

Data Protection – GDPR

Basic information

Personal data controller

We are TRAIVA s.r.o., ID 25380141, VAT CZ25380141, with registered office at Pohraniční 104, 703 00 Ostrava, registered in the Commercial Register maintained by the Regional Court in Ostrava, Section C, Insert 16963, and as the controller we process your personal data. What personal data we process Personal data you provide us We process personal data that you provide us.

More information:

If you order goods or services from us, for example, we need information from you that is marked as mandatory in the order process (this is mainly your name and surname, delivery address). If we did not have this information, we would not be able to deliver the goods to you correctly. In addition, for the purpose of selling goods or services, we need your e-mail address, to which we will send you an order confirmation, which also serves as confirmation of the concluded purchase contract, and a copy of the terms and conditions and complaints policy.

When ordering goods or services, you can also fill in optional data. These help us to better and more efficiently fulfill the contract. For example, if you fill in your telephone number, we can send you information about the delivery of goods, etc. You provide us with optional data voluntarily. After the goods have been delivered to you, you may receive an e-mail message asking you to evaluate the purchased goods. You may also provide us with some personal data before ordering goods or services - for example, if you use the so-called watchdog function ("Price Watch"), we will ask for your email address so that we can send you an email when the goods are available or when the goods are available at the price you specify. If you contact our customer service line or send us a message, we will also process your personal data provided in this communication.

For some services, you may be asked to provide additional personal information (e.g. an ID card or copy of an ID card) to help us verify your identity (either in person at the store or remotely). If you purchase electronic content on our online store, your name is displayed in that electronic content. This is in order to protect against illegal distribution and disclosure of the e-book you have purchased. By filling in the optional data in your user profile, you also provide us with your other personal data, such as frequently used delivery addresses. If you have saved your credit card to speed up further purchases on our online shop, we only have incomplete information about your credit card (the first and last few digits of the credit card associated with your user account). If you want to delete this data as well, just visit your user profile settings. When you pay by credit card from your mobile phone, you will be redirected to a secure payment gateway server. When paying by credit card from a computer, communication with the payment gateway server takes place via the so-called "payment gateway server". Your credit card details are therefore not sent to our company, but are sent directly to our payment gateway provider as part of a secure transmission. The payment

gateway then transmits the data to the relevant banking institution for the payment to be made, again in the context of a secure data transfer.

Personal data we collect other than directly from you

We may also process your personal data as part of joint marketing campaigns. We may combine them for the purposes of marketing campaigns or for the proper performance of a contract. In the event that your personal data is transferred to another entity, we will inform you in advance, including an indication of to whom we are transferring the personal data. If someone passes your personal data to us, they must also inform you in advance.

Personal data of third parties that you provide to us

If you provide us with personal data of third parties, it is your responsibility to inform the person concerned and secure their consent to this privacy policy. For example, it may happen that you purchase goods from us but do not want to collect or claim them. In your user profile, you can designate authorised persons who are authorised to collect the goods on your behalf, for example, or to claim the goods. This will also provide us with their personal data.

Personal data that we process automatically

When you visit our website, we may collect certain information about you, such as your IP address, the date and time you accessed our website, information about your internet browser, operating system or your language settings. We may also process information about your behaviour on our website, e.g. which links you visit on our website and which products you are shown. If you access our website from a mobile phone or similar device, or through one of our mobile applications, we may also process information about your mobile device (data about your mobile phone, any records of app crashes, etc.). You can find more information about data protection [here](#).

You can find additional information and the data protection provisions in [Google's privacy policy](#).

Cookies

We also process cookies automatically. You can turn off personalization and targeted advertising at any time.

More about cookies:

What is a cookie?

It is actually a small text file that is created when you visit any website. It is used as a standard tool to store information about how our site is used. This allows us to distinguish (but not identify) individual users from one another and tailor content to specific preferences. Cookies are important. Without them, browsing the web would be much more difficult.

What are cookies used for?

