

## PRIVACY POLICY / GDPR

### **Data protection:**

The protection of your personal data is very important to us. We inform you below about the nature, scope and purpose of the processing of personal data within our online offer and the related websites, functions and content (collectively referred to as “website”).

### Company details:

#### **Plain Organics s.r.o.**

IČO: 075 62 209 Klimentska12/46,  
Prague 110 00,  
Czech Republic (further “Company”).

### **Definitions:**

All information and explanations on the subject of data protection must be easy to read and to understand by all persons. However, as we do not get along without any legal terminology in this document, here are the explanations of the main terms, as they are found in Article 4 of the GDPR:

**Personal data** means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Data subject** is any identified or identifiable natural person whose personal data is being processed.

**Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Restriction of processing** means the marking of stored personal data with the aim of limiting their processing in the future.

**Profiling** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in

particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

**Pseudonymisation** means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

**Controller** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

**Processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

**Recipient** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. <sup>2</sup>However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

**Third party** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

**Consent of the data subject** means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

**Personal data breach** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

**Genetic data** means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question.

**Biometric data** means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data.

**Data concerning health** means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status.

**Scope and legal basis of processing:**

The **Plain Organics** complies with article 5 of the GDPR, in particular with paragraph c data minimisation. As a matter of principle, we only collect and use the personal data of our users insofar as this is necessary to provide a functioning website, as well as our content and services.

The **Plain Organics** uses Article 6 of the GDPR as the legal basis for the data processing. This means that the **Plain Organics** only processes personal data if one of the following aspects is given:

- The data subject has given his/her consent to the processing of the personal data concerning him/her for one or more specific purposes
- The processing is necessary for the performance of a contract to which the data subject is a party or for the performance of any pre-contractual action taken at the request of the data subject
- Processing is required to fulfil a legal obligation to which the controller is subject
- Processing is necessary to protect the vital interests of the data subject or any other natural person
- The processing is necessary for the performance of a task which is in the public interest or in the exercise of public authority and has been delegated to the controller
- Processing is necessary to safeguard the legitimate interests of the controller or a third party, unless the interests or fundamental rights and freedoms of the data subject requiring the protection of personal data prevail, in particular where the data subject is a child

**Storage period and deletion:**

Personal data of a data subject will be deleted or blocked as soon as the purpose of the storage is no longer necessary. In addition, storage may be carried out if required by law, such as e.g. legal storage periods.

Blocking or deletion of the data also takes place when a storage period prescribed by the standards mentioned expires, unless there is a need for further storage of the data for conclusion of a contract or fulfilment of the contract.

**Rights of the data subjects:**

If the **Plain Organics** processes your personal data, as the person affected, regarding **Plain Organics**, you have the following rights:

**Right to information:**

According to the GDPR, every data subject has the right at any time to obtain information from the data controller about the personal data stored about him/her, such as:

- Identity and the contact details of the controller and of the data protection officer
- Purpose and legal basis of processing
- Categories of your processed personal data
- Recipient or category of recipients of your personal data
- Intention of the person responsible to transfer your personal data to a recipient in a third country
- Storage period of your personal data
- The right of rectification or erasure of your personal data or restriction of processing by the controller or a right to object to such processing
- The existence of a right of appeal to the competent supervisory authority
- If your personal data has not been collected from you personally, all available information about the origin of the data
- The existence of automated decision-making, including profiling, as referred to in Article 22 (1) and (4) and, at least in these cases, meaningful information about the logic involved and the scope and intended impact of such processing on the data subject.

**Right to erasure:**

According to Article 17 GDPR, every data subject has the “right to be forgotten”, meaning he may require the controller to delete the personal data concerning him/her without delay. The responsible person is obliged to delete personal data immediately, if one of the following reasons applies and no legal retention periods preclude it:

- The personal data are no longer necessary for the purposes for which they were collected or otherwise processed.
- The data subject withdraws the consent on which the processing referred to in Article 6 (1) (a) or Article 9 (2) (a) was based and any other legal basis for the processing is lacking.
- The data subject objects to the processing in accordance with Article 21 (1) and there are no legitimate grounds for processing, or the data subject objects to the processing in accordance with Article 21 (2)
- The personal data were processed unlawfully.

