

PRINCIPLES OF PERSONAL DATA PROCESSING

(these principles are hereinafter also referred to as “**Principles**”)

I.

THE PURPOSE OF THE PRINCIPLES

- 1.1. The purpose of these Principles is to meet the information obligation against the customers (hereinafter also referred to as “**Subject**”) resulting from the Directive 2016/679 of the European Parliament and Council (EU) of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on free movement of such data and on repealing the Directive 95/46/ES (General directive on personal data protection, hereinafter also referred to as “**GDPR**”).

II.

THE CONTROLLER

- 2.1. Colonia press, a.s., with its registered office in Kolín IV, Havlíčkova 844, post code 28000, ID: 26186292, registered at the Municipal Court in Prague under the reference number B 6634 is the Controller¹ (hereinafter also referred to as the “**Controller**”), who is also a contractual partner of the Subject.
- 2.2. If needed, the Controller may be contacted via email: gdpr@cogniapress.com.

III.

PERSON AUTHORIZED FOR THE PERSONAL DATA PROTECTION

- 3.1. The Controller authorized a person, Ms. Nikola Bíbrová, to protect the personal data. Ms. Bíbrová may be contacted via email: gdpr@cogniapress.com.

IV.

INFORMATION ON PROCESSING

- 4.1. The Controller is obliged to provide the employees with various information on processing, particularly with the purpose of processing, legal grounds for processing and retention period regarding the personal data. This obligation of the Controller is fulfilled by means of tables included in the Appendix no. 1.
- 4.2. Any persons engaged by the Company in the processing of personal data shall meet the GDPR requirements.
- 4.3. All the employees of the Controller shall maintain confidentiality on any personal data to be processed as part of the work activities performed for the Controller.

¹ The term “Controller” refers to a natural or legal person, public authority, agency or other subject that defines, individually or in cooperation with others, the purposes and means for processing of the personal data. Provided the purposes and means of the processing are specified by the laws of the EU or other member state, the right may define the relevant Controller or special criteria for its specification.

V.

PERSONAL DATA SECURITY – TECHNICAL AND ORGANIZATIONAL MEASURES

- 5.1. Technical and organizational measures are stated in table included in Appendix no. 1. 2

VI.

RIGHTS OF THE SUBJECTS

- 6.1. The Subject is entitled to exercise the below mentioned rights against the Controller in the extent and under the conditions defined in GDPR, Chapter III.
- 6.2. The Subject has the following rights:
 - 6.2.1. Right of access to personal data by the Subject: You have the right to obtain from the Controller a confirmation whether the Controller processes personal data related to you. Provided your personal data are processed, you are entitled to gain access to such data. This access may include e.g. information on the purpose of processing, categories of personal data and information on the source of personal data. In addition, you are entitled to require a copy of the personal data processed.
 - 6.2.2. Right to rectification: You have the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning you, which are processed by the Controller.
 - 6.2.3. Right to erasure: Provided any of the reasons specified by GDPR occurs (e.g. the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed or your consent is withdrawn), you have the right to obtain from the Controller the erasure of personal data concerning you without undue delay. This right is not applicable without restriction. Data are erased, e.g. in case data are processed based on legal obligation.
 - 6.2.4. Right to restriction of processing: You have the right to obtain from the Controller restriction of processing in cases specified by GDPR. For example, it regards a situation when the accuracy of the personal data is contested by you, for a period enabling the Controller to verify the accuracy of the personal data.
 - 6.2.5. Right to data portability: In some cases, specified in GDPR (e.g. the processing is based on your consent), you have the right to receive your personal data from the Controller in a structured, commonly used and machine-readable format and have the right to transmit those data to another Controller. You also have the right to have the personal data transmitted directly from one Controller to another, where technically feasible.
 - 6.2.6. Right to object: You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you provided the processing is necessary for the performance of a task carried out for reasons of public interest or exercise of public authority or legal interests of the Controller or a third party, including profiling based on these provisions. You have the right to object to processing of personal data concerning you for the purposes of direct marketing.
 - 6.2.7. Automated individual decision-making, including profiling: You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. This right shall not apply in all cases, e.g. provided the decision is necessary for entering into, or performance of, a contract between you and the Controller.

VII.

RIGHT TO WITHDRAW THE CONSENT AT ANY TIME

- 7.1. In case the processing of personal data is based on your consent, you may withdraw such consent at any time. Data processed based on your consent may be perceptible in tables included in the Appendix no. 1.
- 7.2. Withdrawal of consent as well as its award is your freedom of choice and the Controller shall not force you to such behaviour or take any disciplinary action against you. However, the withdrawal of consent has no effect on the legality of processing before the withdrawal (i.e. withdrawal has no retroactive effect).

VIII.

COMPLAINTS

- 8.1. You have the right to file a complaint regarding the processing of your personal data at any time to our officer responsible for the protection of personal data or a person authorized for the personal data protection, according to data stated in 3.1.
- 8.2. You have also right to file a complaint regarding the processing of your personal data to a supervisory authority, which is, for the Controller, the Office for Personal Data Protection, Pplk. Sochora 27, 170 00 Prague 7.

IX.

SENDING EMAILS, SMS, MMS AND COMMERCIAL COMMUNICATION

- 9.1. The Subject agrees to be sent **(i)** emails to an address provided by the Subject; **(ii)** SMS/MMS messages to telephone numbers provided by the Subject; **(iii)** mails and marketing materials to addresses provided by the Subject and related to any tasks, events or facts in connection to the activities of the Controller.
- 9.2. The Subject explicitly agrees that the Controller may use the contact details included in the Article 9.1 also for the purposes of sending commercial communication that is not directly related to the contractual relations with the Controller, however, is related to other product or service provided by the Provider or the Provider itself. The Subject is entitled to withdraw the consent at any time, e.g. by the procedure given in the provided commercial communication.

X.

PROVISION OF PERSONAL DATA ON YOUR PART

- 10.1. If the provision of personal data is obligatory, the processing is stated in the tables according to the Article 4.1.
- 10.2. In case the provision of personal data by your part is a legal requirement, you are obliged to provide such personal data. The same situation occurs if you are obliged to provide the personal data based on an agreement concluded between you and our Company. Provided the provision of personal data is obligatory and you fail to provide such data, it may have consequences stated in the respective legal regulation or contract.

XI. USE OF COOKIES

- 11.1. Cookies are text files containing small amount of information saved in your computer from any web page that you visit. Whenever you visit the web page again, the cookie files are sent back to the original web page or other page that recognizes the cookies. These files enable identification of the equipment and correct display of a web page to the users, while customizing the page to the individual preferences of the users.
- 11.2. Types of cookies used
- 11.2.1. Necessary
- Necessary cookie files are used for the proper functioning of web pages. They remember the choices you have made as well as other information, so that you do not have to enter such information repeatedly.
- 11.2.2. Analytical
- Such files are used to understand how the website visitors use the pages and how they comprehend them. Accordingly, the pages may be optimized with regard to the user needs to be as user-friendly as possible. We use Google Analytics.
- 11.3 In case you wish to reject or remove cookie files, you may do so in your computer. Rejecting the files will, however, have an adverse effect on the use of your website and the website of others.

XII. FINAL PROVISIONS

- 12.1. These Principles come to effect on the date of their publication.

Appendices: Appendix no. 1 – Table applied to meet the information obligation

On behalf of the Controller in Kolín, on 17. 4. 2018



Václav Dřížhal
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