PRIVACY POLICY

# Introduction and contents of this document

* 1. In this document you will find information on how the company **Symbols s.r.o..**, with its registered office at Náprstkova 2, 110 00 Staré Město, Praha, business ID no. (IČO): 03535126 (hereinafter referred to as “**We**” or “**Our Company**”) processes personal data about you as a data subject (hereinafter referred to as “**You**”).
	2. This policy provides you with information on the purpose for which our company processes your personal data, to which extent your personal data are processed (i.e., what categories of data are processed), on which legal basis we base our right to process your data (performance of a contract, legitimate interest, performance of a legal duty, consent, other) and for how long we are authorized to process them.
	3. This policy further contains information on what rights you have in relation to the processing of your personal data, and how you can exercise them towards us.
	4. For better orientation within the policy, you can use the following table of contents (**What specifically are you looking for?**).

# What specifically are you looking for?

1. Introduction and contents of the document 1

1.4. For better orientation within the policy, you can use the following table of contents (What specifically are you looking for?).

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# What personal data we process about you, for which purpose, for how long and what authorizes us to do so

* 1. We process different categories of personal data for different purposes. In particular, this concerns the following categories:
* *Identification data (e.g., name, surname, business ID no., tax ID no., date of birth, gender);*
* *Contact details (e.g., email address, telephone number);*
* *Address data (e.g., address of permanent residence, delivery address);*
* *Data necessary for the execution of payments and posting of payments (e.g., account number, bank code, IBAN, SWIFT);*
* *Your device ID data (IP/Mac address);*
* *Login credentials (such as access passwords and codes to the extent necessary for technical provision of services);*
* *Information on ordered goods or services, a contract and performance of the contract by both you and us (for example, information on the contract including the conclusion date, duration, date and reason for termination, description of the transaction and price of the goods)*
* *Information on your conduct on the web (cookies)*
* *Information on the extent and use of services (e.g., purchase history);*
	1. What personal data we process about you, for which purposes and for how long depends on how and why you gave us your personal data, or how we obtained them from you. You can also find information about your personal data processing, depending on the context in which we process your personal data:

# Visiting the website [www.smbls.cz](http://www.queens.global/)

When you visit our website [www.smbls.cz,](http://www.queens.global/) we automatically process certain personal data about you in the extent, for the purpose, duration and based on the authorization (legal title) included here:

|  |  |  |  |
| --- | --- | --- | --- |
| **Purpose** | **Scope of processed data** | **Legal title** | **Processing time** |
| Improving the website [www.queens.globa](http://www.queens.globa/) l | Facts about your conduct on the website (by means of so-calledcookies) | Our company’s legitimate interest in improving our website | No restrictions |
| Creating statistics and reports on the use of the website [www.queens.globa](http://www.queens.globa/) l | Facts about your conduct on the website (by means of so-called cookies) | Our company’s legitimate interest in measuring the efficiency of our website, including advertising on thiswebsite | No restrictions |
| Displaying targeted advertisement on different websites and the handover thereof to other providers | E-mail, data on your website movement | Consent to personal data processing | 540 days maximum |

You have the right to object to the processing of your personal data in order to fulfil our legitimate interest in improving and measuring the effectiveness of our website [www.smbls.cz](http://www.queens.global/) in accordance with the procedure specified in Chapter 4.7. If we have no legitimate reason to continue processing your personal data for these purposes despite your objection, we will cease processing your personal data in this context.

# Registration form

Using the registration form, you have the option to create your own user account on the website [www.smbls.cz,](http://www.queens.global/) through which you can make your own purchases. In this case, we process your personal data to the extent, for the purpose, duration and based on the authorization (legal title) included here:

|  |  |  |  |
| --- | --- | --- | --- |
| **Purpose** | **Extent of****processed informatio** | **Legal title** | **Processing time** |
| Execution ofcustomer | Identification dataContact | Necessity to fulfil acontract, or more | Until thecancellation of |

|  |  |  |  |
| --- | --- | --- | --- |
| registration, management and administration of user account | information Login details | precisely, the necessity for measures received before the conclusion ofthe contract withinyour registration request | registration by the user, but at most for 3 years from the last login |
| Sending offers of products and services of Symbols s.r.o. | Contact information (email address) | Our company’s legitimate interest in sending business offers of our ownproducts and services to those who have expressed an interest in our products and services by settingup a user account | Until the moment you tell us you do not wish to receive business offers, at most for the duration of registration |
| Addressing the customer with advice on selecting goods | Contact details (email address and phone number) | Legitimate interest in assisting customers with completing orders | Until the cancellation of registration by the user, but at most for 3 years fromthe last login |

