



PROCESSING AND PROTECTION OF PERSONAL DATA by Skrivanek s.r.o.

Skrivanek s.r.o. processes the personal data of individuals in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council, which from 25 May 2018 will replace in the Czech legal environment Act No. 101/2000 Coll., on the protection of personal data, according to which we have so far fulfilled our obligations when handling personal data.

What personal data does Skrivanek s.r.o. process about its existing and potential customers from individuals?

- Name and surname (to address you correctly);
- Address (so that we can send you, for example, a legalised translation or discount voucher);
- Phone number (so that we can call you during an ongoing order and inform you, for example, that it will be completed sooner);
- E-mail address:
 - so that we can choose a written form of communication about the ongoing order if we cannot reach you by phone;
 - so that we can send you a questionnaire about your satisfaction with our service after the delivery of an order / fulfilment of a contractual obligation;
 - so that you can receive information about new products, services, discounts or changes in opening hours;
 - so that you receive from us greetings on holidays or information about competitions.

What principles do we follow when processing personal data?

- **Personal data is always processed by us in accordance with the law and now also with the legal regulations of the EU.**

We do not process personal data without the existence of at least one legally valid reason.

Our processing of personal data is carried out completely transparently and properly.

The data subjects (or individual clients) whose personal data we want to process are informed by us about how and with what safeguards we intend to continue processing the data and whether the personal data will be transferred to third parties (for example we must inform the lecturer who will teach you about your language level).

- **We require personal data from clients only for legitimate purposes, in a reasonable range and to the necessary extent.**

To help you learn a foreign language, we do not need to know your age or job position. However, if you give us this information so that we can accordingly choose the correct content of the lessons and the appropriate lecturer, it will go no further from us than to that lecturer. So, do not be afraid to complete the input questionnaire. Its content will remain confidential.



We are aware that we may process your personal data only to the extent necessary in accordance with the specific purpose of its use and you will always know how we have handled it.

➤ **We store and process your personal data only for the time strictly necessary for its processing.**

Skrivanek s.r.o. is the controller of your personal data and its processor only for the time strictly necessary for the fulfilment of the legal grounds of the processing, and once the time limit laid down for its retention or the reasons for its processing expire, we will destroy the data in accordance with our document shredding rules.

➤ **The processing of personal data is subject to rules ensuring its integrity, entirety and confidentiality.**

Skrivanek s.r.o. through its information security management system (we have held the ISMS certificate since 2012) is able to protect personal data against unauthorised handling, processing, misuse, damage, destruction or loss.

We may process your personal data on the basis of the following legal grounds:

- consent to the processing of personal data (the “consent” of the data subject is a free, specific, informed and unambiguous manifestation of will by which the data subject gives permission in the form of a declaration or other apparent confirmation to the processing of his/her personal data)
 - we will always inform you about the specific purposes of the processing of personal data and about the period for which we are going to process them;
 - you can always withdraw your consent;
 - you can always request deletion of your personal data;
- **performance of a contract** to which you are a party as the client (the so-called data subject) or negotiations and arrangements before concluding a contract in response to the client's request;
- **compliance with a legal obligation** that applies to us as a data controller and data processor (for example, the Accounting Act imposes on us the obligation to archive the tax documents on which the data subject's name or address is indicated. Or teaching paid from European funds must be documented in the form of attendance sheets, where the name of the student is also included);
- **the processing of personal data** is necessary for the legitimate interests of Skrivanek s.r.o. (except for cases where these interests are overridden by the interests or fundamental rights and freedoms of you, the clients, requiring the protection of personal data, especially in the case of children)
 - When personal data are processed for direct marketing purposes, the data subject (both existing and potential client) has the right at any time to object to the processing of personal data concerning him/her for this marketing. If this objection is raised, his/her personal data will no longer be processed for this purpose (=> article [12](#)).



How do we collect personal data?

We collect the personal data of individuals exclusively from information provided voluntarily during our mutual contact with the data subjects. We can obtain some personal data from public registers or from the websites of the subjects or from industry-specific websites, where the subjects themselves post their personal data, and we assume that they are publicly accessible with the consent of the client. We do not support trading in personal data and we do not contact potential customers based on personal information obtained illicitly.

We acquire and process the personal data of our clients primarily to fulfil the legal or statutory obligations laid down by the legislation of the Czech Republic and the European Union. The secondary purpose is the operation and development of the company in relation to our clients in cases where the transmission of personal data is necessary for the provision of services (e.g., the language level of students or sending completed orders by e-mail). We also collect data to continually improve our range of services to meet the broadest needs of all existing and new clients. Our priority is the security of your personal data.

We successfully obtained certification of our information security management system according to ISO/IEC 27001 in the year 2012. Therefore, you have been assured for a long time now that your data is safe with us. We protect data and personal information using state-of-the-art technology and in accordance with the standard, compliance with which is reviewed annually via internal as well as external audits.

Do we provide the personal data of our clients to anyone?

Based on a lawful legal reason, we may provide your personal data to the following entities:

State authorities, state and public administration authorities, if a legal obligation to provide them arises.

Based on the fulfilment of contractual obligations, to our suppliers, with whom we have concluded processing contracts:

The translator who reads and translates your text.

The lecturer who sends you homework or a test by e-mail.

Based on our legitimate interest or your consent:

The provider of an e-mail distribution service (with whom we have concluded a processing contract and ensured the security of your personal information for sending our newsletter).

What rights do you have with respect to protection of personal data?

- 1) Our client has the right to be informed about the processing of his/her personal data so that the principle of transparency of processing is complied with: You have the right, among other things, to know:
 - a. the purpose of processing (why we want to process your personal information);
 - b. the identity of the controller (i.e., we, Skrivanek s.r.o.);
 - c. our legitimate interests (why we want to give you the opportunity to stay in touch and send you commercial communications);
 - d. the recipient of your personal data (nothing to worry about, we have concluded processing contracts with our suppliers and we choose them properly).

A full list can be found in [Articles 13](#) and [14](#) of the Regulation. Other rights of the clients whose



personal data we process are based on your activity (request):

- right of access to personal data;
- right to rectification or supplementing;
- right to erasure;
- right to restriction of processing;
- right to data transferability;
- right to raise an objection;
- right not to be subject to automated individual decision-making with legal or similar effects, including profiling.

A more detailed description of individual rights has been prepared by the Office for Personal Data Protection and if you want to explore them more closely, you can find them [here](#).

For how long?

If you have read this far, you will have learnt that we will process your personal data only for the time strictly necessary to achieve the purpose for which it was obtained, for example, from the moment your consent to processing was granted until the termination of the contractual obligations or the expiry of the legitimate reasons which entitled us to the processing.

Want to know even more?

If you have any questions regarding the protection of your personal data and its processing in Skrivanek s.r.o., please send an e-mail to GDPR@skrivanek.com.