

Information on the Processing of Personal Data at Aiviro s.r.o.

This document (hereinafter also referred to as **“Information”**) contains information on the processing of personal data at AIVIRO in accordance with Article 12 et seq. of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter **“GDPR”**) and Act No. 110/2019 Coll., on the processing of personal data.

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

1. INTRODUCTORY PROVISIONS

1.1. IDENTIFICATION AND CONTACT DETAILS OF THE CONTROLLER

Aiviro s.r.o., ID No. 17727987, with its registered office at Purkyňova 670/142, Medlánky, 612 00 Brno, a legal entity established under the laws of the Czech Republic, registered with the Commercial Register maintained by the Regional Court in Brno, Section C, Insert 131220 (hereinafter also referred to as **“AIVIRO”**).

Phone contact: +420 604 254 726, email contact: obchod@aiviro.com

1.2. DATA PROTECTION OFFICER

We have not appointed a data protection officer as we are not a mandatory entity under Article 37 of the GDPR.

1.3. SUPERVISORY AUTHORITY

The supervisory authority is an independent public authority responsible for the protection of personal data in the respective country. The supervisory authority for AIVIRO's registered office is the Office for Personal Data Protection, with its registered office at Pplk. Sochora 27, 170 00 Prague 7, email: posta@uoou.cz, tel.: +420 234 665 125.

1.4. POSITION OF AIVIRO AND SOURCES OF PERSONAL DATA

AIVIRO acts as both a controller and a processor of personal data.

As a controller, AIVIRO processes personal data mainly in relation to customer data – see Section 2 of this Information. Regarding personal data that customers store on AIVIRO servers or otherwise make available, AIVIRO acts as a processor, as it provides data storage space for the purpose of data storage. The controller of this personal data is the customer themselves – see Section 3 of this Information.

2. AIVIRO AS A CONTROLLER OF PERSONAL DATA

AIVIRO acts as a controller of personal data in relation to customer and website visitor personal data.

2.1. PERSONAL DATA PROVIDED BY CUSTOMERS

A customer is an individual (natural or legal person) with whom AIVIRO has entered into or has concluded a contractual relationship for the provision of services or products by AIVIRO.

Categories and purposes of personal data processing

The categories of processed personal data include, in particular:

- Identification data (name, surname, title, date of birth, ID number, VAT number, username and password),
- Address details (residential and business address, email address, phone number),
- Descriptive data (banking information, copies of documents, order history, etc.).

We use customer-provided information and personal data primarily to:

- Provide AIVIRO services and products;
- Contact customers and their representatives and provide them with requested information;
- Fulfill legal obligations, e.g., in accounting and tax matters;
- Fulfill contractual obligations regarding the customer, e.g., technical support and related services, processing of product or service purchases by AIVIRO, subscription management, etc.;
- Invoice our services;
- Send commercial communications to customers, including information on advertising campaigns, events, changes, and new services, etc.; customers can opt out of receiving commercial communications at any time;
- Improve the user experience of AIVIRO's websites or services, including customer support services;
- Maintain records of user data;
- Analyze our business activities and the functioning of AIVIRO services and products, using information from cookies on our websites;
- Protect our legitimate interests (e.g., in potential legal claims against customers).

For legitimate interest reasons, we also process the customer's or their representative's email address to send commercial communications.

2.2. PERSONAL DATA OF VISITORS TO OUR WEBSITES

Purpose of processing and categories of personal data

For legitimate interest reasons, we process: IP address, possibly other online identifiers (for security, website traffic analysis purposes).

More information on handling cookies is provided in the Cookie Policy.

2.3. SPECIAL CATEGORIES OF PERSONAL DATA

We do not process any personal data that can be classified as special categories (sensitive data) within the meaning of Article 9 GDPR. We also do not process personal data relating to criminal convictions and offenses within the meaning of Article 10 GDPR.

3. AIVIRO AS A PROCESSOR OF PERSONAL DATA

AIVIRO provides customers with data storage space for the purpose of data storage within the AIVIRO service, on AIVIRO servers or third parties with whom AIVIRO has a contractual relationship. The customer's data may also include personal data of other individuals (data subjects). In relation to this personal data, AIVIRO acts as a processor of personal data. The controller of this personal data is the customer themselves, who is required to obtain all necessary permissions to do so (including any consents of data subjects).

AIVIRO does not back up data provided in this way in the long term. Availability is limited to the duration of the customer's contractual relationship with AIVIRO.

Notice to end-users: If a customer processes personal data of individuals using the AIVIRO service, data subjects must contact the customer directly regarding data protection issues. We cannot be held responsible for the data protection policies or security measures used by the customer, which may differ from this Information.

Purpose of processing and data handling: We do not perform any operations with customer data, including personal data, other than storing them on our servers; specifically, we do not interfere with, modify, make available, or transfer them to third parties (except for their provision to state authorities in accordance with the law), unless agreed otherwise. The sole purpose of handling this personal data is their storage and the possibility of making them accessible to the customer. Processing of this personal data may also involve maintaining the technical capability of AIVIRO products and services in relation to the customer and providing technical support for the functionality of customer products or services.