Stating these personal data in order to effect customer registration, management and administration of your user account is entirely voluntary; however, without stating them we are unable to register your account.

In addition, we process the email address you entered in the registration form to enable us to offer you our products and services. You have the right to object to the processing of your personal data for the purposes of sending business communications according to the procedure specified in Chapter 4.8, on the basis of which we will immediately cease sending business communications and processing your personal data in this context. We will also cease sending these business communications and processing your personal data in this regard if you let us know that you do not wish to receive business communications (for example, by clicking on the respective link that appears at the end of each commercial communication).

# Form for completing delivery data for registered users

If you have a user account at [www.smbls.cz,](http://www.queens.global/) within the administration of your account you can enter under the “Address” tab your personal data, which will then be used for simplifying future purchases by pre-filling the order form.

In this case, we process your personal data to the extent, for the purpose, duration and based on the authorization (legal titles) included here:

|  |  |  |  |
| --- | --- | --- | --- |
| **Purpose** | **Extent of processed information** | **Legal title** | **Processing time** |
| Making orders in the e-shop[www.smbls.cz](http://www.smbls.cz) by pre-filling delivery details in order forms | Identification data Contact informationLogin data Address data | Necessity to fulfil a contract, or more precisely, the necessity for measuresreceived before the conclusion of the contract within the management of your user account | Untilcancellation of the registration by the user, but at most for 3 years from the last login, or until the moment of erasure of these data by the user within their own account, but at most for theduration of registration |

Providing these personal data on your part in order to pre-fill the order form is entirely voluntary.

# Order form

Through the order form, you have the opportunity to submit your personal data, which are used for order processing at [www.smbls.cz.](http://www.queens.global/) In this case, we process your personal data to the extent, for the purpose, duration and based on the authorization (legal title) included here:

|  |  |  |  |
| --- | --- | --- | --- |
| **Purpose** | **Extent of processed****information** | **Legal title** | **Processing time** |
| Execution of | Identification data | Necessary for the | Within 3 years of |
| orders, including | Contact data | performance of the | fulfilling the |
| payment, delivery | Address data | contract | contract (delivery |
| of goods and | Information on |  | of goods and |
| communication | ordered goods |  | paying the |
| with the customer | or services, |  | purchase price); |

|  |  |  |  |
| --- | --- | --- | --- |
|  | contract and performanceof the contract by both contracting parties |  | basic data about legal relationship and its existence (contractual parties, subject of commitment, etc.) for10 years after fulfilment of the contract (delivery of goods and paying thepurchase price) |
| Sending an offer of products and services to Symbols s.r.o.., including tailor- made offers | Identification data Contact data Information on the degree and way of using services | Legitimate interest in sending business communications to previous customers according toAct No. 480/2004Sb., on Certain Information Society Services | Until the moment you let us know you do not wishto receive business offers |
| Addressing the customerfor the purpose of ascertaining his/her satisfactionwith the purchase | Identification data Contact data | Legitimate interest in ascertaining satisfaction of our customers | Within 1 month of execution of the order |
| Displaying targeted advertisement on other websites and handover to advertisingoperators | Contact details (email) | Consent to personal data processing | Until withdrawal of consent |
| Fulfilment of legal obligations in the field of consumer rights protection, accounting and tax law andcriminal law | Identification data Address data Identification data of your device Information on the ordered goodsor services, | Necessity to comply with legal requirements | For the time specified by the applicable laws, in particular:Act No. 235/2004Coll., onValue Added Tax |

|  |  |  |  |
| --- | --- | --- | --- |
| regulations | contract and performance of contract by both contracting parties |  | Act No. 563/1991Coll., on Bookkeeping. Data on taking evidencein criminal proceedings for 5 years fromexecution of the order |

If you decide to order something from us, these data are necessary for us to handle your order, conclude a contract with you, on the basis of which we will provide you with goods or services, and to fulfil this contract. We also have to comply with our legal duties.

