personal information we are processing about you, for what period, what are purposes of their processing, to whom we are making them available and whether we are using them for automated decision (or how this automated decision is functioning).

We will provide you a copy of your personal data free of charge. Only in case more copies are required, we will take the liberty to ask you for necessary payment for their provision.

4.4. Right to rectification – in case you find that we are processing incomplete or incorrect personal information about you, you will be entitled to require from us rectification or, as far as required by the purpose of such personal data processing, their completion.

4.5. Right to erasure – you have also the right to erasure of your personal data stored and processed by Our Company. In order that you may require erasure, one of the following reasons must exist:

- your personal data are no more needed for the purpose for which they were collected or processed;
- Our Company is processing your personal data unlawfully;
- you have withdrawn your consent on the basis of which the processing of your personal data was performed and we have no other authorization (legal grounds) to continue processing of such data;
- you will raise objection to the processing of your personal data, as far as such personal data are being processed for the purpose of direct marketing (e.g. dissemination of commercial communications);
- you will raise objection to processing of your personal data we are processing on the basis of our legitimate interest and we will not be able to prove that our legitimate interest override your right to erasure;
- there exists a legal ground requiring erasure of such personal data;
- Our Company is processing personal data of a child without existing parental consent to such processing.

We take the liberty of drawing your attention to the fact that a situation may arise where your personal data cannot be erased on the basis of your withdrawal of the consent to processing of personal data or upon your request for erasure of personal data. This relates in particular to a situation in which we are required by law to process your personal data. If such situation arises, Our Company will inform you of the reason on the basis of which your personal data cannot be erased in spite of your explicit request for erasure of your personal data.

4.6. Right to data portability – another right you may exercise is the so-called right to data portability. By virtue of this right you may ask for provision of your personal data provided to us on the basis of your consent and processed by us in an automated manner. Your personal data which meet these conditions will be provided by us upon request in a commonly used, structured and in machine-readable format or we will transfer them upon your request to another controller in accordance with your designation, if technically feasible.

4.7. Right to restrict processing – in cases where you feel that your personal data processed by Our Company are inaccurate, you have the right to require a restriction of your personal data processing for a period necessary to verify accuracy of your personal data and their possible correction.

You have this right also in the following cases:

- processing of your personal data by Our Company is unlawful but you do not wish your personal data to be erased;
- Our Company does not need your personal data any more for the purpose to which we were processing them but you insist on their processing (in particular storage) by Our Company in order to determine, exercise or defend your legal claims;
- you have raised objection to processing of your personal data on the basis of a legitimate interest of Our Company, such restriction of procession being in this case applicable for the period necessary to determine whether our legitimate interest overrides your right to discontinue processing of your personal data.

4.8. Right to object processing of your personal data on the basis of a legitimate interest – in view of the fact that we are processing some of your personal data on the basis of a legitimate interest, you have the right to object such processing, on the basis of which we will assess whether it is in our legitimate interest to process your personal data for the that purpose or whether your right to discontinue processing of your personal data overrides.

- 4.9. Right to object processing of your personal data for the purpose of direct marketing – you have the right to raise objection to our processing of your personal data for the purpose of direct marketing (e.g. for the purpose of commercial communications dissemination). In such case we will stop processing your personal data for this purpose.
- 4.10. Right to complaint – in case all the above rights are insufficient from your point of view or you are of the opinion that Our Company breaches your rights in any way, you may lodge a complaint with a supervisory authority. You may lodge the complaint through the contact with The Office for Personal Data Protection on the website <https://www.uoou.cz/podatelna-uradu/os-1006>.

## Principles of Personal Data Protection

The company **DUONA s.r.o.**, Identification No.: 016 08 649, registered office: Na příkopě 859/22, Nové Město, 110 00 Praha 1, File No.: C 208270 kept by the Municipal Court in Prague (hereinafter also as “**We**” or “**Our Company**”) pays considerable attention to personal data protection. In this document you will find information what personal data we are processing particularly about our customers and users of our services, whether we are processing such data on the basis of consent or on the basis of another legal ground, for what purposes we are using them, whom we may transfer them and what are your rights in connection with processing of your personal data.

These principles are drawn up in compliance with the legislation relating to personal data processing, in particular with Regulation No. 2016/679 of the European Parliament and of the Council (EU) of 27 April 2016 on the protection of individuals in connection with personal data processing and on the free movement of such data and on repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter also as “**GDPR**”).

### 1. Introductory provisions and basic terms definitions

- 1.1. Our company is an operator of the website <https://www.viasanctavinor.cz> and you are accessing to this website as its user or a party interested in products or services or information offered/provided by Our Company.
- 1.2. Since you are providing us your personal data, we have a legal status towards you as a **Controller** of your personal data.
- 1.3. The terms “**Controller**”, “**Processor**”, “**Personal Data**”, “**Processing**” used in this text are to be interpreted within the context of GDPR:
  - 1.3.1. **Controller** within the meaning of Article 4(7) of GDPR means a natural person or legal entity, public authority, agency or another subject which itself or jointly with other subjects determines purposes and means for personal data processing.
  - 1.3.2. **Processor** within the meaning of Article 4(8) of GDPR is a natural person or legal entity, public authority, agency or another subject processing personal data for the Controller.
  - 1.3.3. **Personal Data** mean all information on an identified or identifiable natural person (i.e. on the data subject).