Cookies serve several purposes. We use the following cookies on the pages of our online shop and in our mobile apps. Without them, our website would not work, e.g. you would not be able to log in to your user account. Functional cookies: these cookies allow us to remember your

basic choices and improve the user experience. This includes, for example, remembering your language or allowing you to stay permanently logged in. Social networking cookies: these cookies allow us to conveniently link you to your social networking profile and, for example, allow you to share products and services with friends and family.

Content personalisation: these cookies allow us to show you content and ads based on the information available about you so that we can best meet your needs. This includes what content you have viewed, or on what device you access our site. Non-personalised advertising: these cookies allow us to show you general advertising for products and services. Personalised advertising: these cookies allow us and our partners to offer you relevant and tailored products and services based on your purchases, your behaviour and your preferences. Audience measurement: these cookies allow us to optimise our site for your convenience based on how you use it. The aim is to remember or anticipate your choices. This includes, for example, the use of features, their location, behaviour on the page.

How you can influence which of your cookies we process

Simply use a common internet browser (e.g. Internet Explorer, Safari, Firefox, Chrome) with the anonymous browsing function enabled, which prevents the storage of data about the websites you visit, or you can disable the storage of cookies in your browser altogether. However, if you also disable the processing of technical and functional cookies, this will prevent some functions that help you from working. You can easily control the processing of analytics cookies by us if you use this additional program from Google (can only be run from your computer). However, by disabling analytics cookies, you will unfortunately make it much more difficult for us to improve our online shop.

Camera systems on our premises

We also automatically process recordings from cameras in our premises. Our brick-and-mortar transmission and recording. Only the image is recorded. We have cameras on our premises both for prevention and to clarify possible illegal activities. We, TRAIVA s.r.o., are the operator of the camera system.

Mobile phone and mobile app versions

If you access our website from a phone, tablet or similar device, we optimise it for these devices. In this case, we process your personal data in a similar way to accessing it from a computer. You also have the option to download our TRAIVA app free of charge, which will make it easier for you to shop. If you allow the app to use location data, we may also use your device's location to provide you with greater user convenience and more relevant offers of goods and services. We may also use the data we collect in this way to send you tailored commercial communications. If you do not wish to do so, you can easily opt-out of receiving commercial communications altogether. Similarly, you may be shown personalised content directly on our website. In this case, you also have the option to disable such personalisation.

Why we collect and process your personal data

We process your personal data for the following reasons:

- Purchase of goods and services: primarily, we process your personal data in order to properly process and deliver your order. If there are any problems, your personal data helps us know who to contact.

- Customer care: if you contact us with a query/problem, we need to process your data to answer/resolve it. In some cases, personal data may also be passed on to third parties (e.g. a goods carrier or service centre).

- User account: thanks to the personal data you provide us in your user profile, a number of useful functions are made available to you (e.g. if you provide your telephone number, we can easily inform you when your order will be delivered). You can change the information you provide at any time, with the exception of your email address, which is used to access your user account.

- Marketing activity:

o Email marketing: we send you commercial email communications based on your consent. You can easily unsubscribe from receiving marketing communications by editing your user profile settings or by calling our helpline at +420 737 777 222. If you create multiple user profiles with the same contact details (e.g. you have several accounts for different email addresses, but the phone number will be the same for all accounts), it is not possible for technical reasons to unsubscribe from marketing communications for all user profiles based on automated processes. In such a case, you need to contact us by phone via email to unsubscribe from commercial communications for all user profiles.

o Telemarketing: we make marketing calls to offer our goods and services and related marketing communications. The legal basis for processing your telephone number is either your consent or at least our legitimate interest in conventional direct marketing. You can object to this processing.

o You may receive a call from either our call centre staff or our robot.

o Push notifications: the TRAIVA mobile app sends so-called push notifications, i.e. short messages to your phone. You can easily adjust the receipt of these notifications in your phone settings.

o Marketing contests: in some cases, the winner of the contest may be photographed or filmed, especially to increase the transparency of our marketing contests. We carry out this processing of personal data on the basis of our legitimate interest to increase the credibility of our marketing competitions in the eyes of other competitors and to increase the attractiveness of these competitions. You can object to this processing.

o Retargeting: in some cases we use retargeting techniques and you have the right to opt-out of retargeting by clicking on this link and selecting the appropriate option.

