

In accordance with 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 (General Data Protection Regulation) (hereinafter referred to as the "GDPR Regulation") and Act No. 110/2019 Coll., on the processing of personal data, as amended, you, as data subjects, are hereby provided with the information below, in particular about (i) what personal data we collect, (ii) how we handle this data, (iii) on the basis of which legal bases we process personal data and for what purposes we use personal data, (iv) to whom we are authorised to provide this personal data, (v) what your rights are in the area of personal data protection, as well as (vi) where you can obtain information about your personal data that we process.

We would like to ask you to familiarize yourself with the content of this Privacy Policy ("Principle"). We are ready to answer any questions you may have at the contact email info@qpag.cz, or at the address Kaštanová 530/125b, 620 00 Brno.

These Principles, which contain general principles for the processing of personal data, are intended for all natural persons whose personal data our company processes, in particular clients, business partners, job applicants, users of our company's websites, etc.

a. General information Identity of administrators:

QPAG Digital s.r.o.

(each referred to as the "company" or also "administrator") Contact details of the administrators:
Contact address: Kaštanová 530/125b, 620 00 Brno Contact e-mail info@qpag.cz Contact phone: +420 733 689 319

b. information about processing The Company, as the personal data controller, handles your personal data in accordance with applicable law and always in such a way as to ensure the security of your data (personal data) to the maximum extent possible. The Company adheres to the principles of personal data processing set out in applicable law and fully respects the highest standards of personal data protection.

The company does not have a data protection officer within the meaning of the GDPR.

Purposes of personal data processing. Legal basis for processing personal data:

The controller processes your personal data only to the extent necessary for the given purpose and for the period necessary to fulfil the given purpose. After fulfilling the relevant purpose, the controller may process your personal data for purposes other than those for which they were collected; the controller will always inform you of these other purposes.

Processing of personal data without your consent:

The administrator processes personal data without your consent for the following purposes and on the basis of the following legal grounds:

fulfillment of the controller's contractual obligations, including fulfillment of the obligation to provide performance under the contract (period of storage of personal data: for the duration of the contract; legal reason for processing: fulfillment of the contract),

fulfillment of the administrator's legal obligations, including, for example, processing the offer.

the possibility of exercising and enforcing legal claims of the administrator, authorized recipients or other relevant persons, or the protection of legal claims, including the enforcement of legal claims, the development and evolution of the products and services provided, the resolution of disputed issues, in particular for the purposes of conducting legal or other disputes (period of storage of personal data: personal data are processed until 1 year from the end of the relevant limitation period, or for the period necessary for the purposes of implementing the protection of legal claims; legal reason for processing: legitimate interest of the administrator or a third party),

management and processing of the administrator's recruitment agenda (period of storage of personal data: a) in the event that the applicant succeeds in the selection procedure and becomes an employee: for the duration of the employee's employment relationship, b) for other purposes related to the recruitment agenda: until 1 year from the end of the limitation period, or further for the period necessary for the purposes of implementing the protection of legal claims; legal reason: (i) fulfillment of the contract (processing for the conclusion of the contract), (ii) legitimate interest of the administrator),

processing is necessary for the purposes of the legitimate interests of the controller or a third party (e.g. for the purposes of so-called offer processing), except in cases where these interests are overridden by the interests or fundamental rights and freedoms of the data subject requiring the protection of personal data.

Personal data categories:

For the above purposes, the company processes your:

identification data and contact information, i.e. e.g. name, surname, title, date of birth, telephone number, e-mail address, address (residence, delivery or other contact address), in the case of a natural person entrepreneur also the business name, registered office and ID/VAT number, etc.

other personal data, i.e. e.g. bank details (bank account number), IP address, etc.,

personal data related to the recruitment agenda, i.e., for example, identification and contact data, data on educational attainment, data on language proficiency, or data on previous employers, as well as other personal data related to the recruitment agenda.

The legal basis for processing your personal data is (see above):

compliance with a legal obligation to which the controller is subject (Article 6(1)(c) of the GDPR)

fulfillment of obligations under a contract concluded with the entity as a data subject (Article 6(1)(b) of the GDPR)

legitimate interest of the controller or a third party (Article 6(1)(f) of the GDPR)

consent to the processing of personal data, if given by the data subject (Article 6(1)(a) of the GDPR)

Automated decision-making and profiling:

There is no automated decision-making or profiling when processing personal data.

