

# Privacy Policy

## I. Basic Provisions

1. The controller of personal data, in accordance with Article 4, point 7 of the European Parliament and Council Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and the free movement of such data (hereinafter: "GDPR"), is Just4Device s.r.o., Company ID: 17970687, registered office: Korunní 2569/108, Vinohrady, Prague 10 (hereinafter: "controller").

2. The contact details of the controller are:

- Address: Korunní 2569/108, Vinohrady, Prague 10
- Email: [info@just4device.com](mailto:info@just4device.com)

3. Personal data refers to all information about an identified or identifiable natural person; an identifiable natural person is one who can be directly or indirectly identified, in particular by reference to an identifier such as name, identification number, location data, network identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

4. The controller has not appointed/has appointed a data protection officer. The contact details of the officer are:

## II. Sources and Categories of Processed Personal Data

1. The controller processes personal data that you have provided to them, or personal data that the controller has obtained based on the fulfillment of your message:

- Name and surname
- Email address
- Phone number

2. The controller processes your identification and contact details, and data necessary for the fulfillment of the contract.

## III. Legal Basis and Purpose of Processing Personal Data

1. The legal basis for processing personal data is:

- The fulfillment of the contract between you and the controller according to Article 6(1)(b) GDPR,
- The fulfillment of a legal obligation of the controller according to Article 6(1)(c) GDPR,
- The legitimate interest of the controller in providing direct marketing (e.g., sending commercial communications and newsletters) according to Article 6(1)(f) GDPR,

- Your consent to processing for the purposes of providing direct marketing (e.g., sending commercial communications and newsletters) according to Article 6(1)(a) GDPR in conjunction with Section 7(2) of Act No. 480/2004 Coll., on Certain Information Society Services, in the case where no goods or services were ordered.

1. The purpose of processing personal data is:
  - To fulfill your order and perform rights and obligations arising from the contractual relationship between you and the controller; when placing an order, personal data is required, which is necessary for the successful completion of the order (name, address, contact information). Providing personal data is a necessary condition for concluding and fulfilling the contract,
  - To fulfill legal obligations toward the state,
  - To send commercial communications and carry out other marketing activities.
2. The controller performs automated individual decision-making under Article 22 GDPR. You have given explicit consent to such processing.

#### **IV. Data Retention Period**

1. The controller retains personal data:
  - For the duration necessary to perform the rights and obligations arising from the contractual relationship between you and the controller and for the assertion of claims from these contractual relationships (for 15 years from the termination of the contractual relationship),
  - For the period until consent for processing personal data for marketing purposes is withdrawn, but no longer than 5 years, if personal data is processed based on consent.
2. After the retention period, the controller will delete personal data.

#### **V. Recipients of Personal Data (Subcontractors of the Controller)**

1. Recipients of personal data are persons:
  - Involved in the delivery of goods/services/payment execution based on the contract,
  - Providing services related to the operation of the e-shop and other services related to the operation of the e-shop,
  - Providing marketing services.
2. The controller does not intend to transfer personal data to a third country (outside the EU) or an international organization. Recipients of personal data in third countries are providers of mailing services/cloud services.

#### **VI. Data Processors**

1. Personal data processing is performed by the controller, but personal data may also be processed by the following processors:
  - Any additional provider of processing software and services or applications, which are not currently used by the controller.

#### **VII. Your Rights**

1. Under the conditions set out in the GDPR, you have:
  - The right to access your personal data according to Article 15 GDPR,
  - The right to rectify personal data according to Article 16 GDPR or restrict processing according to Article 18 GDPR,
  - The right to erase personal data according to Article 17 GDPR,
  - The right to object to processing according to Article 21 GDPR,
  - The right to data portability according to Article 20 GDPR,
  - The right to withdraw consent to processing in writing or electronically to the address or email of the controller provided in Article III of these terms.
2. You also have the right to lodge a complaint with the Office for Personal Data Protection if you believe your right to personal data protection has been violated or to approach the court.

### **VIII. Security Measures for Personal Data**

1. The controller declares that appropriate technical and organizational measures have been taken to secure personal data.
2. The controller has implemented technical measures to secure data storage and storage of personal data in physical form, especially with passwords.
3. The controller declares that only authorized persons have access to personal data.

### **IX. Final Provisions**

1. By submitting an order through the online order form, you confirm that you have read the privacy policy and accept it in its entirety.
2. By checking the consent box via the online form, you confirm that you have read the privacy policy and accept it in its entirety.
3. The controller has the right to modify these terms. The new version of the privacy policy will be published on its website, and you will receive the new version of the policy via the email address you provided.

These terms are effective from March 20, 2025.