1.3.4. **Personal Data Processing** within the meaning of Article 4(2) of GDPR means any operation or a set of operations with personal data or personal data files performed through automated processes, such as collection, recording, configuration, structuring, storage, adjustment or modification, searching, consultation, using, availability through transmission, dissemination or any other making available, ranking or combining, limitation, erasure or destruction.

## 2. For what purpose we are processing your personal data?

2.1. We are processing your personal data solely for the purposes of which you were informed by Our Company. What personal data we are processing and for what purposes depends on in which way you have provided your personal data to us. You may provide us your personal data in the following ways:

### 2.1.1. When visiting our website

When you are visiting our website <https://www.viasanctavinor.cz> we are automatically processing some personal data, to the extent and for the purpose, for the period and under the authorization (legal grounds) provided as follows:

Purpose	Extent of the processed information	Legal grounds	Processing period
Improvement of our website	Data on your behaviour on the web (through the so-called cookies)	Legitimate interest of Our Company to improve our website	For a period of 2 weeks
Creation of statistics and reports on using our website	Data on your behaviour on the web (through the so-called cookies)	Legitimate interest of Our Company to measure the effectiveness of our website, advertising	For a period of 2 weeks

		on this website	
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You have the right to raise objection to processing of your personal data for the purpose of performance of our legitimate interest to improve and measure effectiveness of our website. In case we have no legitimate reasons to continue with processing of your personal data for these purposes, we will stop processing your personal data in this connection.

#### 2.1.2. In case you communicate with us through various channels

If you communicate with us through various channels, in particular by an enquiry via our website, email, chatting tools and social networks. In such case we are processing your personal data to the extent, for the purpose and under authorization (legal grounds) provided as follows:

<b>Purpose</b>	<b>Extent of the processed information</b>	<b>Legal grounds</b>	<b>Processing period</b>
Settlement and record of your requirements, proving that we have accepted and settled your requirement.	Name, Surname, telephone number, e-mail address, records of your requirements and communication performed	Legitimate interest consisting in possibility to keep in contact with you	During the period of legitimate interest but not exceeding the period of 3 years from the last communication

You have the right to raise objection to the processing based on our legitimate interest (see 4.98.).

#### 2.1.3. In approaching with offers of our products and services, incl. customized offers

We want to maintain further contact with you. In this case we are processing your personal data to the extent, for the purpose and due to authorization (legal grounds) provided as follows:

<b>Purpose</b>	<b>Extent of the processed information</b>	<b>Legal grounds</b>	<b>Processing period</b>
Approaching with our offers of products and services, incl. customized offers	Name, Surname, telephone number, e-mail address, records of your requirements and communication performed	Legitimate interest consisting in possibility to keep contact with you and send you special offers intended for you	During the period of lasting legitimate interest but not exceeding the period of 3 years after the last login-in

As regards approaching with our offers of products and services, incl. customized offers, we will be happy to be in contact with you. In order to avoid sending you offers which you are not interested in, we will use the information from our records relating to your requirements and communication performed.

However, at the same we do not want to bother you, therefore you may exclude sending of business communications by the below mentioned procedure and also within each e-mail sent by us. (see Article 4.9.).

You have the right to raise objection to processing of your personal data for the purpose of sending commercial communications, on the basis of which we will immediately stop processing your personal data.

2.1.4. In approaching with offers of products and services of our business partners, including customized offers

We would like to approach you with commercial communications containing newsletters and offers of products and services of our business partners, including offers customized directly for you. In this case we are processing your personal data to the extent, for the purpose and under authorization (legal grounds) mentioned below:

<b>Purpose</b>	<b>Extent of the processed information</b>	<b>Legal grounds</b>	<b>Processing period</b>
Approaching with offers of products and services, including customized offers of Our Company's business partners	Name, Surname, telephone number, e-mail address, records of your requirements and communication performed	Consent to the processing of personal data and sending commercial communications	Until withdrawal of consent to the processing of personal data and sending commercial offers

Providing these personal data is quite voluntary from your side, however, these data are necessary in order that we may send you our commercial communications with offers of products and other services of our business partners, including offers customized for you.

Therefore, in order to avoid sending offers you are not interested in, we may use the information from our records of your requirements and communication performed.

You have always the right to withdraw your consent to the processing of your personal data, namely through the procedure mentioned below in Article 4.2.

### **3. Whom we are transferring your personal data?**

3.1. We are not aware in advance, whom we will transfer personal data. Therefore we provide here the categories of possible recipients with justification, why your personal data might be transferred:

Recipient	Ground for disclosure
Persons that are assisting us in informing of our products or services or participating in our activity (e.g. real estate agents).	We need to be able to settle effectively your requirements and provide you information on our products and services.
Person ensuring operation of the website, applications and our software (computer systems), including persons providing cloud services	We need the software equipment provider which is in the position of a processor, to provide servicing of our website and ensure operation of information systems.
Persons ensuring dissemination of e-mails.	It may be the case that we will entrust with dissemination of e-mails offering our products and services a third person to which we will provide your e-mail address.

