

Business company

KARIMPOL INTERNATIONAL, s.r.o.

Company ID: 45804451

with the registered office at Rohanské nábřeží 671/15, Karlín, 186 00 Prague

This Policy comes into effect on 24 September 2019.

Contact details:

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Personal data are processed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (hereinafter referred to as “**Regulation**”), the Personal Data Processing Act and Act No. 480/2004 Coll. on Certain Information Society Services, as amended.

1. Definitions

Data Subject: A natural person (consumer or self-employed) to whom the personal data relate (hereinafter referred to as “**You**” or “**Customer**”);

Personal Data: Any information about an identified or identifiable customer; an identifiable customer is a natural person who can be identified, directly or indirectly, in particular by reference to a particular identifier, such as name, identification number, location data, network identifier or one or more specific physical, physiological, genetic, psychological, economic, cultural or social identity elements of this individual (hereinafter referred to as “**Data**” or “**Information**”);

Controller: An entity that determines the purpose and means of processing personal data, carries out processing and bears responsibility for such processing. A controller of personal data is KARIMPOL INTERNATIONAL, s.r.o., IČO: 45804451 (hereinafter referred to as “**We**”);

Processor: An entity that processes personal data for the Controller, by law or under the authority of the Controller, based on an agreement on personal data processing (hereinafter referred to as “**Business Partner**” or “**Partner**”);

Website: the website available at <https://karimpol.com>;

Purpose of Personal Data Processing: A reason why personal data are processed. Such reasons may include, for example, performance of an agreement, management of user accounts, handling of ideas and complaints, sending commercial communications (newsletters) or showing advertisements based on the customers’ interests;

Cookies: Short text files saved by your web or mobile browser. Most cookies contain a unique identifier, i.e. cookie ID. It is a string of characters assigned by websites and servers to the browser that saved the cookie. This allows websites and servers to distinguish and identify individual browsers. Cookies are used to improve the performance of websites, evaluate their traffic, and better target marketing activities. If you browse our website, we assume you agree with using of these files.

2. What personal data are processed?

We and our contractual processors, following the relevant legal title and purpose of processing, process the following personal data, or categories of personal data:

a) **electronic contact details:** e.g. phone number, e-mail address; other electronic data: IP address, cookies, social network identifiers, location data of the device used by the customer, etc.;

b) **other personal data:** typically, data provided by the customer in an order form or other documents and in communication with us, including later updates.

3. What is the origin of your personal data?

We process data you provide e.g. when ordering our services, registering a user account, communicating with us, or opting in for a newsletter. Typically, they include:

- **identification and address data;**
- **electronic contact details;**
- **other personal data related to a contractual relationship;**
- **other personal data;**

further, we process data obtained from public sources (commercial, trade and other registers, information portals on European funds, etc.);

as well as the data we get automatically as you browse through our website. Typically, they include:

- **other electronic data:**
- cookies
- the website you came from to our website;
- IP address;
- date of access and access time;
- search queries;
- http and https answer code;
- transmitted data groups;
- information about the browser and operating system of your computer.

4. Why personal data are processed?

Your personal data may be processed for the following purposes:

- **Contractual relationship performance**

Purpose: Under an agreement with us, you are entitled to be provided the agreed performance of the contract. On the other hand, we are entitled to be paid the agreed price. In order to be able to fulfil our part and to verify the fulfilment of your part of the obligation, we

need to process your identification and address details, contact details and other personal data related to the contractual relationship (e.g. an account number etc.).

Legal basis: Personal data processing for the purpose of performing a contractual relationship is justified by the contractual relationship between you and us. The provision of personal data in this case is a contractual requirement without which the agreement cannot be concluded.

Retention period: The data retention period is determined by the duration of customer's contractual relationship with us.

- Customer account management

Purpose: Customers can register and manage their personal settings on our website. For this purpose, we need to process your e-mail address, or you can also provide us with your name, surname, address, and phone number.

Legal basis: The processing of personal data for the purpose of managing customer accounts is justified by your consent. The provision of personal data is voluntary in such case. However, it would not be possible to register without it. You can withdraw your consent at any time.

Retention period: The data retention period is determined by the duration of your consent. We will consider your consent to be withdrawn when you do not log in to your account for 3 years.