In addition, we process personal data you entered in the order form to offer you our products that are similar to those you bought from us. You can object to the processing of your personal data for the purposes of sending business communications in accordance with the procedure specified in Chapter 4.8, on the basis of which we will immediately cease sending business communications and processing your personal data in this context. We will also cease sending these business communications and processing your personal data in this context if you let us know that you do not wish to receive business communications (for example, by clicking on the relevant link, which is included at the end of each business communication).

We further process your personal data to ascertain your satisfaction with the purchase. You may also object to the processing of your data for this purpose according to the procedure in Chapter 4.7, on the basis of which we will immediately cease data processing in this context.

In order to offer you the type of goods that you were interested in in the past, we provide some of your personal data to advertisement providers. Your consent to the passing on and displaying of ads on other websites is entirely voluntary and if you grant such consent, you have the right to withdraw it in accordance with the procedure specified in Chapter 4.1.

# Sending information about stock resupplying

If you want to order goods that are not in stock at the moment, we use the personal data you have entered when completing the order form to send you information that the item has already been restocked.

|  |  |  |  |
| --- | --- | --- | --- |
| **Purpose** | **Extent of processed****informatio** | **Legal title** | **Processing time** |
| Sending information on stock resupplying | Identification data Contact data Login data Address data | Necessity for measures taken before contract conclusion | Within 2 years of the failure to execute orders based on information on stock resupplyingof goods |

Stating these personal data on your part is entirely voluntary, but these data are necessary to complete and then execute your order.

# Newsletter

You have the opportunity to state your personal data via the sampling form at [www.smbls.cz](http://www.queens.global/) for us to send you business communication, the contents of which comprise newsletters and offers of our service products. In this case, we process your personal data to the extent, for the purpose, duration, and based on the authorization (legal title) included here:

|  |  |  |  |
| --- | --- | --- | --- |
| **Purpose** | **Extent of processed information** | **Legal title** | **Processing time** |
| Sending offers of products and servicesto Symbols s.r.o.. | Contact data (e- mail address) | Consent to personaldata processing and sending business communications | Until the moment you let us know you do not wish to receive business offers,or until the momentyou withdraw your consent to the processing of your personal dataand sending of business ommunications |

Providing these personal data on your part is entirely voluntary, but these data are necessary for us to be able to send you our business communications with offers of products or other services. You can withdraw your consent to the processing of your personal data by following the procedure specified in Chapter 4.1.

# Complaining about goods

If you believe that your purchased goods have defects, you have the opportunity to state your personal data through complaints sent to us by post or by filling out the complaint protocol at one of our branches.

In this case, we process your personal data to the extent, for the purpose, duration and based on the authorization (legal title) included here:

|  |  |  |  |
| --- | --- | --- | --- |
| **Purpose** | **Extent of processed information** | **Legal title** | **Processing time** |
| Fulfilment of legal obligations concerning enabling and settlement of claims for goods/services | Identification data Contact data Address data Information on the ordered goodsor services, contract and performance of the contract by both contracting parties | Fulfilment of legal obligations | For the duration of the contract and for a period of 3 years from performance of the contract; basic data about the legal relationship and its existence (contracting parties, subject of commitment, etc.) up to 10 years after fulfilment of thecontract |
| Claims concerning goods/services over and above the legal framework responsibilities | Identification data Contact data Address data Information on the ordered goodsor services, contract and performance of the contract by both contracting parties | Necessary for the performance of the contract | For the duration of the contract and for a period of 3 years from performance of the contract; basic data about the legal relationship and its existence (contractingparties, subject of ommitment etc.) |

|  |  |  |  |
| --- | --- | --- | --- |
|  |  |  | up to 10 years after fulfilment of thecontract |

Based on legal provisions, if you are a consumer, we have an obligation to process personal data necessary to enable you and, where possible, to settle the complaint about the goods/services we have provided to you.