Use of cookies:

temporary cookies (session cookies), which may be used on the administrator's website to support some add-on functions and which are deleted immediately after closing the browser,
permanent cookies, which remain stored on the device until they reach a specified expiration date and time, usually one year or until they are deleted by the user,
functional and technical cookies, which primarily ensure the proper functioning of the website, storing set preferences or capturing information about displaying error messages,
analytical cookies, which are used for statistical purposes, in particular for collecting information about the use of the administrator's website (e.g. number, duration and time fluctuation of visits, number of pages viewed, proportion of new visits, etc.).

c. your rights related to the processing of personal data Right of access to personal data (Article 15 of the GDPR):

As a data subject, you have the right to obtain from the controller confirmation as to whether or not personal data concerning you are being processed and, if so, you have the right to access those personal data and the following information about:

- a) the purposes of processing,
- b) the categories of personal data concerned,
- c) the recipients or categories of recipients to whom the personal data have been or will be disclosed,
- d) the planned period for which the personal data will be stored, or if it is not possible to determine this period, the criteria used to determine this period,
- e) the existence of the right to request from the controller the correction or deletion of personal data, the restriction of their processing or the right to object to such processing,
- f) the right to file a complaint with the supervisory authority (Office for Personal Data Protection),
- g) all available information about the source of the personal data,
- h) whether automated decision-making, including profiling, is carried out, the procedure used, as well as the significance and envisaged consequences of such processing.

fulfillment of obligations under a contract concluded with the entity as a data subject (Article 6(1)(b) of the GDPR)

legitimate interest of the controller or a third party (Article 6(1)(f) of the GDPR)

consent to the processing of personal data, if given by the data subject (Article 6(1)(a) of the GDPR)

Your personal data may be processed manually and automatically directly by the controller's authorized employees and further by processors authorized by the controller on the basis of a personal data processing agreement.

Source of personal data:

The Company, as the controller, obtains personal data of data subjects (i) from data subjects (e.g. (a) from requests and questionnaires from data subjects, (b) in negotiations with the data subject regarding the conclusion of a contract, (c) from forms filled in by the data subject or (d) in communication (personal or written) with data subjects, including communication by electronic means), (ii) from third parties (e.g. (a) from public authorities, (b) from cooperating third parties, (c) from third parties in the performance of the controller's legal obligations, (d) on the basis of special legal regulations, (e) from third parties also in the case where the data subject provides security for the obligation of the controller's client) or (iii) from publicly available sources (e.g. from public registers). If the controller obtains personal data from data subjects, it informs the data subjects whether the provision of personal data is a legal or contractual requirement and whether the data subject is obliged to provide personal data, as well as the possible consequences of failure to provide personal data.

Beneficiary, beneficiary category:

Your personal data may be transferred in justified cases, in particular to the following categories of recipients:

to public authorities and other entities to which the company is obliged to disclose your personal data, or which are authorized to request your personal data from the company (e.g. tax administrators, customs authorities, bailiffs, insolvency administrators, courts, criminal prosecution authorities, etc.),

to third parties with whom the company has concluded a written contract for the processing of personal data, i.e. processors (e.g. IT and marketing service providers, accounting service providers, auditors, tax advisors, lawyers, etc.),

the company's business partners,

entities related to the company,

other entities (e.g. insurance companies).

Alternatively, your personal data may be made available to third parties for other reasons in accordance with applicable law. The Administrator does not intend to transfer personal data to third countries outside the EU/EEA or to an international organization.

If personal data is transferred to a third country outside the EU/EEA or an international organisation, you have the right to be informed of the appropriate safeguards that apply to the transfer.

The controller will provide you with a copy of the personal data being processed. The controller is entitled to charge a reasonable fee for further copies based on administrative costs. The right to obtain a copy must not adversely affect the rights and freedoms of other persons.

Right to rectification (Article 16 of the GDPR):

As a data subject, you have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you also have the right to have incomplete personal data completed, including by providing a supplementary statement.

Right to erasure (Article 17 of the GDPR):

As a data subject, you have the right to obtain from the controller the erasure of personal data concerning you without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed,
- b) you have withdrawn the consent on the basis of which the data was processed and there is no other legal basis for the processing,
- c) the data subject has objected to the processing, if the objection is permissible under the GDPR and there are no overriding legitimate grounds for the processing,
- d) personal data have been processed unlawfully,
- e) personal data must be deleted to comply with a legal obligation,
- f) the personal data were collected in connection with the offer of information society services pursuant to Article 8(1) of the GDPR.