- Improving our service: by using your order history and web behaviour, we can offer more relevant offers for additional goods, such as accessories for purchased products. We therefore display products in certain places that are right for you and match your needs and interests. We can also use tools for testing different variants (so-called A/B testing), Google Analytics, Facebook Analytics, etc. to optimize on-site and off-site elements (personalized advertising on third-party websites).

- Customer ratings of goods and services: after you purchase goods or services from us, you may be asked to rate them. You can also enter a rating on your own initiative.
- Call centre: if you contact us via our call centre (helpline), we will record your phone call with prior notice. Such recordings serve us to check the quality of service provided by our employees.

We process personal data on the following legal grounds

Performance and conclusion of a contract

We need a large part of your personal data in order to be able to enter into a purchase or other contract with you in relation to the goods or services you wish to purchase from us. Once the contract is concluded, we process your personal data in order to properly deliver the goods you have purchased or to properly provide you with the services you have purchased. On the basis of this legal basis, we therefore process primarily billing and delivery data.

Legitimate interests

We also use your personal data to provide you with relevant content, i.e. content that is interesting to you. On the basis of legitimate interest, we process personal data that we process automatically and cookies in particular in this way.

For the same legal reason, we can send you as our customers e-mail and SMS messages, push notifications via mobile app. The processing of your personal data on this legal basis also takes place in the monitoring carried out via cameras on our premises. In order to protect against the illegal distribution and disclosure of electronic content purchased by you, your name and surname and your address are displayed in this electronic content. If you are listed as a so-called authorized person of our corporate customer, your orders and other actions will be attributed to this corporate customer. If you do not wish to do so, please fill in an e-mail address other than the one listed as an authorized person of this corporate customer when placing an order, or you can ask us to delete you from the authorized persons of this corporate customer. If we process your personal data on the basis of this legal ground, you can object to this processing (see contact page > other > personal data > objection).

Consent

For the purposes of sending commercial communications (e-mail marketing) and telemarketing, we process your personal data on the basis of your consent. If you do not give us your consent and you are our customer, we may send you commercial communications (or call you in the context of telemarketing) without your consent. However, in any case, you can disable such marketing communications from us simply by (a) adjusting your user profile settings or (b) contacting us via our helpline at +420 737 777 222. If you give us your consent to the processing of your personal data, you can withdraw it at any time.

Transfer of personal data to third parties

In these cases, we transfer your personal data to third parties (i.e. we act as a data controller in relation to this personal data):

- **Delivery of goods:** the carrier you have chosen would never be able to deliver the goods you have ordered unless we have, among other things, provided them with details of where and to whom they are to deliver the goods. We will pass these details to the carrier according to how you fill them in on the order. The information so provided includes, in particular, your name and surname, the delivery address, a telephone number at which the carrier can contact you and, if the goods have not been prepaid, the amount to be paid on receipt of the goods, if any. The carrier is entitled to process the personal data we transmit to it only for the purpose of delivery of the goods and to delete the personal data without delay thereafter.

- **Delivery of goods stored by our contractual partner:** if you order goods from us that are in the warehouse of our contractual partner, we must complete the orderpass your personal data to this contractual partner who will process the order. The data thus transmitted includes, in particular, your name and surname, delivery address, a telephone number at which the carrier can contact you and, if the goods have not been prepaid, the amount to be paid on receipt of the goods, if applicable. The contractual partner must then pass on the personal data to the carrier who will deliver the goods, otherwise the carrier would not be able to deliver the goods to you. Both the contractual partner who stores the goods for us and the carrier are obliged, in relation to the personal data we pass on to them, to use this personal data only for the purpose of storing/delivering the goods and to delete it without delay thereafter.

