

# Privacy policy regulations of the LOKNI service

Your privacy is our priority. We consider the protection of your personal data to be part of our social responsibility. Therefore, we would like to provide information about how we process your personal data within the framework of providing services related to the LOKNI and LOKNI application (hereinafter referred to as "**services**" and "**application**").

## I. Basic provisions

1. The administrator of personal data according to article 4 point 7 of the regulation of European parliament and council (EU) 2016/679 on protection of natural persons in relation with processing personal data and on free movement of these data and on the cancellation of the regulation 95/46/ES (general data protection regulation)(hereinafter referred to as "**GDPR**") is the company LOKNI s.r.o. IČO 02508991 based in Vratislavova 4/27, Praha 2, PSČ 128 00 (hereinafter referred to as "**administrator**").
2. The contact details of the administrator are  
address: Vratislavova 4/27, Praha 2, PSČ 128 00  
e-mail: info@lokni.cz  
phone: +420 725 122 310
3. Personal data are considered to be all the information about the identified or identifiable natural person; the identifiable natural person is such a natural person which can be directly or indirectly identified, namely by a link to a certain identifier, such as name, e-mail, location details, network identifier or to one or more special features of the physical, physiological, genetic, psychic, economic, cultural or social identity of this natural person.
4. The administrator did not appoint the representative for personal data protection.

## II. Sources and categories of the processed data

1. The administrator processes the personal data which you have provided or such personal data which the administrator has obtained when providing the services.
2. The administrator processes your identification and contact details as well as the data necessary for the performance of contract concluded in the sense of the Terms and conditions of the LOKNI services - <https://lokni.cz/vop>, and in particular:

- e-mail;
- first name (or nickname);
- sex;
- ID of the device;
- unique user ID which is generated for each installation of the application, and
- the operation data about using the network of filtration devices.

When purchasing the bottle or any other accessories or free sponsored tariffs, the administrator processes also:

- first name and surname;
- phone number;
- address for goods delivery.

When displaying the location of the filtration device in a map or when the function of active search for the filtration device in a map is switched on your current location can be also processed. However, the data on your current location are not stored anyhow or anywhere.

### **III. Legal reason and purpose of processing your personal data**

1. The legal reason for processing the personal data is

- performance of the contract between you and the administrator according to article 6 paragraph 1 letter b) of GDPR;
- justifiable interest of the administrator in providing direct marketing (namely displaying advertisement directly in the application and in case of a sponsored tariff also sending business communication and newsletters) according to article 6 paragraph 1 letter f) of GDPR;
- your agreement with processing the data for the purpose of providing direct marketing (namely sending the business communication and newsletters) according to article 6 paragraph 1 letter a) of GDPR in connection with § 7 paragraph 2 of the act No. 480/2004 of the legal code, on some services of an information company in case there was no order of goods or services.

2. The purpose of processing the personal data is

- the execution of your order, providing services and performance of the rights and obligations following the contracted relationship between you and the administrator, without providing the personal data it is not possible to conclude the contract or perform it on the side of the administrator; and
  - sending business communication and performing other marketing activities.
3. If you purchase our goods or services, your name (or nickname), surname, e-mail address and phone number can be used to send you business communication which will inform you about goods or services we provide and you could be interested in. You can anytime cancel the delivery of business communication via the link in the e-mails or by sending a message to [info@lokni.cz](mailto:info@lokni.cz).
  4. On the side of the administrator the automatic individual decision making in the sense of article 22 of GDPR does not take place. You have agreed explicitly with such processing of the data.

#### **IV. The period of storing your personal data**

1. The administrator stores personal data
  - for the period of time necessary to perform the rights and obligations following the contractual relation between you and the administrator and to lay claim following the contractual relations, i.e. for the period of ten years from the termination of the contractual relation; or
  - if the personal data are processed based on the agreement, for the period of time until the agreement to process personal data for marketing purposes is withdrawn, or for 5 years at most.
2. The administrator will erase the data after the end of the period of storing personal data.

#### **V. Recipients of personal data (subcontractors of the administrator)**

1. We do not transfer your personal data to our business partners operating parts of the network of filtration devices or to the sponsors of individual tariffs.
2. The recipients of personal data are only the persons involved in:
  - the operation of the e-shop portal (Shoptet, a.s., Dvořeckého 628,8, 169 00 Prague 6, ID: 28935675)

- delivering the goods (Zásilkovna s.r.o., ID: 284 08 306, based in Lihovarská 1060/12, 190 00 Praha 9, PPL),
  - realization of the payments (GOPAY s.r.o., ID: 260 467 68, Planá 67, 370 01 Planá, APPLE PAY) based on a contract,
  - mailing services (service Steablo from Webglobe, s.r.o., Vinohradská 190/2405, 130 61 Praha 3 – Vinohrady, IČO: 26159708, DIČ: CZ26159708).
3. The administrator has no intention to transfer personal data into a third country (i.e. a country out of EU) or to an international organisation.

## **VI. Your rights**

1. Based on the conditions stated in the GDPR act you have the
- right to access your personal data according to article 15 of GDPR,
  - right to correct your personal data according to article 16 of GDPR, or restrict their processing according to article 18 of GDPR,
  - right for erasure of your personal data (including the cancellation of your registration) according to article 17 of GDPR,
  - right to raise an objection against their processing according to article 21 of GDPR (if your personal data is being processed based on the article 6 paragraph 1 e) or f) of GDPR),
  - right to transfer your data (which you have provided the administrator with) according to article 20 of GDPR, and
  - right to withdraw your agreement with processing the data in a written form or electronically to the address or e-mail of the administrator.
2. Should you believe that your right for the protection of your personal data has been violated you have the right to complain at the Office for Personal Data Protection, as it is the relevant body of supervision.

## **VII. Conditions of personal data security**

1. The administrator claims that he has adopted all possible and suitable technical as well as organisation measures in order to protect the personal data. At the same time we would like to remind you that no method of transferring the data on the Internet is 100% secure and reliable and therefore it is not possible to provide absolute security of your personal data.

2. The administrator has adopted technical measures to protect the data storage and the storage of the personal data in paper form, namely: passwords, secured operation system, using encrypted data communication and encrypting of the storages and keeps the antivirus programme as well as all the other software updated.
3. The administrator claims that only persons appointed by him have access to personal data and only to the necessary extent.

## **VIII. Final provisions**

1. By confirming the registration in the application you confirm that you are acquainted with these privacy policy regulations and that you fully accept it.
2. By submitting an order from the online order form, you confirm that you are familiar with the terms of personal data protection and that you fully accept it.
3. You agree to these terms and conditions by ticking the consent through the internet form. By checking consent, you confirm that you are familiar with the terms of personal data protection and that you fully accept it.
4. The administrator is entitled to change these privacy policy regulations. The new version of the conditions of personal data protection will be published on their website.
5. Your above-mentioned rights as well as any questions or complaints can be claimed at the e-mail address [info@lokni.cz](mailto:info@lokni.cz) or by means of the other contact details mentioned in article I of these regulations.

These privacy policy regulations come to effect on 2<sup>nd</sup> April 2024.