- Customer communication, satisfaction assessment, handling of ideas, complaints and claims

Purpose: We use your data to manage your queries, handle ideas and complains with our customer support. If you decide to use one of social networks to communicate with us, it is important to keep in mind that the processing of data provided this way is also governed by the terms of such social networks on which we have no influence. We also process your data in cases where your rights arise from defective performance and in the exercise of your rights in relation to the processing of your personal data.

Legal basis: The processing of personal data for the purpose of customer communication, satisfaction assessment, handling of ideas, complaints and claims is justified by our legitimate interest in communicating with our customers. The provision of personal data in this case is not a legal or contractual requirement. You are under no obligation to provide us with your personal data for this purpose. In case you decide to publish a review, you do so on a voluntary basis, and we process your data on the basis of your consent. You may withdraw your consent at any time. Providing your personal data in this is not a legal or a contractual requirement. Therefore, you are under no obligation to provide us with your personal data for this purpose.

Retention period: The data retention period depends on the duration of the customer's contractual relationship with us, and then it lasts for a period of 4 years after its termination. In case if a product review or recommendation, the retention period is determined by the duration of your consent.

- Sending commercial communications and offering our products

Purpose: We regularly send our customers and those who have given their consent news about our products by e-mail. You can quickly and easily stop receiving these commercial communications at any time by using the opt-out link contained in each communication. You can also manage your preferences on sending commercial communications in the settings accessible via each newsletter.

Therefore, if you are our customer (for example, if you have made an order with us), we may use your e-mail address that you have provided us to send commercial communications about similar products unless you express your disapproval (i.e. opt-out). In other cases, we ask for your consent with receiving commercial communications about our products, events and promotional campaigns (i.e. opt-in). We can use the information you provided us as well as information obtained otherwise in relation to our products - such as how you use the website, order details or information about your participation in events and competitions, to personalize our commercial communications. We will ask you for your consent with sending commercial communications whenever your consent is required by the applicable law.

Legal basis: The processing of personal data for the purpose of sending commercial

communications and offering our products is justified by your consent or by our legitimate interest in direct marketing. Providing personal data based on your consent in this case is voluntary, but it would not be possible to send you commercial communications without it. You can withdraw your consent at any time. The provision of personal data in this case is not a legal or contractual requirement. You are under no obligation to provide us with your personal data for this purpose.

The data retention period is determined by the duration of your consent. We will consider your consent to be withdrawn or legitimate interest terminated if you do not open our commercial communication for 3 years.

- Direct marketing and creation of personalized content and advertising

Purpose: A personalized content and advertising creation technologies allow us to show visitors who have already expressed their interest in our website and products, our advertisements on partner websites. We strive to show you only the advertisements that you are really interested in, and not advertisements without any connection to your person and interests. Based on your order history, interests, and website behavior, personalized content and offers can be displayed on our website and on third-party websites and applications (including social networks). This is especially possible with cookies. To manage your cookie preferences, read the section Cookies.

Legal basis: The processing of personal data for the purpose of direct marketing and creation of personalized content and advertising is justified by your consent or by our legitimate interest in direct marketing. Providing personal data based on your consent in this case is voluntary, but it would not be possible to provide you personalized content and advertisements without it. You can withdraw your consent at any time. The provision of personal data in this case is not a legal or contractual requirement. You are under no obligation to provide us with your personal data for this purpose.

Retention period: The data retention period is determined by the duration of your consent. The retention period may vary depending on the type of cookies. Some cookies are limited by the duration of the session (so-called relational or session cookies). These are processed while the browser is running and are automatically removed after shutting down. Other cookies are

persistent (persistent cookies). These cookies remain in the browser even when it is turned off until the specified date, or when the user manually deletes them. According to these cookies, the user's computer can be identified when the web browser is restarted, and the Internet is browsed. You can read more about the retention period of cookies in the section Cookies.