- **Payment cards:** our company does not hold the details of the payment cards you use to pay with us (unless it is stored, see next paragraph below). Only a secure and competent banking institution holds your payment card details. If you have stored your payment card to speed up further purchases on our online shop, we only have incomplete information about your payment card (the first and last few digits of the payment card associated with your user account). If you wish to delete this data as well, simply visit your user profile settings and then simply delete the payment card details.

- **Verify the age of customers using Adulto.cz:** To simplify access to some of our services, such as verifying your age when purchasing age-restricted goods or services, we offer you the option to verify your identity using BankID or MojID. In this case, your personal data is transferred to the identification service provider, Internet Index Czech, s.r.o., ID: 05707218 and your bank.

- **Commercial communications:** in the case of sending commercial communications (e.g. by email or SMS) or telemarketing, we may use a third party to send the communications or make the telephone calls. This entity is bound by confidentiality obligations and may not use your personal data for any other purpose.

- **Product or service reviews via Heureka.cz or Zboží.cz:** In the case of sending purchase evaluation questionnaires, your data (e-mail address, information about the goods/services purchased) may be shared with the operator of the Heureka.cz portal (Heureka Group a.s.) or Zboží.cz (Seznam.cz, a.s.).

- **Exercise of rights and legal claims, governmental authorities:** in order to exercise our rights and legal claims (e.g. if you do not fulfil your obligations to TRAIVA - do not pay for the rental of the device, do not pay the remaining part of the purchase price, do not pay for the goods received or otherwise enrich yourself at TRAIVA's expense, etc.), we may also transfer your personal data to (i) collection agencies that assist us in collecting debts, (ii) companies that interested in purchasing TRAIVA's claim against you, (iii) the company that will purchase such claim (in case of assignment of the claim), (iv) a lawyer, or (v) a public authority. If we are required by law or a public authority (e.g. the Police of the Czech Republic) to transfer your personal data to them, we must do so.

- **Complaints:** in order to deal with your complaint more quickly and efficiently, the Service Centre may need further information about the fault, its manifestations or other relevant information. For this purpose, we transmit to the service centre to which we send the product you have complained about the data you have provided for the recipient of the complaint (i.e. mainly your name, address, telephone number, email).

How long do we process your personal data?

In the first instance, we will process your data for the duration of the contractual relationship between us. In the case of processing of personal data for which consent has been given, your personal data will generally be processed for a period of 7 years or until such consent is withdrawn. In the event that you subscribe to commercial communications, we will process your personal data for a period of 7 years, or until you have opted out of receiving further communications. You can easily express your opposition by editing your user profile settings or by calling our hotline at +420 737 777 222. We must process the personal data that are necessary for the performance of all our obligations, whether these obligations arise from a contract between us or from generally binding legal regulations, regardless of the consent you have given, for the period of time specified by or in accordance with the relevant legislation (e.g. for tax documents, this period is at least 10 years).

We process the data collected through the user account or in any other similar way for the duration of the use of our services and usually for 5 years after cancellation. Thereafter, only basic identification data and information on the reason for which the user account was cancelled or data forming part of operational backups are usually stored for a reasonable period of time. Cookies: we delete cookies involving user behaviour after 30 days, with the older data being available in anonymised form in Google Analytics. We store your camera footage for 90 days as standard. If an illegal act occurs in the monitored area, we may contact the police and hand over the records to the relevant authority (police, court, etc.). In this case, the records are not deleted after 90 days, but for evidentiary reasons we keep them until the final conclusion of the case.

Security of personal data

Your personal data is safe with us. To prevent unauthorised access and misuse of your personal data, we have put in place appropriate measures, both technical and organisational. At TRAIVA, we care deeply about the protection of your personal data. That is why we not only regularly check their security, but also continuously improve their protection. All communication between your device and our web servers is encrypted. Login credentials are hashed and all your data is stored only on servers in secure data centers with limited, carefully controlled and audited access. We strive to use security measures that provide sufficient security in light of the current state of technology. The security measures adopted are then regularly updated.

