



Eleveo Privacy Policy Version 1.3 – Issued January 2024

Eleveo a.s. and its subsidiaries (“Eleveo”) is devoted to protect personal data it obtains to a maximum extent. This Privacy Policy describes in detail how we manage, store and handle your personal data. This Privacy Policy applies to Eleveo website, Eleveo Portal, e-mail communication and documents where the Privacy Policy is referenced.

We process and use your personal data in accordance with the provisions of both Czech legislation (Personal Data Processing Act No. 110/2019 Coll.) and European legislation (Regulation (EC) 2016/679 of the European Parliament and of the Council) and any other applicable legislation (“Data Protection Acts”). Further, Eleveo is ISO 27001 certified.

Section 1. Personal data controller

The controller of personal data within the meaning of Data Protection Acts is:

Eleveo a.s.

Karolinská 650/1

Prague 8

Czech Republic

Registered in Czech Republic under ID No.: 25730151

If you have any questions about the processing and protection of your personal data, please contact us by e-mail at: privacypolicy@eleveo.com.

Section 2. Purposes of processing of personal data

The majority of the personal data that we process with respect to our customers, potential customers, suppliers and other contractors is held by us in connection with offering and providing our services (“Solutions”).

All of the below-mentioned personal data that arises from our mutual communication and interaction are controlled by the internal system of personal data protection in accordance with Data Protection Acts. We control the access to personal data, the technical measures for their security and the duration of their existence to the maximum extent.

Personal Data is any information that relates to an identified or identifiable individual, such as name, address, telephone number, e-mail address, IP address and other.

Contractual purposes

In case we have entered into an agreement, we process necessary personal information to fulfil our contractual obligations and for the duration of the agreement. If we are not provided required personal information, we might not be able to enter into a contractual relationship. Further we might use certain personal data to improve user experience and further develop our products.

Marketing purposes

In the event that you have voluntarily given us a consent to send commercial communications, we process your personal data for the marketing and business development purposes of Eleveo, i.e., in particular for the purpose of offering the products and services of the Company, sending information about organised events, etc. For these purposes we process the following personal data: *name, surname, e-mail address*. Without providing us this information we will not be able to provide you with commercial communications.

You can unsubscribe from commercial communication at any time, either in the context of the commercial communication or by sending an e-mail with the unsubscribe request to [**privacypolicy@eleveo.com**](mailto:privacypolicy@eleveo.com).

Internal & other purposes

If you write to us through a contact form, online chat or a specific e-mail address, we process your personal data only for a necessary period of time for the purpose of handling your demand or your inquiries and comments. In this case, we process your personal information based on a consent.

If you contact us by phone, we monitor your call-in order to evaluate the quality of the information that we offer and that our operators provide for the assessment of services based on the legal grounds of a legitimate interest of the controller.

Eleveo retains certain personal data for internal operations such as finance, business or legal. In such instances we process your personal information based on legal obligation.

Excluded purposes

This Privacy Policy does not apply to employee personal data and personal data of potential employees or contractors. In B2B relationships, applicability of this policy is stated in the particular agreement.

Section 3. Legal basis for processing

Eleveo processes personal data based on following legal basis:

- **Consent** – freely given consent to process your personal data for one or more given purposes.
 - Applies for example for marketing purposes as described above.
 - You can always freely withdraw the consent.
- **Contractual obligations** – personal data necessary to provide Solutions to you.
 - Applies for example for business relationships.
- **Legal obligations** – processing is necessary for compliance with a legal obligation.
 - Applies for example for business relationships (where applicable).
- **Legitimate interest** – processing is necessary for Eleveo with the exception where our interest is overridden by your interests or rights.
 - Applies for example for processing of personal information collected while we are contacted through calls, e-mails or other means.
- **Vital interest** – processing is necessary in order to protect the vital interests of Eleveo or you.

Section 4. Transfer of personal data

We use all personal data collected from our customers and third parties solely for the internal needs of Eleveo, we protect it against misuse, and we do not disclose it to third parties without prior notice or consent.

Exceptions are third party companies that provide support services for us and state authorities. We may but are not obliged to provide your personal data to these entities to the minimum extent, for example, in the following cases:

- investigation of an unlawful use of our services or for the purposes of legal proceedings, data may be submitted to the law enforcing authorities,
- managing our information systems and applications.

We contractually require from all service providers (excluding public administration authorities) that they process your personal data in accordance with the terms of personal data protection and Data Protection Acts.

Section 5. Period for which we process your personal data

We process and store the personal data of our customers and third parties for the strictly necessary period to ensure all rights and obligations arising from the contract, and then for the period that we are required to keep data in accordance with the generally binding legal regulations.

We process any personal data obtained on the basis of your voluntary consent for the purpose of sending commercial communications until you withdraw your consent. You can always withdraw your previously given consent by contacting us at privacypolicy@eleveo.com.

Section 6. Your rights

Eleveo will provide you with information about any personal data of you that we process. Please contact us at privacypolicy@eleveo.com for any inquiries regarding our processing of personal data.

Regarding processing of personal data, you have following rights:

- Right to be informed about personal data of you we process and access it
- Right to rectification – we will correct any personal data that is not correct or actual
- Right to erasure
- Right to data portability
- Right to restriction of processing
- Right to lodge a complaint with a supervisory authority

If you have given us consent to the processing of your personal data for the purpose of sending commercial communications, you may withdraw this consent at any time.

If you believe that we do not handle your data adequately and in accordance with legal regulations, you can lodge a complaint with the supervisory authority, which is the Office for Personal Data Protection.

We do not perform any data profiling.

Section 7. Cookies

Cookies are small text files that are stored on your device (computer, mobile device, or other device allowing Internet access) through which you use our website, and unless you delete them after leaving our website, they are used again on your next visits. We use cookies to improve the functionality of our website and to simplify your next visit, and especially for the following activities:

- **Saving preferences and settings** – these settings allow our website to function properly.
- **Login and authentication** – if you do not want to log in and log out all the time, you do not have to thanks to cookies.
- **Security** – we use cookies to detect fraud and the misuse of our website.
- **Analyses** – by using cookies, we collect data for our analytical tools.
- **Marketing** – we use cookies to evaluate our marketing campaigns or to address customers.
- **Social networks** – you can share some of the content from our website with your friends.

Despite the above, we are not able to identify you to the level of a specific natural person based on the cookies.

How to refuse the use of cookies?

We always ask you for consent before we place cookies in your device. Once placed, you can easily delete cookies from your computer or from another device using your browser. For instructions on how to handle cookies and how to remove them, see the “Help” menu of your browser. However, in this case it is possible that some parts of our website will not be correctly displayed, viewing them will be more difficult for you and you will not be able to see the product offers corresponding to your needs.

Section 8. Analytical web tools

Statistical data

If you use our website, we collect statistical data about your activity, which we further use to improve our services.

Google Analytics



A service that provides an analysis of our website. It is provided by Google Inc. (“Google”). The information generated when using our website is transferred to Google servers, where it is stored. Google uses this information to analyse user behaviour on our website and then provides this analysis to us.

Adwords

This service is a marketing tool that allows us to offer our services to new or existing customers. It is provided by Google. To work properly, the service uses cookies.

Section 9. Eleveo APR third party integrations

Eleveo APR does not process any personal data while integrated with third party applications.