- Improving quality of provided services, our website traffic analyses and analyses of your behavior on websites

Purpose: The development of new products and services and the improvement of existing ones is done by identifying the needs and wishes of users through telephone calls, questionnaires, web analyses, analyses of interest in certain products or services and texts etc. Furthermore, in relation to browsing our website, we process information about traffic, readings, a number of pages viewed, device from which you come to our website, and the time spent on the website. These data help us identify less accessible or less understandable places on our website. We collect these data to provide quality content that is user-friendly and to develop services that you are clearly interested in. Based on these data, we regularly improve our website.

In cooperation with partners providing us with analytical services, we collect data on each visit to our website to help us understand how you use our website and to get aggregated statistics. These include the IP address, device location, browser type, browser language, date and time of your request, duration of your visit, displayed pages, and clicked elements (such as links). When collecting and analyzing these data, we may use cookies, pixel tags, web beacons, clear GIF files, and similar tools on our websites or e-mail messages. These data help us provide better and more relevant content for the website, track advertisement performance, detect and correct potential issues, and improve the overall environment of our website. We may also instruct third-party service providers to provide web-based advertising on our behalf. These providers can use pixel tags and similar technologies to collect information about visits to our website, and then use this information for targeted advertisements.

If you do not want your data to be collected using these technologies, you can use a simple procedure: most browsers offer you the ability to automatically reject many such technologies or choose whether you accept or reject them. To manage your cookie preferences, read the section Cookies.

Legal basis: The processing of personal data for the purpose of improving quality of provided services, our website traffic analyses and analyses of your behavior on websites is justified by your consent, or by our legitimate interest in direct marketing. Providing personal data on the basis of your consent is optional in such case, but it would not be possible to improve the quality of the services provided to you, analyze the traffic to our website and your website behavior without it. You can withdraw your consent at any time. The provision of personal data in this case is not a legal or contractual requirement. You are under no obligation to provide us with your personal data for this purpose.

Retention period: The data retention period is determined by the duration of your consent. The retention period may vary depending on the type of cookies. Some cookies are limited by the duration of the session (so-called relational or session cookies). These are processed while the browser is running and are automatically removed after shutting down. Other cookies are persistent (persistent cookies). These cookies remain in the browser even when it is turned off until the specified date, or when the user manually deletes them. According to these cookies, the user's computer can be identified when the web browser is restarted, and the Internet is browsed. You can read more about the retention period of cookies in the section Cookies.

- Protection of our rights, property or safety or rights, property or safety of others

Purpose: We may use information about how you use our website or data about your orders to prevent or detect frauds, misuse, illegal use, and violation of our Business Terms and Conditions, as well as to comply with a decision of the court or other law enforcement bodies, the state administration or the conditions established by the applicable legal regulations.

Legal basis: Processing of personal data in order to protect our rights, property or safety or the rights, property or safety of others is justified by the fulfilment of legal obligations, or our legitimate interest in the protection of our rights, property or safety or the rights, property or safety of others. The provision of personal data in this case is not a legal or contractual requirement. You are under no obligation to provide us with your personal data for this purpose.

Retention period: The data retention period is 4 years upon the termination of our contractual relationships, or 4 years upon their receipt.

- Accounting and tax purposes

Purpose: We also need to process your personal data because we are obliged to do so according to the appropriate accounting and tax law.

Legal basis: Processing of personal data for accounting and tax purposes is justified by the fulfilment of legal obligations. We must process these data about you.

Retention period: We process personal data for accounting for 5 years and the invoices for 10 years.

- Fulfillment of other legal obligations

Purpose: Among other legal obligations which we must comply with belong, for example, obligations against money laundering.

Legal basis: Processing of personal data for the purpose of fulfilling other legal obligations is justified by the compliance with the legal obligations. We must process these data about you.

Retention period: Accounting data are processed for the time period required by the applicable law.

5. Who has access to the personal data?

Your personal data are primarily made available to our employees who need the data to provide you with our products and services.

In addition to our employees, we need to pass on your personal data to various business partners that enable us to function and help us deliver better, more accurate and more personalized content and services. The partners that we entrust your personal data with are very carefully selected. We only work with those who are able to provide such technical and organizational security of your personal data so as to prevent unauthorized or accidental access to your data or their misuse. All of these partners are authorized to process your data solely on the basis of a personal data processing contract in which they undertake the

obligation of confidentiality. The data provided must not be used for any other purpose than for which we have made the data available to them.