In case we are not legally obliged to enable your complaint, but we do so based on our own decision, we process the personal data necessary to be able to fulfil your claim and thus to fulfil the obligations under the contract.

# Contacting our company

You can contact us via e-mail or phone with requests for information and answers to any queries you may have. In this case, we process your personal data to the extent, for the purpose and based on the authorization (legal title) included here:

|  |  |  |  |
| --- | --- | --- | --- |
| **Purpose** | **Extent of processed information** | **Legal title** | **Processing time** |
| Answering a query | Identification data Contact data (e- mail address, phone number) | Consent to personal data processing | For 1 year from answering a query, or possibly for 1 year after the last communication between our company and youwithin the relevant query |

Providing these personal data on your part is entirely voluntary, however, without them we are not able to answer your query.

You also have the right to withdraw this consent at any time, following the procedure below in 4.1.

# Job interest form

Through our website and e-mail you have the opportunity, if interested in working in our company, to state your personal data in order to participate in the selection process for one of our currently listed vacant positions. In this case, we process your personal data to the extent, for the purpose and based on the authorization (legal title) included here:

|  |  |  |  |
| --- | --- | --- | --- |
| **Purpose** | **Extent of****processed informatio** | **Legal title** | **Processing time** |
| Recruitment of employees, conducting the selection procedureandnegotiations on the conclusion of an employment contract(or agreements on work performed outside the employmentrelationship) | Identifying data Contact data(e-mailaddress, telephone number) | Necessity for the preparation and fulfilment of an employment agreement | Until the selection of a candidate |

Providing these personal data on your part is entirely voluntary, however, without them we are not able to place you in the selection procedure.

# Who do we pass your personal data on to?

* 1. We do not know who we will be providing your personal data to in advance. That is why we state here categories of potential recipients, explaining why your personal data could be handed over:

|  |  |
| --- | --- |
| **Recipient** | **Reasons for access** |
| External accountants and auditors | We can outsource our accounting and tax agenda to experts outside our company, in which case we need to make your personal information available to the extent necessary for the fulfilment of the contract with you and the fulfilmentof our legal obligations |
| Persons providing marketing and graphic services | Marketing agencies, marketing specialists, and graphic designers help us with the preparation andimplementation of marketing campaigns (consisting of sending business offers) |
| Person ensuring sending of businessoffers | It may occur that we will entrust a thirdperson with sending of commercial |

|  |  |
| --- | --- |
|  | offers, to whom we will provide your personal data for this purpose within the scope of the personal data that we process for the purposes of sendingbusiness offers |
| Person ensuring our web and software operation (computer systems) | We need a software provider that is in the position of a personal data processor to service our websites and informationflow systems |
| Person ensuring payment services (payment channel operators, banks, etc.) | In order to ensure proper payment (payment channel functions, payment delays, payment blockage, SIPO payments, etc.), we need to pass yourpersonal information to the person who ensures the payment |
| Legal and tax advisors | Occasionally, there may be a need for us to let legal or tax advisors consult information on legal relationships with you. This concerns persons who are legally bound by the duty ofconfidentiality. |

* 1. We would like to inform you that we will always uphold your right to obtain information regarding to whom, when and for what purpose your personal data were passed on.

# What are your rights?

With regard to the fact that our company processes personal data about you, in this section we would like to inform you about the rights you are entitled to. You can exercise any of your rights with us in any way that suits you and will enable us to verify that you are actually requesting (to verify your identity), and we will strive to meet your demands to the fullest extent possible. In order to best meet your requests, we ask you to exercise your rights in writing to our company address, Symbols s.r.o.., Náprstkova 2, 110 00 Staré Město,

110 000 Praha , business ID no. (IČO): 06551203, or by e-mail to symbols.shop@gmail.com.

* 1. Right to withdraw consent

If we process your personal data on the basis of your consent, it is your right to withdraw consent to the processing of personal data, including consent to sending business communications. You can withdraw your consent by a request sent to symbols.shop@gmail.com.

