

PRINCIPLES OF THE PROCESSING OF PERSONAL DATA

The goal of the Principles of the Processing of Personal Data relating to mluvii customers published by mluvii.com s.r.o. organisation ID 27405354, tax no. CZ27405354, registered office Za Brumlovkou 266/2, 140 22 Praha 4 - Michle (hereinafter referred to as „Principles“ and „mluvii“) is to inform the visitors to mluvii website of how, for what purpose and for how long the company is processing their personal data in compliance with the respective laws and regulations, to whom the data can be transferred and what can be the purpose. Also, the Principles should inform the potential customers of all rights they have in conjunction with the processing of their personal data.

The Principles apply to the processing of personal data of the potential customers and, to a reasonable extent, the potential customers' representatives and contact people, people interested in mluvii services and visitors to mluvii website (hereinafter referred to as “potential customer/s” or “user”) in an extent corresponding with their position toward mluvii.

The Principles comply with the regulation adopted by the European Parliament and the European Council (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter: „GDPR“) whereas mluvii acts as data controller pursuant to Article 13 hereof.

A. Categories

Personal data means all information that identifies or has the potential to identify a specific natural person. Based on the above, during the processing of its service mluvii may process the following categories of personal data:

1. Basic personal identification data and contact details

Data on an initial form prior to starting a session include namely:

- first name and surname
- phone number
- e-mail

2. Data about the communication between mluvii and a potential customer

This type of data occurs when communicating with the potential customer. It includes written (paper) and electronic communication and records of chats between the potential customer and mluvii.

3. Data requiring your consent

The processing of such data is not a must for the fulfilment of contractual terms and conditions. It is not required by any law or regulation or needed for the protection of mluvii's legitimate rights. Yet, the processing of such data

improves the quality of service, enhances the focus on the needs of the potential customers and/or informs the potential customers about products and services made specifically for a particular customer segment. The data will be processed solely after receiving approval from the customer for a period stated herein. This primarily includes:

- records of customer behaviour on the mluvii websites acquired through cookies (if cookies are approved in the browser) processed in order to enhance the quality of mluvii website/s and online ads and commercials.

B. Goal, legal purposes and time of processing personal data

The scope of the processed data depends on the purpose. In some cases, the data may be processed based on a contract, to protect some legitimate company interests or when defined by law without a consent. In other cases, the processing of the data requires a consent from the affected party.

1. Processing of data to meet the obligations arising from the contract, legal duties and on the grounds of the company's legitimate interests

The disclosure of personal data needed for the fulfilment of the contract, in order to meet legal duties and to protect mluvii's legitimate interests is obligatory. The absence of such personal data would not enable us to provide the service. The processing of this type of personal data is not conditioned by the customer's consent yet each customer shall have the right to object against the processing of personal data for the purposes of mluvii's legitimate interests. On the contrary, the processing of personal data for the purposes of meeting the contract and legal duties cannot be refused.

This specifically includes the sub-purposes:

- Targeting of potential customers (legitimate interest)
- processes related to the identification of potential customers (fulfilment of contract)

In the case of contractual negotiations between mluvii and a potential customer not resulting in the signing of a contract, mluvii may continue processing the personal data for a period of 3 (three) months from the respective negotiation date.

2. Processing of cookies on a website operated by mluvii

Information about customer behaviour acquired from cookies on the mluvii website approved by user when using an internet explorer is used in order to enhance the quality of mluvii website and for the purposes of online advertising.

C. Categories of other personal data recipients

To meet its duties and obligations arising from the contracts, mluvii uses professional and specialist services from various third parties. If the third parties (suppliers) process personal data received from mluvii their act as “data processor”, which means that they can process the data solely under the instructions from mluvii. This duty primarily applies to various experts, solicitors, auditors, IT administrators, online advertisers or commercial representatives. Mluvii carefully selects each supplier and enters with all into a contract for the processing of personal data. The contract strictly defines all duties to ensure adequate safety of personal data. The list of all suppliers is available upon request.

Our suppliers include organisations having registered offices in the Czech Republic and the EU countries or other countries seen as “safe”. In countries beyond the European Union, the transport and processing of personal data are governed by the applicable legislature.

