Description of the information duties to be published on DOMYNAPRAMENECH.cz

**LAYER I**

**Personal data protection**

On this page you can find out everything about the personal date processing we do, including the details of your rights and how to exercise them. You will find more detailed information about the types of processing, your rights and how to exercise them under the respective links.

1. [Suppliers, or their representatives](#b)
2. [Clients, or their representatives](#c)

**LAYER II**

**Basic features of processing**

1. **Suppliers, or their representatives –** processing of the personal data of the company’s business partners or their representatives for fulfilling the company’s contractual and legal obligations (performance of a contractual relation) and for exercising and protecting the company’s rights and legal interests.

Comprehensive information on processing is available [**HERE**](#e)**.**

1. **Clients, or their representatives –** processing of the personal data of clients (buyers, prospective buyers) for the purpose of fulfilling contracts with customers (reservation, future, purchase contracts), or processing of the data of clients’ representatives (e.g. contact persons) for the purpose of fulfilling contracts with customers.

Comprehensive information on processing is available [**HERE**](#f).

**LAYER III - Specific parameters of personal data processing**

1. **SUPPLIERS**
2. **ADMINISTRATOR**

The personal data administrator is **PRAMENY 2020, a.s..,** with registered office at: Na Okraji 335/42, 162 00 Prague 6 – Veleslavín, ID no.: 27121615, entered in the Commercial Register maintained by the Municipal Court in Prague, section B, file 9134 (hereinafter *“the* ***Administrator****”*).

1. **YOUR RIGHTS**

You have the following rights in connection with the processing of your data:

* 1. ACCESS – the right to information whether your personal data are being processed or not. If they are, you also have the right to the prescribed range of information about the processing and the right, under certain conditions, to obtain a copy of the data being processed;
	2. RECTIFICATION – the right to demand rectification if the personal data being processed are inaccurate. Or, where appropriate, the right to demand that additional data are supplied if the data are incomplete.
	3. ERASURE (the right to be forgotten) – the right to demand the erasure of the data on the conditions laid down by law (revocation of consent, termination of a contract, unlawful processing);
	4. PROCESSING RESTRICTION – the right to demand to mark and possibly restrict (suspend) the processing until the accuracy of the data or the lawfulness of processing are checked, until an objection is dealt with or to protect your interests (exercise or protection or defence of rights and legal interests);
	5. COMPLAINT – the right to lodge a complaint with the Office for Personal Data Protection against the Administrator, the processing or the conditions for exercising rights. For contact details and other information about the Office go to [www.uoou.cz](http://www.uoou.cz);
	6. PORTABILITY – the right, under the conditions laid down by law, to receive the data for further processing by a person of your choosing to whom you will transfer the data, or to demand that the data are transferred directly to the other person for processing.
1. **PURPOSE OF PROCESSING**

The Administrator processes personal data for the following purpose: fulfilment of contractual relations and legal obligations (invoicing and taxes).

1. **LEGAL BASIS OF PROCESSING**

The legal basis for personal data processing is the performance of a contract with the data subject (Article 6(1)(b) of the General Regulation).

1. **EXTENT OF DATA to be processed**

For the purpose defined above, the Administrator processes the following personal data: in the case of natural persons (self-employed persons): name, surname, address of place of business, ID no., tax number, e-mail address, telephone number. in the case of employees of a legal person: name, surname, position, e-mail address, telephone number.

1. **PROVISION OF DATA IS OBLIGATORY/ESSENTIAL**

The provision of personal data is obligatory to the extent of identifying a self-employed person according to the tax regulations and essential to the extent of the e-mail address and telephone number or, in the case of employees of a legal person: name, surname, position, e-mail address, telephone number. Non-provision of these data has the following consequences – a contractual relation will not be established.

1. **PERIOD OF TIME during which personal data are stored and processed**

The Administrator processes personal data for the period of time necessary for fulfilling contractual commitments and subsequently for a period of 4 years after the termination of the contractual relation.

1. **PLACE where personal data will be processed**

The place of personal data processing is the Administrator’s place of business.

1. **THIRD COUNTRIES**

Personal data will NOT be transferred outside the EU as part of data processing.

1. **PROCESSOR**

A personal data processor within the meaning of Article 4(8) of the General Data Processing Regulation or a third party assigned by the Administrator to process personal data may participate in the personal data processing. In such cases, the Administrator minimises the risk of unauthorised access to and destruction, processing or loss of personal data.