What rights you have in relation to the protection of your personal data

In relation to your personal data, you have in particular the right to withdraw your consent to the processing of your personal data at any time, the right to rectify or supplement your personal data, the right to request the restriction of its processing, the right to object to or complain about the processing of your personal data, the right to access your personal data, the right to request the transfer of your personal data, the right to be informed of a breach of security of your personal data and, under certain conditions, the right to erasure of certain personal data that we process in relation to you (so-called "erasure"). right to be "forgotten").

Modification and completion

You are in control of your personal data primarily through your user account. Here you can delete or change basic information about you and change your settings regarding the receipt of commercial communications (or unsubscribe from commercial communications), etc.

Correction

If you believe that the personal data we process about you is incorrect, you can contact us by email. However, in order to speed up the correction of your personal data and for your convenience, we recommend that you edit your personal data in your user profile.

According to the amendment to Act No. 235/2004 Coll., on value added tax, it is not possible to change data in an invoice already issued as of 1 January 2013. The data on the invoice can only be changed if you have not yet received and paid for the goods.

Access (portability)

You can ask us to send you an overview of your personal data. If you have a user account with us, you will find this information directly in your profile. If you do not have a user account with us, please contact us by email. You also have the right to access this information regarding your personal data:

- What are the purposes of processing your personal data
- What are the categories of personal data concerned
- Who, other than us, are the recipients of your personal data
- The intended period for which your personal data will be stored
- Whether you have the right to request us to rectify or erase your personal data or to restrict or object to the processing of your personal data
- Information about the source of the personal data if we did not obtain it from you

Delete

You can also request that we delete your data (however, deletion will not affect data on documents that we are required by law to keep (e.g. invoices or credit notes). If we need your personal data to establish, exercise or defend our legal claims, your request may be refused (e.g. if we have an outstanding claim against you or if there is an ongoing complaint procedure). Please note that your payment card information is not stored with our company but with the

payment gateway provider (third party) when you make a payment without storing your payment card. Therefore, this data cannot be deleted from our side and you need to contact the payment gateway through which you made the payment. Only basic payment card information is stored with our company in case you store your payment card with us. Except as stated above, you have the right to erasure in the following cases:

- a. The personal data is no longer necessary for the purposes for which it was processed
 - b. You have withdrawn your consent on the basis of which the data was processed and there is no further legal basis for processing it
 - c. You have objected to the processing of the personal data and you consider that, on assessment of the objection, it appears that in the particular situation your interest outweighs our interest in processing the personal data
 - d. The personal data are processed unlawfully
 - e. The obligation to erase is provided for by a specific legal regulation
 - f. It is personal data of children under 16 years of age
- Objection** We process some of your personal data on the basis of our legitimate interest (see the section of this policy entitled "We process personal data on these legal grounds"). If there are specific grounds on your side, you may object to the processing of this personal data about you. You can object to this by e-mail.

Restrictions on processing

If (a) you contest the accuracy of your personal data, (b) your personal data is being processed unlawfully, (c) we no longer need your personal data for the purposes of processing but you need it for the establishment, exercise or defence of your legal claims, or if you (d) have raised an objection under the previous paragraph, you have the right to have us restrict the processing of your personal data. In this case, we can only process your personal data with your consent (except for the storage or backup of the personal data in question).

Lodging a complaint

If you believe that we are processing your personal data unlawfully, you also have the right to lodge a complaint with the relevant supervisory authority. However, we will be happy if you address the transgressions with us first. You can always contact us easily via our email or via our hotline at +737 777 222. These Privacy Policy are valid and effective as of 01.01.2024 and are available electronically at www-e-safetyshop.eu and in case of using the mobile app in the contact section.