

Information on the processing of personal data COGVIO

1. Introductory provisions

- 1.1. This Information on the processing of personal data ("**Information**") is a document that serves to fulfil the information obligation within the meaning of Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council 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, and repealing Directive 95/46/EC (General Data Protection Regulation) ("**GDPR**").
- 1.2. This Information serves to provide all information on the processing of personal data of data subjects who use the COGVIO Software or are an Authorized Person within the meaning of the Contract concluded between the Customer and COGVIO.
- 1.3. Unless otherwise indicated, all capitalized terms shall have the meaning defined in the Agreement.

2. Controller, Data protection officer and contacts

- 2.1. The Controller of personal data is the operator of the Software, the company Cogvio, s.r.o., with its registered office at Sudoměřská 1413/2, Žižkov, 130 00 Prague 3, Czech Republic, ID No.: 062 19 799, registered in the Commercial Register maintained by the Municipal Court in Prague, file No. C 277493 ("**COGVIO**").
- 2.2. COGVIO is also a processor of personal data on the basis of a written personal data processing clause, for its clients, customers using the COGVIO Software for the provision of related services where access to and processing of personal data of Software users is necessary.
- 2.3. COGVIO contacts:
 - 2.3.1. By post COGVIO, Sudoměřská 1413/2, Žižkov, 130 00 Prague 3.
 - 2.3.2. Electronically gdpr@cogvio.com.

3. Performance of the Contract

- 3.1. Purpose: for the purpose of recording the concluded contract between the client using the Software and COGVIO, for the purpose of the use of the Software by all authorized users of the Software on behalf of the client, for the purpose of ensuring the performance of the concluded contract, for the purpose of making claims or complaints for the duration of the contract, COGVIO stores the necessary data. Information on the processing of personal data of all users of the Software when using the Software and other COGVIO applications is available in the following article.
- 3.2. Legal basis for processing: performance of the contract, the provision of data is voluntary, but without the provision of data, it is not possible to conclude a contract between the client and COGVIO for the use of the Software and the provision of other services.
- 3.3. Categories of personal data concerned: identification data, contact data, contract and data relating to the services used, data of all users on behalf of the client, communications, requests made and all data necessary for the performance of the contract, use of the services and the Software.
- 3.4. Recipients of the personal data: only contractually mandated processors from the following categories: suppliers of technical solutions, IT services, auditors, legal services, accounting services.
- 3.5. Transfer of personal data to a third country outside the EU: information is available at www.cogvio.com/terms.
- 3.6. Period for which personal data will be stored: for the duration of the contract and longer only if the legitimate interest according to this Information or the legal obligation of the COGVIO so requires.
- 3.7. Data source: the client's authorized person.

4. Use of Software

- 4.1. Purpose: user accounts are established for the purpose of using the Software, without which it is not possible to use the Software. We process your personal data for the purpose of providing you with the possibility to use the Software and a user account. The processing includes the storage of data in the Software, its use and modification. The purpose is to enable you to use the individual services you have selected, to maintain the services and your preferred settings, to store the outputs in the system and to be able to work with and return to the outputs, to provide you with any information you require, to ensure the operation of the Software and to troubleshoot errors. The purposes also include ensuring data security and protection, including the implementation of new features. Last but not least, we also provide you with technical and customer support.
- 4.2. Functioning of the user account: the creation of a user account occurs by concluding a contract with the user account being inactive. The user is obliged to activate the user account by registering within the Software interface. Within the registration, the User fills in an e-mail and a password. The User undertakes to propose a secure password. The registration is completed by pressing the confirmation button. The User is obliged to comply with the applicable legislation, the rights of third parties and the contract when using the User Account. If this is not complied with, COGVIO is entitled to cancel the user account without further delay. Cancellation of the user account may be requested by the User and the Authorized Person.
- 4.3. Legal basis for processing: performance of the contract, the provision of data is voluntary, however, without the provision of data it is not possible to use the Software and related services.
- 4.4. Categories of personal data concerned: user identification and contact data, data relating to the services used, user settings, user outputs and requests made, data relating to products monitored and filtering criteria, server and communication logs, data entered within the Software and all related communications and data necessary for the use of the Software and the user account.
- 4.5. Recipients of the personal data: only contracted processors from the following categories: suppliers of technical solutions, IT services, auditors, legal services, accounting services.
- 4.6. Transfer of data to a third country outside the EU: information is available at www.cogvio.com/terms.
- 4.7. Period for which the personal data will be stored: for the duration of the contract and longer only if the legitimate interest according to this Information or the legal obligation of the COGVIO so requires.
- 4.8. Data source: the user.