As regards the processing of your personal data for the purposes of sending business communications, you can easily withdraw consent to the processing of your personal data and your consent to sending of business communications by clicking on the link that appears at the end of each business communication.

* 1. Right of access

You have the right to access the personal data that our company processes about you and at the same time the right to information on what personal data we process about you, for how long, what the purposes of their processing are, who we disclose it to and whether we use them for automated decision-making (or how this automated decision-making works).

A copy of your personal information will be provided free of charge. Only if there were more copies, we demand the necessary reimbursement for their provision.

* 1. Right to rectification

If you find out that we are processing incomplete or incorrect personal data about you, you have the right to have your personal data rectified or, if the purpose of processing so requires, that we complete it.

* 1. Right to erasure

You also have the right to have your personal data that our company keeps and processes about you erased. In order to request erasure, one of the following reasons must be given:

Your personal data are no longer needed for the purpose for which they were collected or processed;

* Your personal data are processed by our company unlawfully;
* You have withdrawn the consent under which your personal data were processed and we do not have any other entitlement (legal title) to further process these personal data,
* You object to the processing of your personal data if these personal data are processed for direct marketing purposes (e.g., sending of commercial communications);
* You object to the processing of your personal data we process based on our legitimate interest and if we are unable to prove that our legitimate interest outweighs your right to erasure;
* There is any legitimate reason that requires the erasure of such personal data;
* Our company processes a child’s personal data without being given parental consent to such processing.

Please note that there may occur a situation where your personal data may not be erased based on your withdrawal of consent to the processing of personal data or your request for erasure of personal data. Such is the case in particular when the law requires the processing of your personal data. In case this situation occurs, our company will inform you of the reason based on which your personal data cannot be erased.

* 1. Right to portability

Another right you can exercise is the so-called right to portability. According to this right, you may request the provision of your personal data that have been provided to us based on your consent and which we process in an automated way. We will provide your personal data which meet these conditions upon request in a commonly used, structured and machine-readable format, or we will pass on your request to another administrator of your choice, if feasible.

* 1. Right to restrict processing

In cases where you feel that your personal data processed by our company are flawed, you have the right to demand that we restrict processing of your personal data for the time necessary to verify the accuracy of your personal data and possible rectification thereof.

You also have this right in the following cases:

* Processing of your personal data by our company is illegal, but you do not want your personal data to be erased,
* Our company no longer needs your personal data for the purpose for which we have processed it, but you insist on the processing thereof (especially preservation) by our company to establish, exercise or defend your legal claims;
* You have objected to the processing of your personal data by our company on the basis of a legitimate interest, while the restriction of processing in this case will be valid for the time necessary to determine whether our legitimate interest overrides your right to keep your personal data being processed.
	1. Right to object to the processing of your personal data on the basis of a legitimate interest

Due to the fact that we process some of your personal data based on a legitimate interest, you have the right to object to this processing, based on which we will assess whether your personal data are truly in our legitimate interest for the purpose of processing or your right for your personal data to be further processed prevails.

* 1. Right to object to the processing of your personal data for direct marketing

You have the right to object to the processing of your personal data for the purpose of direct marketing (e.g., for the purpose of sending commercial communications). In such case, we will no longer process your personal data for this purpose.

* 1. Right to lodge a complaint

If all of the above rights are in your view insufficient, or you believe that our company in any way violates your rights, you have the option to file a complaint with the supervisory authority. You can file a complaint by contacting the Office for Personal Data Protection available at

https:[//www.](http://www.uoou.com/podatelna-uradu/os-1006)u[oo](http://www.uoou.com/podatelna-uradu/os-1006)u[.com/podatelna-uradu/os-1006.](http://www.uoou.com/podatelna-uradu/os-1006)

# Cookies

Our website [www.smbls.cz](http://www.queens.global/) uses so-called cookies. Information on how, for which purpose and to what extent we use cookies can be found here https:[//www.quee](http://www.queens.com/section/cookies)n[s.c](http://www.queens.com/section/cookies)o[m/section/cookies.](http://www.queens.com/section/cookies)

# Effect

This policy is effective from 25 May 2018.