- The erasure of personal data is required to fulfil a legal obligation under Union or national law to which the controller is subject.
- The personal data have been collected in relation to information society services offered pursuant to Article 8 (1).

**Right to restriction of processing:**

According to Article 18 of the GDPR, each data subject has the right to require the person responsible to restrict the processing if one of the following conditions applies:

- The accuracy of the personal data is contested by the data subject for a period of time enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful and the data subject refuses the erasure of the personal data and instead requests the restriction of use of the personal data.
- The controller no longer needs the personal data for the purposes of processing, but the data subject requires them to assert, exercise or defend legal claims.
- The data subject objects to the processing according to Article 21 (1), and it is not yet clear whether the legitimate grounds of the controller prevail over those of the data subject.

**Right to data portability:**

According to Article 20 of the GDPR, every data subject has the right to receive the personal data concerning him/her, which he/she has provided to a controller, in a structured, conventional and machine-readable format; and he/she has the right to transfer this data to another controller without hindrance by the controller by whom the personal data has been provided, as long as the following issues are fulfilled:

- The processing shall be based on the consent according to Article 6 (1) (a) or Article 9 (2) (a) or in a contract pursuant to Article 6 (1) (b).
- Processing is done using automated procedures.

**Right to reject:**

For reasons arising out of their particular situation, according to Article 21 of the GDPR, each data subject has at any time the right to object to the processing of personal data relating to him/her under Article 6 (1) (e) or (f). This also applies to profiling based on these provisions. The controller no longer processes the personal data unless he can demonstrate compelling legitimate grounds for processing that outweigh the interests, rights and freedoms of the data subject, or the processing is for the purpose of enforcing, pursuing or defending legal claims.

**Right to non-automated decision-making:**

According to Article 22 of the GDPR, any data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which has a legal effect on it or, in a similar manner, significantly affects it. This does not apply, if:

- the decision to conclude or to execute a contract between the data subject and the controller is required
- the decision is permitted by Union or Member State legislation to which the controller is subject, and where such legislation contains appropriate measures to safeguard the rights, freedoms and legitimate interests of the data subject
- the decision is made with the express consent of the data subject

**Right to revoke:**

Any person affected by the processing of personal data has the right to revoke consent to the processing of personal data at any time. You can thus revoke a granted consent to the **Plain Organics** at any time and without stating reasons. However, the revocation does not affect the legality of the processing carried out up until the revocation.

**Asserting your rights:**

All rights listed here can be asserted in writing to our data protection officer. The contact details can be found under point 2 of this privacy policy.

Please understand that we reserve the right to demand further proof of your identity as the person actually affected.

**Right to complain to the Data Protection Supervisory Authority:**

For questions and complaints about data protection, please contact our data protection officer first.

In addition, you have the right to contact the relevant Data Protection Supervisory Authority for the **Plain Organics** at any time:

**Plain Organics s.r.o.**

IČO: 075 62 209

Klimentaska12/46,

Prague 110 00,

Czech Republic

**Used technology and its legal basis:**

Here you will find the description of the technical tools used on our website, which deserve particular attention from a data protection point of view.

**Providing the website while creating log files:**

For the purpose of correctly displaying our website on a variety of systems, we must process certain, automatically transmitted information from you. These data are automatically recorded each time you visit our website and are stored in our server log files. The following information is collected:

- IP address
- Internet Provider of the user
- Browser type and version
- Browser language
- Operating system used
- Inner resolution of the browser window
- Screen resolution and colour depth
- Java On / Off
- Cookies On / Off
- Date and time of access
- Referrer, which is the website from which the user's system accesses our website
- Website that is accessed by the user's system through our website

The collection and processing of this data is absolutely necessary for the provision of our website. Thus, there is no possibility of objection on the part of the person concerned.