Types of processed personal data: It is not possible to determine precisely; most commonly, it involves name, surname, ID number/VAT number, business address, email, phone.

4. RECIPIENTS OF PERSONAL DATA, TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

4.1. OTHER CONTROLLERS OF PERSONAL DATA

We do not transfer personal data to any other controllers of personal data. Personal data processed to fulfill obligations arising from special legal regulations are transferred to state administration authorities or other relevant authorities only when required by law.

4.2. PROCESSORS OF PERSONAL DATA

Area of cooperation	Identification of processor
Cloud services – Google Cloud platform	Google LLC, headquartered at 1600 Amphitheatre Parkway, Mountain View, C 94043, United States All data centers are located within the EU.

Processors may process personal data on our behalf exclusively based on a personal data processing agreement, ensuring organizational and technical security guarantees for such data with defined processing purposes, and processors must not use personal data for other purposes.

4.3. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

We do not transfer personal data to third countries or international organizations within the meaning of Article 44 et seq. GDPR.

5. RIGHTS OF DATA SUBJECTS

In connection with the protection of personal data, you have the following rights. If you wish to exercise any of these rights, please contact us via the contact email. Certain exceptions may apply to the exercise of these rights in some cases, therefore they may not be applicable in all situations. If your request is found to be justified, we will take the requested measures without undue delay, no later than within one month. In justified cases, we may extend this period by an additional two months.

As a data subject, you have the following rights:

Right to access personal data (Article 15 GDPR): You have the right to obtain confirmation from AIVIRO as to whether your personal data is being processed or not. If your personal data is processed by AIVIRO, you have the right to access this personal data and the information listed in Article 15 GDPR. Additionally, you have the right to obtain a copy of the processed personal data. AIVIRO may charge a reasonable fee for additional copies considering administrative costs.

Right to rectification of personal data (Article 16 GDPR): You have the right for AIVIRO to correct your inaccurate personal data without undue delay, or complete incomplete personal data.

Right to erasure of personal data (Article 17 GDPR): You have the right for AIVIRO to erase your personal data without undue delay in cases defined in Article 17 GDPR. The right to erasure does not apply if processing is necessary for compliance with legal obligations, for the establishment, exercise, or defense of legal claims, and in other cases defined in the GDPR.

Right to restriction of processing (Article 18 GDPR): You have the right for AIVIRO to restrict processing in any of the following cases: a) you contest the accuracy of personal data, for a period enabling AIVIRO to verify the accuracy of the personal data; b) processing is unlawful and you oppose the erasure of personal data and request the restriction of their use instead; c) AIVIRO no longer needs the personal data for processing purposes, but you require them for the establishment, exercise, or defense of legal claims; d) you have objected to processing pending the verification of whether the legitimate grounds of AIVIRO override your grounds.

Right to information regarding rectification or erasure of personal data or restriction of processing (Article 19 GDPR): AIVIRO must communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. Upon request, AIVIRO informs you about these recipients.

Right to data portability (Article 20 GDPR): Where technically feasible, you have the right to receive your personal data from AIVIRO and transmit those data to another controller.

Right not to be subject to automated individual decision-making, including profiling (Article 22 GDPR): AIVIRO does not carry out automated individual decision-making or profiling within the meaning of Article 22 GDPR when processing personal data.

Right to be informed of a personal data breach (Article 33 GDPR): If there is a likely risk to your rights and freedoms from a certain personal data breach, AIVIRO will inform you of this breach without undue delay.

Right to lodge a complaint with a supervisory authority: If you believe that AIVIRO is processing your personal data unlawfully, you have the right to lodge a complaint with the supervisory authority whose contact details are provided above. We would appreciate it if you contact us first. We will do everything in our power to rectify any issues and process your personal data lawfully.

Right to object to processing (Article 21 GDPR): You have the right to object at any time to the processing of your personal data by AIVIRO for reasons related to your particular situation, unless AIVIRO demonstrates compelling legitimate grounds for processing which override your interests, rights, and freedoms, or for the establishment, exercise, or defense of legal claims.

Right to object to processing for direct marketing purposes (Article 21 GDPR): If AIVIRO processes your personal data for direct marketing purposes, you have the right to object at any time to such processing. In such a case, AIVIRO will no longer process your personal data.

Right to withdraw consent for processing personal data: If AIVIRO processes any personal data based on consent, you have the right to withdraw your consent in writing at any time by sending a withdrawal of consent to the contact email address. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

6. PROCESSING PERIOD OF PERSONAL DATA

Personal data processed for fulfilling obligations arising from special legal regulations are processed for the period stipulated by these legal regulations. If it is necessary to use personal data for the protection of our legitimate interests, then these personal data are processed for the period necessary to assert these rights. If personal data are processed based on consent, processing is carried out only for the period for which consent has been given.