The following categories of our partners (recipients) can access your personal data:

- Partners whom we provide the data to analyze the visit rate of our website, your website behavior, and business conversions

We strive to make your experience of using our website as enjoyable as possible. That is why we work with partners who conduct visit rate and your behavior analyses on our website. Thanks to these partners, we have information about which part of our website is unclear, where you are looking for the information you are looking for and whether you find it, which offers on our website you have clicked on, etc. Based on this information, we regularly improve our website.

- Partners who provide us with services that ensure the technical operation of a particular service, and technology operators we use for our services

In order for our website to function properly, we need to work with a wide range of partners who provide us with their services, ensure the technical operation of a particular service, or operate the technologies we use for our services. Typically, they include these categories of partners:

- providers of information and communication services and hosting, including cloud storage,
- providers of security and integrity of our services and websites, providers of analytical services, customer support assistant service and satisfaction assessment service providers,
- payment gateway providers (payment card providers),
- social network operators,
- legal service providers, lawyers,
- providers of printing and postal services, including couriers,
- partners working with us during organization of conferences, seminars and other events.

- Our direct marketing partners and our technical solution partners and providers, thanks to which we can show you personalized content and advertising

- In order to present and promote our services, we use marketing agencies to which we provide some data that we need for accurate targeting of our ads.
- In order to provide the best experience while visiting our website, we will provide you with

relevant information, recommend services, and send reminders of orders left in your shopping cart. All of these services are based on your previous purchases, on which items you click on our website and which information you have provided to us.

- In order to ensure that our ads will be shown to a relevant audience, we share your personal data, including email addresses, with providers of technical solutions to help us show you personalized content and advertising.

Public authorities:

- We make the personal data available in case of law enforcement, if it is required by law or if it is necessary to prevent, detect and prosecute criminal offenses and frauds or, as the case may be, we are otherwise legally required to do so.

- These may include law enforcement bodies (police, prosecution and courts) or tax offices.

- The transfer of the personal data to these recipients does not take place regularly but only incidentally, especially if required by law.

6. Are personal data transferred outside the EU?

If we transfer personal data of our customers for processing to a third country (outside the European Economic Area, including countries outside the European Union - Iceland, Liechtenstein and Norway) or an international organization, we do so only provided that the third country or international organizations provide an adequate level of protection, or where the recipient of the personal data provides appropriate safeguards for their protection and where the enforceable rights of data subjects and the effective legal protection of data subjects are available in the country of destination.

The European Commission has so far recognized an adequate level of protection in the following countries: Andorra, Argentina, Canada (trade organizations), the Faroe Islands, Guernsey, Israel, the Isle of Man, Jersey, New Zealand, Switzerland, Uruguay and the USA (limited to the Privacy Shield framework).

7. How are personal data processed?

Personal data are processed manually as well as in an automated way. For all processing activities, we maintain proper records in compliance with applicable laws.

8. What are the rights of data subjects?

When you exercise your rights, please contact us through our contact details listed in the introduction of this policy. We reserve the right to verify the identity of the applicant for the rights in question in an appropriate manner. If requests are repeated and are clearly unreasonable or inappropriate, we may charge you a reasonable fee or refuse to accept the request.

- Right of access to personal data

If you want to know if we process your personal data, you have the right to obtain from us the information about whether your personal data are processed and, if so, you also have the right to access your personal data. In case of a repeated request, we are entitled, based on our administrative costs, to charge a reasonable fee for a copy of the personal data provided.

- Right to correct inaccurate and complete incomplete personal data

If you believe we are processing inaccurate or untrue data about you, you have the right to request their correction. You also have the right to complete any incomplete data. We will do the correction or update without undue delay, always with respect to our technical possibilities.

- Right to have the data erased

If your personal data are no longer needed for the purposes for which they were collected or otherwise processed, or if you find out that they have been processed unlawfully, you have the right to request that they are erased.

- Right to restrict the processing of personal data

If you are not interested in complete erasure, but only in a temporary restriction of the processing of your personal data, you may request us to restrict the processing of your personal data.

- Right to data portability

In case you want us to pass on your personal data to third parties, you can exercise your right to data portability. If any rights and freedoms of third parties could be adversely affected by such exercise of your right, we will be unable to comply with your request.