D. Methods of processing personal data

Mluvii processes personal data either manually or automatically. Mluvii keeps track of all activities, both manual and automated, used for the processing of personal data.

E. Commercial communication

Mluvii does not distribute commercial communication to its potential customers.

F. Information on the rights of subjects related to the processing of personal data

Each data subject identified or identifiable by mluvii as a natural person has the below rights. The rights must be exercised in a way specified for each concrete right. The rights may also be exercised in the case it is clear that a particular set of data belongs to a particular data subject.

1. Right to access personal data

Under 15 GDPR, each data subject shall have the right to access its personal data which includes the following:

- obtain a confirmation of personal data processing,
- be informed on the purpose of processing your personal data, the category of affected data, the recipients allowed to access your personal data (past and future) as well as the time of processing personal data. Other rights include the right of rectification (correction) or deletion of some personal data related to a data subject, to place restrictions or object against such processing, to escalate the case to a supervisory body, to receive full information about the source of personal data (unless acquired from the data subject), to be informed that the decision-making is an automated process incl. profiling and to obtain relevant guarantees in the event of transferring personal data beyond the EU zone,

- receive a copy of all personal data unless this adversely affects the rights and freedoms of other entities.

The right to get the confirmation and information of the processing of personal data can be exercised in writing incl. certified signature at the address of mluvii. The request must contain full name, email and phone number used by the user when first registering at mluvii website.

2. Right to rectification

Pursuant to Article 16 GDPR, each data subject shall have the right to ask for the rectification of inaccurate personal data concerning him or her to be processed by mluvii. Applications for the rectification can be sent by email to gpr@mluvii.com, incl. relevant evidence. The request must contain full name, email and phone number used by the user when first registering at mluvii website.

3. Right to erase („right to be forgotten“)

Pursuant to Article 17 GDPR, each data subject shall have the right to ask for the erasure of all personal data concerning him or her unless mluvii proves that the ground for the processing is lawful. If the data subject suspects that the personal data has not been deleted he or she may apply for the erasure by posting a written request incl. certified signature to the address of mluvii's registered office. The request must contain full name, email and phone number used by the user when first registering at mluvii website.

4. Right to restriction of processing

Pursuant to Article 18 GDPR, the data subject shall have the right to obtain from the data controller restriction of processing for a period needed for resolving the case if the data subject challenges the accuracy of the data or the grounds for the processing of the data or, objects by posting a written request incl. certified signature to the registered office of mluvii. The request must contain full name, email and phone number used by the user when first registering at mluvii website

5. Right to be notified of any rectification or erasure of personal data or restriction of processing

Pursuant to Article 19 GDPR, each data subject shall have the right to be notified by mluvii in the case of any rectification or erasure of personal data or restriction of processing carried out in accordance with Articles 16 - 18 communicated to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The data controller shall inform the data subject about the recipients if requested by the data subject.

6. Right to data portability

Pursuant to Article 20 GDPR, each data subject shall have the right to receive from mluvii all personal data concerning him or her, which he or she has provided to a data controller, in a structured, commonly used and

machine-readable format and have the right to transmit this data to another data controller provided that this data controller appoints a competent authorised person acting on behalf of the data controller.

Should the performance of this right adversely affect the rights and freedoms of third parties the request shall not be satisfied. Users can send their requests by email to gdpr@mluvii.com incl. relevant evidence. The request must contain full name, email and phone number used by the user when first registering at mluví website.

7. Right to object

Pursuant to Article 21 GDPR, the data subject shall have the right to object to the processing of his or her personal data on the grounds of mluví's legitimate interests.

Based on the objection, mluví shall, without undue delay, stop processing the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject. Users can send their objections in writing incl. a certified signature to mluví's registered address.

The processing of data from cookies can be restricted by setting the web browser.

8. Automated individual decision-making incl. profiling

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling which produces legal effects concerning him or her or similarly significantly affects him or her. Mluví states not to make decisions potentially affecting the data subjects in an automated manner without using human judgements.

9. Right to escalate the case to the Office for Personal Data Protection

Each data subject may escalate the case to the Office for Personal Data Protection (www.uoou.cz).