The right to erasure shall not apply where a statutory exception is provided, in particular where the processing of personal data is necessary (a) for compliance with a legal obligation which requires processing under Union or Member State law to which the controller is subject, or (b) for the establishment, exercise or defence of legal claims.

Right to restriction of processing (Article 18 GDPR):

As a data subject, you have the right to obtain from the controller restriction of processing in any of the following cases:

- a) you dispute the accuracy of the personal data – in such a case, processing will be limited to the period necessary for the controller to verify the accuracy of the personal data,
- b) the processing is unlawful and you refuse the deletion of personal data and instead request the restriction of their use,
- c) the controller no longer needs the personal data for the purposes of processing, but you require these personal data for the determination, exercise or defence of legal claims,

d) the data subject has objected to the processing pursuant to Article 21(1) of the GDPR – until it is verified whether the legitimate grounds of the controller override those of the data subject.

If processing has been restricted, these personal data may only be processed, with the exception of their storage:

a) with the consent of the data subject,

b) for the purpose of establishing, exercising or defending legal claims,

c) for the purpose of protecting the rights of another natural or legal person, or

d) for reasons of important public interest of the European Union or of any

Right to data portability (Article 20 GDPR):

As a data subject, you have the right (subject to the conditions set out in Article 20 of the GDPR) to obtain the personal data concerning you which you have provided to the controller on the basis of consent or for the performance of a contract. The controller shall, at your request, provide you with the data in a structured, commonly used and machine-readable format or, at your request, provide it to another clearly identified controller, where technically feasible. The right to data portability does not apply to personal data which are not processed by automated means.

The exercise of the right to data portability must not adversely affect the rights and freedoms of other persons.

Right to object (Article 21 GDPR):

As a data subject, you have the right (under the conditions set out in Article 21 of the GDPR) to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on the legitimate interest of the controller. The controller shall not process the personal data unless (i) it demonstrates compelling legitimate grounds for the processing which override your interests or rights and freedoms, or (ii) for the establishment, exercise or defence of legal claims of the controller.

If personal data is processed for direct marketing purposes and you object to the processing, the controller will no longer process the personal data for these purposes.

Right to lodge a complaint with a supervisory authority (Article 77 of the GDPR):

If you believe that the processing of your personal data violates legal regulations/GDPR regulations, you have the right to file a complaint about the controller's actions with a supervisory authority, the supervisory authority for the Czech Republic being the Office for Personal Data Protection, with its registered office at Pplk. Sochora 27, 170 00 Prague 7 (www.uoou.cz). This is without prejudice to any other means of administrative or judicial protection provided for the protection of the data subject by applicable legal regulations.

Right to withdraw consent:

The data subject is not obliged to grant consent to the processing of their personal data to the company. You have the right to withdraw consent to the processing of personal data, granted for the above purposes (or any of them), at any time. Withdrawal of consent does not affect the processing of your personal data before its withdrawal. You can withdraw your consent to the processing of personal data by (i) a signed written notice of withdrawal of consent sent in writing to the company's contact address or (ii) a notice of withdrawal of consent in the form of an e-mail sent to the company's contact e-mail specified above in these Policies.

Please note that we are entitled to process some personal data for certain purposes without your consent. If you withdraw your consent, the company will stop processing the relevant personal data for the purposes requiring your consent for which the consent to their processing was withdrawn, however, the company may be entitled, or even obliged, to continue to process the same personal data on the basis of another legal basis (i.e. another legal reason for processing).

d. information on the processing of personal data of selected data subjects Information on the processing of personal data of job applicants:

This information on the processing of personal data of job applicants does not affect other provisions of these Principles. The Administrator processes personal data that have been transferred to him by the job applicant, made available, or for which the job applicant has given consent (e.g. data contained in a CV or data made available within the framework of servers for sharing applicant data, etc.); the Administrator may also process data obtained as part of the verification of information from publicly available sources (e.g. LinkedIn). However, this is always strictly necessary data that, to an adequate extent according to applicable legal regulations, serves for the purposes of verifying the job applicant, in particular the verification in relation to the data provided in the CV.

In addition to identification and address personal data, the administrator processes information on language skills, education of the applicant, previous work experience of the applicant, etc. However, the primary source of personal data is the data subject. If the applicant does not give consent, the applicant can only be contacted on the basis of the data made available by the applicant for this purpose (i.e. personal data that the applicant has published about himself/herself for this purpose). The applicant can only be included in the administrator's databases on the basis of the consent given by the applicant. If the data subject has not given consent, the administrator will not further process the personal data of such a data subject, and after a reasonable period of time for which the administrator will have stored basic data regarding (i) the circumstances and (ii) the reasons for which the data subject was contacted, this data will be destroyed. Contacting references of job applicants is permissible with the consent of the applicant. The applicant/candidate may revoke the consent(s) granted at any time at the above-mentioned contact address or contact email of the administrator.

