

Privacy Policy of JABLOTRON SECURITY a.s.

(effective from 25 May 2018)

Company:

JABLOTRON SECURITY a.s., reg. No.: 285 01 861, with its registered office at K dubu 2328/2a, 149 00 Praha 4, Chodov, Commercial Register file No. B 14899, kept at the Municipal Court in Prague

("JABLOTRON" or "the controller")

in accordance with Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("the **Regulation**") hereby provides its customers and other data subjects concerned (for example, representatives or contact persons of its customers, users of its services, persons interested in its services and goods, visitors to their websites, and suppliers and other business partners)

with information about the principles it observes as a controller of personal data under generally applicable data protection regulations in the processing of personal data of natural persons carried out in connection with the operation of its business and associated activities ("the **Policy**").

Terms not expressly defined in this Policy or other documents referred to herein have meanings as under the Regulation.

I. Communication with JABLOTRON in data protection matters

1. Communication with JABLOTRON in data protection matters can take place through the appointed data protection officer, either
 - a. in writing – by mail sent to JABLOTRON SECURITY a.s., Pověřenec pro ochranu osobních údajů (DPO - Data Protection Officer), K dubu 2328/2a, 149 00 Praha 4 – Chodov, Czech Republic, or to the email address poverenec.dpo@jablotron.cz;
 - b. in person – after prior arrangement with the DPO at the main office of JABLOTRON.
2. Alternatively, contact details on the JABLOTRON website can be used.

II. The purposes of personal data processing

1. JABLOTRON processes personal data always based on predetermined legitimate purposes known to data subjects.
2. For most purposes, personal data can be processed based on a contract, a legitimate interest of JABLOTRON or based on law, that is, without obtaining the consent of the data subject; consent is necessary for other purposes.
3. JABLOTRON processes personal data for the purposes of:
 - a. provision of security and other services,
 - b. fulfilment of contracts with its contractual partners,
 - c. fulfilment of its statutory obligations,
 - d. ensuring the protection of its rights and legally protected interests,
 - e. direct marketing,
 - f. advertising and marketing.

III. The legal basis for personal data processing

1. JABLOTRON will carry out the vast majority of personal data processing on the following legal basis:
 - a. processing is necessary for the fulfilment of a contract the data subject is a party to, or for the implementation of measures adopted before the conclusion of the contract at the request of the data subject;
 - b. processing is necessary for the fulfilment of a legal obligation that JABLOTRON is subject to, and that follows from a legal regulation,
 - c. processing is necessary for the purposes of the legitimate interests of JABLOTRON or a third party.
2. **A data subject's consent is not required** for processing in these cases.
3. In exceptional cases, processing can be based on the data subject's consent. JABLOTRON is obliged to demonstrate the **consent** at any time. Data subjects can withdraw their consent at any time.
4. In processing personal data, JABLOTRON observes the legality principle under the Regulation, i.e., if it processed personal data based on a legal title other than the aforementioned, it will be a title arising from legal regulations applicable to the controller.
5. Personal data processing for the purposes of the legitimate interests of JABLOTRON or a third party, will usually constitute one of the following interests:

- a. the maintaining or deepening of good relations with customers or business partners, including solutions to their requests, wishes or complaints,
 - b. direct marketing,
 - c. the protection JABLOTRON premises and employees from security risks,
 - d. keeping records of debtors, debt collection and dealing with other legal agenda associated with the operation of JABLOTRON.
6. JABLOTRON sends **commercial communications** in accordance with the relevant provisions of Act No. 480/2004 Coll., on certain information company services, as amended, and as a principle in the regime of direct marketing. For these reasons, it is entitled to do so without the consent of the data subject, but only until the data subject expresses their disagreement. In each commercial communication, JABLOTRON provides a clear and visible option to easily and free-of-charge refuse the use of the data subject's personal contact details for receiving commercial communications.

IV. Categories of personal data being processed

1. JABLOTRON processes the following categories of personal data, or some of them, for the respective purposes of processing:
 - a. identification data,
 - b. address details including addresses on social networks,
 - c. contact details and information necessary for communication (e.g. the password for communication),
 - d. details of services subscribed, their use of subscription and credit history or, where applicable, purchased goods,
 - e. operational data and specifications of the alarm, or other devices, which the use of JABLOTRON services is connected with, and information delivered from the device in connection with the use of JABLOTRON services (including location data),
 - f. specification of the guarded premises and areas,
 - g. records related to the operations of JABLOTRON, including phone calls, camera records, etc.,
 - h. records related to the setting, use or provision of services, including adequate documentation and recordings of phone calls
 - i. data related to the use of JABLOTRON websites,
 - j. data processed based on the data subject's consent.
2. The extent of personal data being processed always depends on the particular purpose of processing, but not always is it governed by the principle of data minimization arising from the Regulation.
3. JABLOTRON operates its website at www.bezpecnostnicentrum.cz. This website hosts **cookies**, which, however, do not process the personal data of the website visitors but they are designed to make the website browsing more user-friendly and for analytical purposes necessary for website improvement or adaptation to the needs of visitors. Details about installed cookies together with instructions on how to, where appropriate, set up the internet browser in relation to cookies, can be found [here](#).