5. Legitimate interests of COGVIO in direct marketing

- 5.1. Purpose: Unless refused at registration, COGVIO carries out direct marketing to its customers by sending selected commercial communications by electronic means on the basis of a statutory exemption under the Act on Certain Information Society Services. The commercial communications include only the offer of similar products/services.
- 5.2. Legal basis for processing: the legitimate interest of COGVIO in carrying out direct marketing to its customers. You have the right **to object to this legitimate interest and the performance of direct marketing at any time** and the activity will be terminated immediately.
- 5.3. Categories of personal data concerned: identification and contact data, data on user preferences and activity, logs relating to the implementation of direct marketing and sent commercial messages and related communications.
- 5.4. Recipients of the personal data: only contracted processors from the following categories: suppliers of technical solutions, IT services, auditors, legal services, accounting services.
- 5.5. Transfer of data to a third country outside the EU: information is available at www.cogvio.com/terms.

- 5.6. The period for which the personal data will be stored: The data collected in this way is stored by COGVIO for an indefinite period of time, or for as long as a legitimate interest exists, but no longer than the user objects, requests to stop direct marketing or receiving commercial communications, and longer only if a legitimate interest under this Information or a legal obligation of COGVIO so requires.
- 5.7. Data source: the subject or the Authorized Person on behalf of the client.

6. Legitimate interest in carrying out statistics

- 6.1. Purpose: for the purposes of system development, debugging, provision of new features and for internal statistics, we anonymize data on the use of the Software and create anonymous statistics on the use of individual features.
- 6.2. Legal basis for processing: legitimate interest in providing internal anonymous statistics. **You can object to the legitimate interest at any time.**
- 6.3. Category of personal data concerned: data relating to the use of services.
- 6.4. Recipients of the personal data: only contracted processors from the following categories: suppliers of technical solutions, IT services, auditors, legal services, accounting services.
- 6.5. Transfer of data to a third country outside the EU: information is available at www.cogvio.com/terms.
- 6.6. The period for which the personal data will be stored: the data is converted on a monthly basis into an anonymous form from which it is not possible to retrospectively identify a specific person, even using other means.
- 6.7. Data source: the user.

7. Google Analytics

- 7.1. Purpose: for the purposes of system development, debugging, providing new features and for internal statistics, we use the statistical functions of Google Analytics if you agree as a user. More information about the tool is available at the following link: <https://support.google.com/analytics/answer/6004245?hl=cs>.
- 7.2. Legal basis for processing: voluntary consent of the user, which can be withdrawn at any time.
- 7.3. Category of personal data concerned: data relating to the use of services.
- 7.4. Recipients of the personal data: Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland. Google Analytics Terms of Service: <https://www.google.com/analytics/terms/gb.html>, General Overview of the Google Analytics Security and Privacy Policy: <https://support.google.com/analytics/answer/6004245?hl=en>, as well as Google's Privacy Policy: <https://policies.google.com/privacy?hl=en>; furthermore, only contractually authorised processors in the following categories have access to the data: technical solution providers, IT services, auditors, legal services, accounting services.
- 7.5. Transfer of data to a third country outside the EU: **Transfer to third countries is possible.** As an appropriate protection, we have concluded standard contractual clauses according to Article 46 GDPR, specific information is available at www.cogvio.com/terms.
- 7.6. The period for which the personal data will be stored: the data is converted on a monthly basis into an anonymous form from which it is not possible to retrospectively identify a specific person, even using other means.
- 7.7. Data source: the user.

8. COGVIO's legitimate interests in protecting rights and demonstrating compliance

- 8.1. Purpose: If the COGVIO carries out the above processing, it collects a limited range of documents and personal data after the completion of the processing in order to protect its own rights, to defend itself against claims and also to defend itself in judicial/administrative/inspection and other proceedings.