1. **AUTOMATED DECISION-MAKING AND PROFILING**

Automated decision-making means decision-making by technological devices or on the basis of the results of work by technological devices without any human involvement.

Profiling means the use of personal data to assess certain personal aspects of a person, e.g. to estimate his/her work performance, economic situation, health, personal preferences, interests, reliability etc.

Automated decision-making will NOT take place in the context of personal data processing.

Profiling will NOT take place in the context of personal data processing.

Information on your rights and how you can exercise them is available **HERE**

1. **DATA ON CLIENTS OR THEIR REPRESENTATIVES**

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	2. RECTIFICATION – the right to demand rectification if the personal data being processed are inaccurate. Or, where appropriate, the right to demand that additional data are supplied if the data are incomplete.
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1. **PURPOSE OF PROCESSING**

The Administrator processes personal data for the following purpose: performance of contractual relations – reservation contracts, future contracts, purchase contracts – Section 1785 et seq. and Section 2128 et seq. of Act No. 89/2012 Coll., the Civil Code, and legal obligations (invoicing, taxes). Processing of customers’ personal data for the purpose of performing contracts with customers, or possibly processing of the data of customers’ representatives (e.g. contact persons) for the purpose of performing contracts with customers.

1. **LEGAL BASIS OF PROCESSING**

The legal basis for personal data processing is the performance of a contract with the data subject (Article 6(1)(b) of the General Regulation) and fulfilment of the Administrator’s legal obligations pursuant to Act No. 563/1991 Coll. and Act No. 235/2004 Coll. (Article 6(1)(c) of the General Regulation).

1. **EXTENT OF DATA to be processed**

For the purpose defined above, the Administrator processes the following personal data: name and surname, date of birth, birth index number, permanent residence, state citizenship, e-mail address, telephone number, descriptive data e.g. bank account number. In the case of employees of legal persons: name, surname, position, e-mail address, telephone number.

1. **PROVISION OF DATA IS OBLIGATORY/ESSENTIAL**

The provision of personal data is obligatory to the extent per the legal regulations referred to in point 4 and essential to the extent of name and surname, date of birth, permanent residence, state citizenship, e-mail address, telephone number, descriptive data; and in the case of employees of legal persons: name, surname, position, e-mail address, telephone number. Non-provision of these data has the following consequences – a contractual relation will not be established.

1. **PERIOD OF TIME during which personal data are stored and processed**

The Administrator processes personal data for the period of time necessary for fulfilling contractual commitments and subsequently for a period of 4 years after the termination of the contractual relation, and to the extent required by the acts on accounting for a period of 10 years.

1. **PLACE where personal data will be processed**

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**LAYER IV**

**Rights and Exercising Rights**

**Article I**

**EXERCISE OF RIGHTS IN GENERAL**

1. **CHANNELS FOR EXERCISING RIGHTS**

On the conditions set out below, rights can be exercised:

* 1. via the Administrator’s data box;
	2. by e-mail to info@bpddevelopment.cz;
	3. by a letter sent to Na Okraji 335/42, 162 00 Prague 6;
	4. in person at the address: Na Okraji 335/42, 162 00 Prague 6;
	5. by telephoning 737 878 777
1. **IDENTIFICATION AND SECURE COMMUNICATION**

**Exercising rights must not harm the rights and freedoms of third parties.** For that reason, the Administrator has the right and the obligation **to identify an applicant for the exercise of rights in essential cases**. For these reasons, the Administrator must choose a secure and reliable form of communication. **The following are regarded as reliable forms communication not requiring further verification of the addressee’s identity:** communication via e-mail messages furnished with a verified electronic signature; communication via data box; communication via a postal services provider where the written material is signed and the signature was officially verified or when the reply is sent directly to the addressee.

1. **ORAL EXERCISE OF RIGHTS**

In exceptional cases, if the authorised person so demands, information may be provided or the exercise of rights may be enabled **orally**. A written record is made of the oral provision of information or oral exercise of rights. A condition of the oral exercise of rights if the person in question is not personally known is that his/her identity must be verified by means of an identity card, passport, driving licence or other document that proves that the rights are being exercised by the person possessing such rights.

1. **APPLICATION IN ELECTRONIC FORM**

If an application is filed, or if rights are exercised via an electronic submission, the reply is also sent in electronic form, unless the person in question requests otherwise.