3.2. We would like to inform you that we will always satisfy your right to gain information about whom, when and for what purpose your personal data were transferred.

#### 4. What are your rights?

4.1. In view of the fact that Our Company is processing your personal data, you are holding the rights of which we would like to inform you in this section. You may exercise all your rights in any way which will be convenient for you and which will enable you to verify that is you who is really asking us (it will enable to verify your identity) and we will seek to accommodate you as far as possible. But in order to be able to satisfy you as good as possible, we would like to ask you to enforce your rights in written at the e-mail address [advisor@atlantisdevelopment.eu](mailto:advisor@atlantisdevelopment.eu).

4.2. Right to withdrawal of consent – we are processing some of your personal data on the basis of your consent. It is your right to withdraw your consent to processing of your personal data, including the consent to dissemination of commercial communications. You may withdraw your consent through a request sent to the address [advisor@atlantisdevelopment.eu](mailto:advisor@atlantisdevelopment.eu).

As regards processing of your personal data for the purposes of commercial communications dissemination, you may simply withdraw your consent to processing of personal data and consent to dissemination of commercial communications by clicking on the relevant reference mentioned at the end of each commercial communication or by adjusting your user setting of your user profile.

4.3. Right of access – you have the right of access to personal data Our Company is processing about you and also the right to information of what personal information we are processing about you, for what period, what are purposes of their processing, to whom we are making them available and whether we are using them for automated decision (or how this automated decision is functioning).

We will provide you a copy of your personal data free of charge. Only in case more copies are required, we will take the liberty to ask you for necessary payment for their provision.

4.4. Right to rectification – in case you find that we are processing incomplete or incorrect personal information about you, you will be entitled to require from us rectification or, as far as required by the purpose of such personal data processing, their completion.

4.5. Right to erasure – you have also the right to erasure of your personal data stored and processed by Our Company. In order that you may require erasure, one of the following reasons must exist:

- your personal data are no more needed for the purpose for which they were collected or processed;
- Our Company is processing your personal data unlawfully;
- you have withdrawn your consent on the basis of which the processing of your personal data was performed and we have no other authorization (legal grounds) to continue processing of such data;
- you will raise objection to the processing of your personal data, as far as such personal data are being processed for the purpose of direct marketing (e.g. dissemination of commercial communications);
- you will raise objection to processing of your personal data we are processing on the basis of our legitimate interest and we will not be able to prove that our legitimate interest override your right to erasure;
- there exists a legal ground requiring erasure of such personal data;
- Our Company is processing personal data of a child without existing parental consent to such processing.

We take the liberty of drawing your attention to the fact that a situation may arise where your personal data cannot be erased on the basis of your withdrawal of the consent to processing of personal data or upon your request for erasure of personal data. This relates in particular to a situation in which we are required by law to process your personal data. If such situation arises, Our Company will inform you of the reason on the basis of which your personal data cannot be erased in spite of your explicit request for erasure of your personal data.

4.6. Right to data portability – another right you may exercise is the so-called right to data portability. By virtue of this right you may ask for provision of your personal data provided to us on the basis of your consent and processed by us in an automated manner. Your personal data which meet these conditions will be provided by us upon request in a commonly used, structured and in machine-readable format or we will transfer them upon your request to another controller in accordance with your designation, if technically feasible.

4.7. Right to restrict processing – in cases where you feel that your personal data processed by Our Company are inaccurate, you have the right to require a restriction of your personal data processing for a period necessary to verify accuracy of your personal data and their possible correction.

You have this right also in the following cases:

- processing of your personal data by Our Company is unlawful but you do not wish your personal data to be erased;
- Our Company does not need your personal data any more for the purpose to which we were processing them but you insist on their processing (in particular storage) by Our Company in order to determine, exercise or defend your legal claims;
- you have raised objection to processing of your personal data on the basis of a legitimate interest of Our Company, such restriction of procession being in this case applicable for the period necessary to determine whether our legitimate interest overrides your right to discontinue processing of your personal data.

4.8. Right to object processing of your personal data on the basis of a legitimate interest – in view of the fact that we are processing some of your personal data on the basis of a legitimate interest, you have the right to object such processing, on the basis of which we will assess whether it is in our legitimate interest to process your personal data for the that purpose or whether your right to discontinue processing of your personal data overrides.

- 4.9. Right to object processing of your personal data for the purpose of direct marketing – you have the right to raise objection to our processing of your personal data for the purpose of direct marketing (e.g. for the purpose of commercial communications dissemination). In such case we will stop processing your personal data for this purpose.
- 4.10. Right to complaint – in case all the above rights are insufficient from your point of view or you are of the opinion that Our Company breaches your rights in any way, you may lodge a complaint with a supervisory authority. You may lodge the complaint through the contact with The Office for Personal Data Protection on the website <https://www.uoou.cz/podatelna-uradu/os-1006>.