- 8.2. Legal basis for processing: the legitimate interest of the COGVIO in protecting its rights, proving compliance and defending itself against supervisory authorities. **You have the right to object to this legitimate interest at any time.**
- 8.3. Categories of personal data concerned: documents evidencing legal actions such as consents granted, relevant logs, requests sent to exercise rights, etc.
- 8.4. Recipients of the personal data: only contracted processors from the following categories: suppliers of technical solutions, IT services, auditors, legal services, accounting services.
- 8.5. Transfer of data to a third country outside the EU: information is available at www.cogvio.com/terms.
- 8.6. The period for which the personal data will be stored: The COGVIO shall retain the data so collected for a period of 3 years from the expiry of the processing period set for other purposes under this Policy. The period shall not expire before the commencement of legal or other proceedings and the related time limits for remedial measures.
- 8.7. Data source: the subject.

9. Fulfilling legal obligations

- 9.1. Purpose: Where the COGVIO is required by an effective legal provision to store specific documents, it does so for the purpose set out in that legal provision. An example is the storage of documents in the field of accounting and taxation.
- 9.2. Legal basis for processing: performance of a legal obligation.
- 9.3. Categories of personal data concerned: only such data or documents whose storage is required by specific legislation.
- 9.4. Recipients of the personal data: only contracted processors from the following categories: suppliers of technical solutions, IT services, auditors, legal services, accounting services.
- 9.5. Transfer of data to a third country outside the EU: information is available at www.cogvio.com/terms.
- 9.6. The period for which the personal data will be stored: The COGVIO will keep the data collected in this way only for the period of time specified by the relevant legislation.
- 9.7. Data source: the subject.

10. Rights of data subjects and methods to exercise rights

- 10.1. To ensure a sufficient level of security of processing and protection of personal data, the COGVIO has adopted appropriate technical and organizational measures that follow the current development of technical means that contribute to the security of personal data processing, in particular to prevent unauthorized access to, theft or misuse of personal data.
- 10.2. In all processing of personal data, the user, as the data subject, has the rights guaranteed by this Article.
- 10.3. The right of access to personal data - the right to have COGVIO provide you without undue delay with information on which of your personal data is processed, the purpose, recipients, time period and a notice of rights.
- 10.4. The right to rectification - the right to have inaccurate personal data corrected or missing personal data completed by COGVIO without undue delay.
- 10.5. The right to erasure ("right to be forgotten") - the right to have COGVIO erase personal data concerning you without undue delay.
- 10.6. The right to restriction of processing of your personal data - the right of the user to have COGVIO restrict the processing if the requirements of Article 18 of the GDPR are met (for example, the accuracy of the data is contested, an objection has been raised, etc.).
- 10.7. The right to data portability - the right to obtain personal data concerning you that you have provided to COGVIO and that are processed by automated means on the basis of your consent or contract, in a structured, commonly used and machine-readable format, the right to

transmit these data to another controller and the right to have the personal data transmitted directly to the other controller, if technically feasible.

- 10.8. The right to object to the processing of personal data concerning you. COGVIO does not further process personal data unless it can demonstrate compelling legitimate grounds for the processing which override your interests or rights and freedoms or for the establishment, exercise or defence of legal claims. If personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such purposes, which includes profiling. If you object to such processing, your personal data will no longer be processed for these purposes.
- 10.9. The right to lodge a complaint with the supervisory authority, which is the Personal Data Protection Office, located at Pplk. Sochora 727/27, 170 00 Prague 7 - Holešovice, www.uoou.cz.
- 10.10. You have the right not to be subject to any decision based solely on automated processing, including profiling, which has legal effects concerning you or similarly significantly affects you. COGVIO does not base any of its decisions solely on automated processing.
- 10.11. At any time, you can request the partial or complete deletion or blocking of your personal data free of charge, or request information about your personal data stored with us and request the correction of such data. You do not need to use any specific form for this purpose, just contact us at the above-mentioned contacts.
- 10.12. We will process all your requests without undue delay, in justified cases within 30 days at the latest.
- 10.13. In the event of exercising your rights as a data subject vis-à-vis COGVIO as the controller or in the event of any requests, questions or complaints regarding the processing of personal data, please use our contacts above.

11. Final provisions

- 11.1. The processing of personal data is governed by the law of the Czech Republic.
- 11.2. This Information is effective from 1 September 2023.
- 11.3. COGVIO has the right to change the Information if necessary. The amendment shall be effective on the date of notification or on a later date specified in the notice of amendment.
- 11.4. This Information is available at www.cogvio.com/terms.