1. **COSTS**

Information provided to data subjects, the provision of copies to data subjects, all notifications and all actions linked to the exercise of data subjects’ rights are done **free of charge**.

1. **REFUSAL AND FEE**

If a data subject’s application (exercise of rights) is patently unfounded or unreasonable, particularly because it is an identical or largely identical application or an unreasonably extensive application that cannot be dealt with within the legal time limit,

* 1. the processing of the request is conditional on an advance payment **to cover administrative costs** linked to the provision of the requested information or linked to communication or the performance of the requested actions – an advance payment may be requested up to the amount of the expected costs, with the understanding that the information, communication etc. will be provided to the data subject only after the incurred costs have been paid in full; or
	2. **the application is rejected**, or **the exercise of rights is rejected in writing, giving reasons**.
1. **APPLICATION PROCESSING TIME LIMITS**

Applications by data subjects and replies to the exercise of rights by data subjects are processed without delay. A reply containing the requested information or describing what measures have been taken in response to a data subject’s application etc. must be delivered to the data subject no later than 30 days after the day on which the application was delivered. If there are serious reasons making it impossible to deal with the matter within the specified time limit, the data subject must be informed in writing or by e-mail by the end of this time limit that the time limit will not be complied with and of the reasons for this, including the actual time limit within which the matter will be dealt with; the time limit may not be extended by more than 60 days.

**ARTICLE II**

**RIGHT TO ACCESS AND COPIES**

1. If the data subject so requests, he/she will be issued with confirmation of whether his/her personal data is being processed or not.
2. If the data subject’s personal data are being processed, the data subject must be provided with information on the following:
	1. the purposes of processing and the legal basis/grounds for the personal data processing, including a reference to the provision of a legal regulation, and the extent and consequences of the processing;
	2. any recipient or category of recipients of the personal data;
	3. the transmission of personal data to third countries, if this is to take place, including information on appropriate guarantees for the security of the data being transmitted to third countries;
	4. the period of time for which personal data will be stored or, if such period of time cannot be determined, the criteria for specifying the storage period;
	5. the right to demand access to personal data concerning the data subject, the right to demand their rectification or erasure, the right to demand that processing be restricted, the right to object to personal data processing and the conditions for establishing rights and the manner in which they are exercised – the data subject must always be provided with information on only those rights that can be exercised in connection with the personal data processing in question;
	6. the right to data portability, the conditions establishing this right and the conditions for exercising this right – if nature of the personal data processing permits the exercise of this right;
	7. the fact that automated decision-making is taking place and the data subject’s rights linked to automated decision-making;
	8. the source of personal data and, where appropriate, the fact that the personal data come from publicly accessible sources;
	9. the right to lodge a complaint with the supervisory authority (Office for Personal Data Protection);
	10. the fact that automated decision-making is taking the form of profiling and the significance and expected consequences of such processing for the data subject, if it is taking place.
3. The data subject has the right to demand a copy of the personal data being processed. The first copy is provided free of charge. A fee is charged for additional copies. Article I(6) applies in this case as well.
4. If the provision of a copy might harm the rights and freedoms of third parties (e.g. the copy contains third parties’ personal data which the data subject requesting the copy has no legal reason to access), the copy must be suitably anonymized. If anonymization is not possible, or if anonymization would cause the requested information to become meaningless, the copy is not provided.

**ARTICLE III**

**RIGHT TO RECTIFICATION**

1. The data subject has the right to rectification of processed personal data if the processed personal data are inaccurate in terms of the purpose of processing or if the personal data are incomplete in terms of the purpose of processing. The data subject may demand the rectification (including the completion) of processed personal data.
2. If the data subject exercises the right to rectification of processed personal data, the Administrator must immediately check the personal data processing in respect of which the right to rectification is being exercised.
3. If the Administrator comes to the conclusion that the objection is justified, if only partially, the Administrator must immediately ensure rectification, i.e. the correction or completion of the processed personal data.
4. The data subject is informed in writing or by e-mail of the result of the inquiry and the measures taken.