The personal data of the job applicant are used by the administrator for the purpose of selecting a suitable candidate for a given job position. In the event that the applicant is successful in the selection procedure and a contract establishing an employment relationship between the administrator and the applicant is concluded with this job applicant, the personal data provided by the applicant (in particular the CV) will become part of his/her personal file as an employee. After the selection procedure is completed, the administrator will ensure the destruction of the personal data of those job applicants who were not selected/hired for the given job position. The administrator is entitled to use communication (paper or e-mail) with the applicant regarding the given selection procedure (i) for the purposes of his/her legitimate interests (protection of the administrator's legal claims, or for the purposes of IT security - in particular the administrator's website and network), or also (ii) for the purposes of fulfilling the administrator's legal obligation (e.g. to document the applicant's consent to the processing of personal data, etc.) The legal reason for processing personal data is:

performance of a contract (processing for the purpose of concluding a contract) consent given by the data subject,

legitimate interest of the administrator or a third party,

fulfillment of the legal obligation that applies to the controller (including proof of obtaining consent).

Beneficiary categories:

IT service providers (IT technical support services, provision of server services, provision of programming services, etc.),

suppliers of external recruitment services, providers of legal services, providers of accounting services, providers of economic services, and possibly also providers of tax consultancy or audit services,

public authorities.

In connection with the recruitment agenda, personal data is processed both on the basis of consent granted by the data subject and in connection with a "non-consent" agenda, i.e. in the case where the legal basis for processing is given by (i) the fulfillment of a contract (or processing for the conclusion of a contract), (ii) the fulfillment of a legal obligation of the controller, or (iii) the legitimate interests of the controller or a third party.

The provision of personal data for processing based on consent (i.e. in particular for the purposes of including the applicant in a future (next) selection procedure) is completely voluntary and the data subject is not obliged to give consent; however, without providing consent, it will not be possible to include the data subject (candidate) in a future (next) selection procedure.

Period of storage of personal data: for the purposes of the selection procedure (selection of a suitable candidate), the administrator processes the personal data of applicants for a period of 6 months from the date of filling the given job position or cancellation of the given selection procedure. In the event that the applicant succeeds in the selection procedure (and becomes an employee), his/her CV (as part of the employee's personal file) will be processed for the duration of the employee's employment relationship.

For other purposes related to the recruitment agenda, when the controller processes personal data on the basis of a legitimate interest, the data is stored until 1 year from the end of the limitation period, or for the period necessary for the purposes of protecting the controller's legal claims.

Further processing of the applicant's personal data for offers of other/additional job positions with the controller is permissible based on the consent of the data subject.

In the event that there is any change to the data provided (whether in the form of a CV or otherwise provided), please notify the administrator of this change at the specified contact address or contact e-mail.

Information on the processing of personal data of contractual partners:

This information on the processing of personal data of contractual partners does not affect other provisions of these Principles.

The administrator processes the personal data of contractual partners (i) primarily for the purposes of concluding and fulfilling the contract, or (ii) for the purposes of fulfilling a legal obligation (in particular, fulfilling obligations set out in accounting and tax regulations, or personal data protection regulations), or (iii) on the basis of the legitimate interests of the administrator or a third party for the purpose of exercising and enforcing legal claims of the administrator or a third party (recovery of claims and protection of legal claims of the administrator and third parties), or for marketing and advertising purposes. The administrator may also use personal data for the administrator's administrative needs (including creating records and a list of contact persons).

For potential contractual partners, the controller may process data available from public sources (e.g. public registers, websites, etc.) for the purposes of business contact. The controller may use such data for administrative purposes (including creating records and a list of contact persons).

The legal basis for processing personal data is:

performance of a contract (processing for the purpose of concluding a contract) compliance with a legal obligation applicable to the controller

legitimate interests of the controller or a third party,

fulfillment of the legal obligation that applies to the controller (including proof of obtaining consent).