- Right to object

You have the right at any time to object to the processing of personal data that is processed for the purpose of performing a task carried out in the public interest or in the exercise of public authority or for the purpose of protecting our legitimate interests. If we fail to prove that there is a serious legitimate reason for the processing that outweighs your interests or rights and freedoms, we will terminate the processing based on your objection without undue delay.

- Right to withdraw consent at any time

If processing of your data is based on your consent, you have the right to revoke your consent at any time.

- Right to information on automated decision-making, including profiling

You are not the subject of any decision based solely on automated processing, including profiling, which would have legal effects or a significant impact on you in a similar way.

- Right to file a complaint with the Office for Personal Data Protection

You have the right to file a complaint with the supervisory authority, which is the Office for Personal Data Protection with the registered office at Pplk. Sochova 27, 170 00 Prague 7, phone: 234 665 111, web: www.uoou.cz.

9. How are cookie files processed?

Cookies are used by most websites and servers to provide a whole range of basic Internet services. If you shop online, cookies are used by online shops to store the items you have previously added to your shopping cart. Cookies also allow websites to store your preferences (such as language or login) and use them during your next visit. Using cookies, one can also collect statistics on user activities, such as the number of unique visitors of the website per month, which are very valuable to the operators as they help to provide better, more user-friendly services.

Cookies can be divided by validity into:

- **Session cookies** that remain stored in your browser only until you close your browser;

- **Persistent cookies** that remain in your browser for a long time until their lifetime expires or until you manually delete them (cookie storage time in your browser depends on cookie settings and browser settings);

and by their function into:

- **Essential** that are necessary for the functionality of our website,

- **Preferential** that allow our website to remember the information that changes how the website behaves or what it looks like (e.g. the preferred language or region you are in); these cookies are not strictly necessary for the functioning of our website, but increase the functionality and practicality of its use,

- **Analytical** that help us analyze your experience on our website (so-called User Experience) and thanks to which we understand how you use our website,

- **Remarketing** which we use to properly target and personalize content and ads as well as for analysis and measurement of the performance of a particular sales channel.

We also use third-party cookies that track multiple websites in order to provide you with personalized content and advertising on third-party websites and other sales channels.

Our website uses retargeting technology which helps us to categorize our website users into user groups. According to a particular user group, we may show you personalized advertisement related to our products on other websites or apps.

10. Where can I learn more about the processing of personal data and privacy on the Internet?

You may change your browser settings so that it removes cookies or prevents them from being stored on your computer or mobile device without your explicit consent. For information about cookies setting, see the relevant browser help section. How it works on the most commonly used browsers can be found here:

Internet Explorer: <https://support.microsoft.com/help/17442/windows-internet-explorer-delete-manage-cookies> **Mozilla Firefox:** <http://support.mozilla.com/en-US/kb/Cookies>

Google

Chrome: <http://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647>

Safari: <http://support.apple.com/kb/PH5042> Opera:
<http://www.opera.com/browser/tutorials/security/privacy/> **Adobe (flash cookies):** <http://www.adobe.com/privacy/policies/flash-player.html>

You can also visit <http://www.youonlinechoices.com/> (English), www.allaboutcookies.org (English) or www.aboutads.info/choices (English), where you can learn about the possibilities of refusing certain targeted advertising activities offered by some third parties with whom we work.

You can read about cookies on Wikipedia: https://en.wikipedia.org/wiki/HTTP_cookie (English).

11. Are data on children also processed?

Our website is not intended for children under the age of 18. Therefore, we do not deliberately collect their personal data. If we find that we have inadvertently obtained personal data on children under the age of 18, we will take steps to erase these data as quickly as possible, except when we are legally bound to keep them.

12. Conclusion

Legal regulations as well as our business strategies and the related ways of processing your personal data may change. If we decide to update these policies, we will post the changes to our website and we will inform you of these changes. In cases where there is a major change to these policies or, if the law imposes us to do so, we will inform you in advance. We ask you to carefully read these policies and periodically review these policies when communicating with us or using our website.

We tried to make this policy as clear as possible. If something is still unclear, do not hesitate to contact us with a question or comment, we will be pleased to explain any term or section to you.