**ARTICLE IV**

**RIGHT TO ERASURE**

1. The data subject has the right to have his/her personal data erased by the personal data administrator in the following cases only:
	1. if the personal data are not necessary for the purposes for which they were collected or otherwise processed;
	2. if the data subject revokes his/her consent to the personal data processing and if no other legal basis (grounds) for personal data processing exists;
	3. the data subject has filed a justified objection against the personal data processing;
	4. the personal data were processed unlawfully, and in particular without a legal basis (grounds) for personal data processing;
	5. the erasure of personal data is required by the fulfilment of a legal obligation stemming from a legal regulation or a decision issued on the basis of a legal regulation;
	6. the personal data were collected in connection with an offer of information society services pursuant to Article 8(1) of the General Regulation.
2. Erasure of personal data means the physical destruction of the medium carrying the personal data (e.g. destruction of documents) or their deletion (from multimedia carriers) or other permanent exclusion from further personal data processing.
3. If the data subject exercises the right to erasure, the Administrator reviews the data subject’s request. If the data subject’s request is justified, if only partially, the erasure must be performed to the necessary extent. Article I(7) of this part applies in this case as well.
4. Until the data subject’s request is dealt with, the personal data for which the right to erasure was exercised must be marked.
5. Personal data cannot be erased if their processing is necessary:
	1. for the exercise of the right to freedom of expression and information;
	2. for fulfilling legal obligations stemming from legal regulations;
	3. for reasons of public interest in the field of public health (Article 9(2)(h) and (i) and Article 9(3) of the General Regulation);
	4. for the purposes of archiving in the public interest, for the purposes of scientific or historic research or for statistical purposes, if it is probable that the erasure would prevent or seriously jeopardise the achievement of the goals of the aforesaid processing;
	5. for the establishment, exercise and performance of the Administrator’s rights.

**Article V**

**RIGHT TO RESTRICTION OF PROCESSING**

1. If the data subject exercises the right to restriction of processing in relation to specific processing of personal data, the Administrator must immediately assess the relevance of the data subject’s request, primarily in terms of whether the conditions for exercising the right to restriction of processing are satisfied; the assessment of the request must be based both on the content of the request and on other circumstances and facts linked to the personal data processing in question.
2. The data subject has the right to restriction of personal data processing in the following cases:
	1. the data subject denies the accuracy of the personal data;
	2. the processing is unlawful and the data subject rejects the erasure of personal data, instead requesting restriction of their use;
	3. the Administrator no longer needs the personal data for processing purposes, but the data subject requests them for the establishment, exercise or defence of legal claims;
	4. the data subject objected against the processing.
3. Personal data concerned by restriction of processing shall be marked.
4. If processing was restricted, such personal data, with the exception of their storage, may be processed solely with the consent of the data subject or for the establishment, exercise or defence of legal claims, for the protection of the rights of another legal person or natural person or for reasons of important public interest.
5. Before restriction of personal data processing is lifted, the data subject must be notified thereof in writing or by e-mail. The notice must state the time when the restriction of processing was lifted and the reason for which it was lifted.

**ARTICLE VI**

**RIGHT TO DATA PORTABILITY**

1. If the data being processed is personal data obtained from the data subject (either data transmitted directly by the data subject or data obtained about his/her activity etc.) and concerning this data subject, the data subject has the right to the portability of such data, where the processing is based on the consent of the concerned data subject or is based on a contract with the data subject and is carried out by automated means. The right to portability does not apply to data and information created by the Administrator on the basis of data obtained from the data subject (e.g. profiling of the data subject’s expected consumer behaviour based on data obtained from the data subject etc.).
2. In the context of the right to portability the data subject may request:
	1. the transmission of the personal data covered by the right to portability in a structured, commonly used and machine-readable format directly to the data subject; in particular, a format requiring a special, paid licence or a format ruling out further editing or other treatment (processing) of the personal data (e.g. \*.pdf);
	2. the transmission of the personal data covered by the right to portability in a structured, commonly used and machine-readable format to another personal data administrator referred to by the data subject in the request for transmission of personal data; in particular, a format requiring a special, paid licence or a format ruling out further editing or other treatment (processing) of the personal data (e.g. \*.pdf).
3. The data subject’s request shall not be carried out *inter alia* (Article I(6)) if carrying out the data subject’s request would harm the rights and freedoms of other persons (data subjects).
4. Requests dealing with data portability pursuant to 2(b) above shall additionally not be carried out if the transmission is not technically feasible, where technical unfeasible is understood to include the kind of transmission which, in view of the available technological possibilities, cannot be secured in a manner suitable for and proportionate to the nature of the personal data being transmitted and other risks.
5. Information on the purpose of personal data processing will be attached to the transmitted personal data and, if the data subject so requests, information on personal data processing to the extent of Article 13 of the General Data Protection Regulation.