V. Categories of recipients of personal data

1. In the context of processing, personal data may be disclosed to other entities, entitled recipients. There are (i) entities directly involved in some processing sub-activities, i.e., processors, or (ii) entities to whom data can be disclosed *ad hoc* as a result of their provision of specialised services to JABLOTRON (for example, legal counsels, IT specialists, etc.), whose primary role, however, is not the processing of such data.
2. All recipients are selected responsibly based on guarantees they provide to safeguard the data through adopted technical and organisational measures.
3. In principle, processors carry out data processing activities based on a data processing agreement in place.
4. In the above meaning, JABLOTRON may provide personal data to the following categories of recipients:
 - a. providers of cloud services (in the context of use of technologies associated with the services provided),
 - b. providers of security services (security intervention services),
 - c. entities providing installation, maintenance and servicing of security and other devices (a network of cooperating installation partners),
 - d. providers of postal services and electronic communications services (in the context of normal communication),
 - e. providers of direct-marketing services (sending of bulk correspondence),
 - f. banks (in the context of provision of payment transactions),
 - g. providers of advertising services (for the purposes of the controller's legitimate interests),
 - h. administrators of information systems (maintenance, support, and development of the IS used),
 - i. legal and other professional advisors and agents (for the purposes of the controller's legitimate interests),
 - j. certification authority (in connection with an ISO audit),
 - k. providers of archiving and shredding services (to ensure compliance with prescribed time limits),
 - l. companies belonging to the Jablotron holding (to link services with products of the holding),
 - m. insurance companies (in connection with handling claims),
 - n. law enforcement authorities and other state authorities (in connection with the fulfilment of a legal obligation),

- iii. If the data subject requests provision in electronic form, information will be provided in a commonly used electronic form.
- b. Right to rectification of inaccurate personal data
 - i. The data subject has the right that JABLOTRON rectify, without undue delay, inaccurate personal data relating to the data subject.
 - ii. The data subject has the right, taking into account the purposes of processing, for the completion of incomplete personal data, including by provision of an additional statement.
- a. Right to erasure
 - i. The data subject has the right, for reasons set out in Art. 17 of the Regulation, to the erasure of personal data relating to the data subject, and JABLOTRON will erase the data without undue delay, unless the processing is necessary for any reason set out in the Regulation.
 - ii. Where personal data that are to be erased had been published by the controller, the controller is to take, with regard to the available technology and cost of the implementation, reasonable steps, including technical measures, to inform controllers processing the personal data that the data subject is requesting such data.
- b. Right to restriction of processing
 - i. The data subject has the right that JABLOTRON restrict the processing of the data subject's personal data in any of the cases set out in Art. 18 of the Regulation.
 - ii. Where processing is restricted, JABLOTRON may process the personal data only under conditions set out in the Regulation.
- c. Obligation to inform with respect to the rectification or erasure of personal data or the restriction of processing
 - i. The data subject has the right that JABLOTRON inform each recipient to whom the personal data have been disclosed of any rectification or erasure of personal data or restriction of processing made in accordance with the Regulation, unless this proves impossible or involves disproportionate effort.
 - ii. If requested, JABLOTRON will inform the data subject of such recipients.
- d. Right to data portability
 - i. In cases set out in Art. 20 of the Regulation, the data subject has the right to obtain personal data relating to the data subject previously provided to JABLOTRON in a structured, commonly used and machine-readable format, and the right to transmit those data to another controller without hindrance from JABLOTRON.
 - ii. If technically feasible, the data subject may request transmission of the data subject's data by JABLOTRON directly to the other controller.
 - iii. The exercise of this right must not adversely affect the rights and freedoms of other persons.
- e. Right to object
 - i. The data subject has the right, on grounds relating to his or her particular situation, to object to the processing of personal data relating to the data subject, based on performance of a task carried out in the public interest or in the exercise of official authority vested in the controller or based on a legitimate interest of JABLOTRON, including profiling based on the relevant provisions regulating such processing.
 - ii. Furthermore, the data subject has the right to object at any time to the processing of personal data relating to the data subject for the purposes of direct marketing, which also includes profiling where applying to such direct marketing.
- f. Automated individual decision-making, including profiling
 - i. The data subject has the right not to be subject to a decision based solely on automated processing, including profiling.
 - ii. JABLOTRON states that it does not carry out any automated decision-making without the influence of human assessment with legal effects for data subjects.
- g. Right to withdraw consent to personal data processing
 - i. The data subject has the right to withdraw at any time his or her consent to the processing of personal data relating to the data subject. Withdrawal must be made through an explicit, clear and definite manifestation of will.
- h. Right to contact the Office for Personal Data Protection
 - i. The data subject has the right to lodge a complaint with the supervisory authority if the data subject believes that Regulation has been violated by the processing of the data subject's personal data.
 - ii. The supervisory authority of the Czech Republic is the Office for Personal Data Protection (www.uouu.cz).

IX. The nature of JABLOTRON's request for the provision of personal data

1. The provision of personal data for processing based on consent of the data subject is not mandatory. No consequences for the data subject are associated with non-provision.
2. Provision of personal data in cases where the processing is necessary for the proper fulfilment of a contract is a prerequisite for the conclusion and fulfilment of a contract on the provision of security or other services between JABLOTRON and the customer. Non-provision of data or a request for their erasure may constitute an obstacle to the provision of services.
3. The provision of personal data is mandatory in cases where the provision of such data follows directly from the law. Non-provision may also result in negative consequences for the data subject.

X. Means of personal data processing

1. JABLOTRON processes personal data largely automatically, to a lesser extent otherwise.

JABLOTRON SECURITY a.s.