**Use of cookies:**

The purpose of the use of cookies is to facilitate the use of websites for users. Cookies are text files that are stored on your computer system by the Internet browser when you visit a website. A cookie contains a specific string that allows the browser to be uniquely identified when the websites are reopened. Some features of our websites cannot be offered without the use of cookies.

As a user, you have full control over the use of cookies, as they are stored on the user's computer and transmitted by the user to our site. By changing the settings in your internet browser, you can disable or restrict the transmission of cookies. Already saved cookies can be deleted at any time. This can also be done automatically. If cookies are disabled for our website, it may not be possible to fully use all the functions of the website.

**Usage of Google Analytics:**

Google Analytics uses cookies. The cookie-generated information about the use of the online offer by the user is usually transmitted to a Google server in the USA and stored there. Because of our interest in the analysis, optimization and economic operation of our

online offer within the meaning of Art. 6 Para. 1 lit. f. GDPR) Google Analytics, a web analytics service provided by Google LLC ("Google").

Google is certified under the Privacy Shield Agreement and thereby offers a guarantee to comply with European data protection law (<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>).

Google uses this information on our behalf to evaluate the use of our online offer by users, to compile reports on the activities within this online offer and to provide us with other services related to the use of this online offer and the internet. Pseudonymous user profiles of users can be created from the processed data.

We only use Google Analytics with activated IP anonymization. The shortening means that the IP address of Google users is shortened within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. In exceptional cases, the full IP address is transferred to a Google server in the USA and shortened there.

The IP address transmitted by the user's browser is not merged with other Google data. Users can prevent the storage of cookies by setting their browser software accordingly; Users can also prevent Google from collecting the data generated by the cookie and relating to their use of the online offer and from processing this data by Google by downloading and installing the browser plug-in available under the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>.

The personal data will be deleted or anonymized after 14 months.

Further information on the use of data by Google, setting and objection options can be found in Google's data protection declaration (<https://policies.google.com/technologies/ads>) and in the settings for the display of advertisements by Google (<https://adssettings.google.com/authenticated>).

#### **Use of Google AdWords with conversion tracking:**

The legal basis is Art. 6 Para. 1 lit. f) GDPR/DSVGO

For our advertising component we use Google AdWords and so-called conversion tracking. We use conversion tracking for targeted advertising of our offer. Our legitimate interest lies in the analysis, optimization and economic operation of our website.



This is a service of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, hereinafter referred to as "Google".

Through certification according to the EU-US Privacy Shield ("EU-US Privacy Shield") <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>

Google guarantees that the EU's data protection requirements will also be complied with when processing data in the USA.

If you click on one of our advertisements placed by Google, a cookie will be saved on your end device because of the conversion tracking we use. Conversion cookies lose their validity after 30 days. Conversion cookies are not used for your personal identification.

Google as well as we can evaluate - as long as the conversion cookie is still valid - and you visit a certain page of our website that you have clicked on one of our advertisements placed with Google and thus came to our website.

With the information received, Google creates a report or statistics about visits to our website. At the same time, this provides information about the number of users who clicked on our advertisement and about the pages of our website that were subsequently called up.

We cannot identify them in this way.

Google also offers at <http://www.google.com/policies/technologies/ads/>, <https://services.google.com/sitestats/de.html>, <http://www.google.de/policies/privacy/> further information and how they can protect your data accordingly.

#### **Usage of contact forms:**

It is also possible for you to contact us using our contact form. The data you provide will be used to process your request. Information about the data for processing and answering your request is required, because without their provision we cannot answer your request.

If your query is finally answered, your data will be deleted and the deletion does not conflict with any statutory retention requirements, such as in the event of a subsequent contract execution.



## Contact

The Service is operated and provided by Plain Organics. If you have questions about these Terms of Use please contact us at

[security@organicwall.eu](mailto:security@organicwall.eu) / +420 791 992 722

Plain Organics s.r.o. Klimentska 1216/46, 110 00, Prague CZ.