

Privacy and personal data protection policies
(the “Policies”)

I. Introduction

1. We consider the privacy of our website visitors an extremely important aspect, and we have taken steps to protect them. In these Privacy policies there are listed the rules governing the protection of privacy and personal data.
2. With consent to the use of cookies you grant us during your first visit to our website, you will allow us to use the information, which we will get by means of a set of cookies, every time during your next visit to our website.
3. The personal data administrator is the company **Capitol Development s.r.o., with its registered office at Pštrossova 192/24, Nové Město, 110 00 Prague 1, ID No.: 45307156, tel.: +420 739 323 611, e-mail: obchod@capitol.cz.**
4. The administrator did not appoint a Commissioner for Personal Data Protection (PDP).

II. Personal data

1. The following types of personal data may be collected, stored and used:
 - 1.1 information about your computer including the IP address, geographical location, browser type and browser version and operating system;
 - 1.2 information about your visits and use of this website including the duration of the visit, the pages viewed and the passage of the website;
 - 1.3 information such as e-mail address if you enter it when registering on our website;
 - 1.4 information you enter when creating a profile on our website – e.g. your name, date of birth, employment status etc.;
 - 1.5 information such as your name and e-mail address you enter when you subscribe to our e-mail services and / or newsletters;
 - 1.6 information you enter when using the services on our website;
 - 1.7 information generated when you use our website including when, how often and under what conditions you use it;
 - 1.8 information relating to your use of the services, the used services or transactions you make through our website, including your name, address, telephone number, e-mail address and details of your identification card;
 - 1.9 information contained in any communication that you send to us by e-mail or via the website including the content and metadata alone;
 - 1.10 any other personal data you send us.
2. If you would like to disclose another person’s personal data to us, before you disclose it to us, you must obtain that person’s consent to the disclosure and processing of that personal information in accordance with this Policy.

III. Use of personal data

1. The personal data provided to us through our website will be used for the purposes stated in this Policy or on the relevant website pages. We may use your personal information for the following purposes:
 - 1.1 managing our website and providing services;
 - 1.2 personalizing our website to you;
 - 1.3 allowing and facilitating the use of the services available on our website;
 - 1.4 sending statements, comments and warnings;
 - 1.5 sending specifically requested e-mail notifications;
 - 1.6 sending our e-mail newsletter if you have requested it (you can notify us at any time if you no longer require it);
 - 1.7 sending the marketing communication regarding our business or the business of carefully selected third parties that we think may be of interest to you if you have explicitly consented to it by email or

similar technology (you can notify us at any time if no longer requiring the marketing communication);

- 1.8 providing third parties with statistical information about our users (but these third parties will not be able to identify any individual user from this information);
 - 1.9 handling inquiries and complaints you have made or otherwise concerning you in connection to our website;
 - 1.10 maintaining the security of our website and preventing fraud;
 - 1.11 verification of compliance with the terms of use of our website; and
 - 1.12 other use.
2. Without your explicit consent, we will not disclose your personal information to any third party for the purpose of their direct marketing or another third party's one.

IV. Publication of personal data

1. We may disclose personal data to any of our employees, suppliers or subcontractors as reasonably necessary for the purposes set forth in this Policy.
2. We may disclose personal data to any member of our group of companies (i.e. our subsidiaries, our main holding company and all of its subsidiaries) as reasonably necessary for the purposes set forth in this Policy.
3. We can publish personal data:
 - 3.1 to the extent that we are legally obliged to do so;
 - 3.2 in connection with any ongoing or future legal proceedings;
 - 3.3 to identify, exercise or defend our legal rights (including providing the information to others to prevent fraud and reduce credit risk);
 - 3.4 to any person we reasonably believe that they may request a court or other competent authority to provide such personal data and if, in our opinion, such court or authority could order the disclosure of such personal data.
4. Except as provided in this Policy, we will not disclose personal information to third parties.

V. International data transfers

1. The information we collect may be stored and processed, but it will not be transferred to any third country.
2. The personal data you release on our site may be available worldwide through the Internet. We cannot prevent the use or misuse of this information by others.

VI. Holding of personal data

1. Personal data we process in accordance with the legal regulation for any purpose or purposes may not be kept longer than necessary for that purpose or purposes.
2. Without prejudice to the content of the previous article, we will delete personal data that falls into the below categories as of the date and time below:
 - 2.1 personal data will be deleted no later than after 5th year since the last contact
 - 2.2 regardless of the other provisions of this part of the Policy we will hold documents (including electronic ones) containing personal data
 - 2.2.1 to the extent that we are legally obliged to do so;
 - 2.2.2 if we believe that the documents may be relevant to any ongoing or future legal proceedings; and
 - 2.2.3 to determine, exercise or defend our legal rights (including providing the information to others to prevent fraud and reduce credit risk).

VII. Security of personal data

1. We have taken adequate technical and organizational measures to prevent unauthorized access to personal data for their loss, misuse or alteration.
2. We store all personal data you provide on secure servers (protected by a password and a firewall).
3. All electronic financial transactions entered through our website are encrypted.
4. We explicitly note that the transmission of information over the Internet is inherently uncertain and the security of data sent over the Internet cannot be guaranteed.
5. You are responsible for maintaining the confidentiality of the password you use to access our site; we will not ask you for your password (unless you log in to our site).

VIII. Changes

1. We may occasionally update this Policy by releasing a new version on our website.
2. You should check this page from time to time to make sure you understand any changes to this Policy. We may notify you by email or through a message on our website about changes to this Policy.

IX. Your rights

1. You can ask us to provide you with information about any personal data, which we hold about you. Providing such information will be subject to proving your identity. To the extent permitted by applicable law, we may refuse to provide the personal data you require.
2. You have the following rights:
 - 2.1 the right to be informed about the processing of your personal data in the collection of personal data, especially on information about the purpose of the processing, the identity of the administrator, of their legitimate interests, of the personal data recipients;
 - 2.2 the right of access to personal data ;
 - 2.3 the right to repair, complete as the case may be;
 - 2.4 the right of erasure ;
 - 2.5 the right to limit processing ;
 - 2.6 the right to data portability ;
 - 2.7 the right to object ;
 - 2.8 the right not to be a subject to automated individual decisions with legal or similar effects including also profiling.
3. Please let us know if your personal data we work with needs to be corrected or updated.
4. You may invite us at any time not to process your personal data for marketing purposes.
5. In practice, you either explicitly agree in advance that we will use your personal information for marketing purposes, or we will offer you the option to cancel of using your personal data for marketing purposes.

X. Third-party websites

Our website contains hypertext links to the third-party websites and details of them. We have no control or responsibility over third-party privacy policies and practices.

XI. Cookies

1. We use only relational cookies
2. On our website we use relational cookies to recognize the computer