Beneficiary categories:

IT service providers (IT technical support services, provision of server services, provision of programming services, etc.),

providers of external marketing services, providers of legal services, providers of accounting services, providers of economic services, and possibly also providers of tax advisory or audit services,

public authorities,

other recipients (e.g. insurance companies)

Personal data is processed by the controller both automatically and manually. However, most of the processing takes place automatically (via computer systems), in particular in the controller's systems for accounting, invoicing, etc. However, personal data may also be processed by the controller in records, filing cabinets, etc. (including systems for recording/storing paper documents, business card filing cabinets, etc.).

Personal data storage period:

Contact details for the purposes of offering information society services in accordance with the relevant legal regulation will be processed by the administrator until the business partner expresses their disagreement with further sending of commercial communications,

personal data for the purposes of fulfilling the contract will be processed by the administrator for the duration of the contract (contracts will be recorded for archiving purposes for a period of 10 years from their fulfillment/termination/expiration),

personal data to fulfill the legal obligation of the controller will be processed for the period specified in the relevant legal regulations,

personal data for the purposes of the legitimate interest of the administrator or a third party will be processed by the administrator until 1 year from the end of the limitation period, or for the period necessary for the purposes of implementing the protection of legal claims.

In order to update personal data, the administrator can be contacted at the specified contact address or contact e-mail.

Information on the processing of personal data of users of the company's website:

This information on the processing of personal data of website users does not affect other provisions of this Policy.

Users of the administrator's website may be both users who are/will be in a legal relationship with the administrator (e.g. a client of the company) and users who are not/will not be in a legal relationship with the administrator (i.e. a person who only "views" the website and does not ask/order/request anything). The administrator processes the personal data of website users for legitimate (legally permitted) purposes (e.g. for the purposes of keeping accounting records or for the purposes of fulfilling a contract).

The source of personal data is the activity of the data subject on the controller's website.

The legal basis for processing personal data is:

fulfillment of a legal obligation applicable to the administrator (e.g. keeping accounting records/agenda),

performance of a contract (processing for the purpose of concluding a contract); legitimate interest of the controller or a third party.

- The Administrator processes the following personal data relating to the data subject's activity on the Administrator's website: IP address, date and time of access, etc.

Personal data are processed for the period specified in the relevant legal regulations. Categories of recipients:

IT service subcontractors (network administrator/IT technical support services, server service providers, programming service providers, etc.),
external marketing service providers,
public authorities.

e. further information How to exercise rights by the data subject:

As a personal data subject, you can exercise your rights in connection with the processing of personal data against the administrator by contacting the administrator at the contact address Kaštanová 530/125b, 620 00 Brno, or at the administrator's contact e-mail address info@qpag.cz.

Provision of information by the controller:

The controller provides information in writing in paper form. However, if you contact the controller electronically at the controller's contact email address, the controller will provide you with information electronically (in the form of an email message), unless you request the provision of information in paper form. This does not affect your right to data portability.

If we receive a request from you pursuant to Articles 15 to 22 of the GDPR, we will inform you of the measures taken without undue delay, and at the latest within one month of receipt of the request, we will inform you of the measures taken, the refusal or the extension of the deadline. Taking into account the complexity of the request or the number of requests, we may extend the deadline for informing you of the measures taken (and therefore also for taking the relevant measures) by a further two months. We will inform you of such an extension within one month of receipt of the request, together with the reasons for this extension.

Information about the fact that the data subject has exercised his rights with the controller and how his request was processed by the controller is stored by the controller for a reasonable period of time (usually for a period of 3 years), for the purpose of (i) documenting this fact (exercise and processing of the request), (ii) for statistical purposes, or (iii) for the purposes of protecting the rights of the controller.

Further information:

In cases where personal data is processed without your consent, their provision is required because (i) they are necessary for the performance of obligations under the contract, or (ii) their provision is required by law, or (iii) the legitimate interests of the controller or third parties. Failure to provide data for these purposes (any of them) may result in the failure to conclude a contract, or the inability to provide the requested performance, etc.

The sending of electronic commercial communications to customers within the meaning of the offer of information society services (so-called customer exception) according to the relevant legal regulation can be canceled via the link contained in each individual commercial communication.

In cases where personal data is processed based on your consent, the provision of your personal data is not a legal or contractual condition (legal or contractual requirement), and therefore you do not have to provide consent. In such cases, you are not obliged to provide the personal data in question for the given purpose, nor to give consent to their processing. If you do not provide consent, this may be the reason why the company will not be able to apply some procedures.

In the event that the controller uses personal data for a purpose other than that set out in these Principles, it will immediately provide the data subject with information about this other purpose and other information specified in these Principles.

This Privacy Policy was updated on April 2, 2025.