

# PRIVACY POLICY

The company EBM system s.r.o., ID No.: 65139321, located at Nádražní 1100, 738 01 Frýdek-Místek, registered in the Commercial Register kept by the Regional Court in Ostrava in Section C, File 14501 (hereinafter referred to as the „**EBM system**“), operator of the website [www.TipCars.com](http://www.TipCars.com), [www.TipCar.cz](http://www.TipCar.cz), [www.EBMservice.com](http://www.EBMservice.com), <http://znalci.tipcars.com> , hereinafter referred to as the („**Websites**“) and publisher of printed magazine TipCars speciál, declares, that all personal data processed by EBM system are considered to be strictly confidential and are handled in accordance with the applicable privacy laws. The security of your personal data is a priority for EBM system.

EBM system is in the sense of Act No. 101/2000 Coll. on the Protection of Personal Data, as amended (hereinafter referred to as the "**Act**") and the General Data Protection Regulation (Regulation (EU) 2016/679) (hereinafter referred to as the "**Regulation**"), the controller of your personal data, i.e., collects, stores, uses (and otherwise processes) your personal data for the performance of its business activities – the specific purposes for which personal data are processed are further defined in points 1 and 2. In accordance with the Regulation, the EBM System has appointed a Data Protection Officer, which also ensures that all processing of personal data by the EBM system is in compliance with the law. Data Protection Officer could be contacted on e-mail address: [gdpr@ebmsystem.com](mailto:gdpr@ebmsystem.com) or at the office of EBM system headquarters .

This Privacy Policy applies to any personal data collected by the EBM system on the basis of performance of a contractual relationship, legal obligation, legitimate interest or consent, through Websites or other sources, and describes EBM system's use and protection of personal data.

## 1. PROCESSED PERSONAL DATA

Company EBM system is authorized to process the following personal data according to the purpose for which it obtained from the data subjects:

| Data subjects details: | Processing purposes:   | Where we process data for example:  |
|------------------------|--|---|
| <b>Name, Surname</b>   | Performance of a contractual relationship, (e.g. Service Agreement - TipCars, Order for TipCars Speciál, contact details for ads on Websites etc.), Managing user accounts for services (e.g. registration on website TipCars – My TipCars), Increasing the security of the provided services, Improving the quality of services provided and developing new ones, Sending business messages and offering products and services from the EBM system portfolio, Accounting and tax purposes, Fulfillment of other legal obligations | <a href="http://www.TipCars.com">www.TipCars.com</a> ,<br><a href="http://www.TipCar.cz">www.TipCar.cz</a> ,<br><a href="http://www.EBMservice.com">www.EBMservice.com</a><br><a href="http://znalci.tipcars.com">http://znalci.tipcars.com</a><br>magazine TipCars Speciál<br>internal database of<br>advertisers and subscribers,<br>and others |
| <b>Address</b>         | Performance of a contractual relationship, Increasing the security of the provided services, Accounting and tax purposes, Fulfillment of other legal obligations   | <a href="http://www.TipCars.com">www.TipCars.com</a><br><a href="http://www.TipCar.cz">www.TipCar.cz</a><br><a href="http://www.EBMservice.com">www.EBMservice.com</a><br>magazine TipCars Speciál<br>internal database of<br>advertisers and subscribers,<br>and others  |
| <b>Cookies</b>         | Increasing the security of the provided services,<br>Displaying only ads based on the interests of a visitor to the Websites, Performing analyzes and measurements   | <a href="http://www.TipCars.com">www.TipCars.com</a><br><a href="http://www.TipCar.cz">www.TipCar.cz</a><br><a href="http://www.EBMservice.com">www.EBMservice.com</a><br><a href="http://znalci.tipcars.com">http://znalci.tipcars.com</a>   |

|                            |   |  |
|----------------------------|---|--|
| <b>Bank account number</b> | Performance of a contractual relationship, Accounting and tax purposes  | internal accounting system,<br>internal database of<br>advertisers   |
| <b>IP address</b>          | Increasing the security of the provided services,<br>Performing analyzes and measurements, Fulfillment of other legal obligations   | <a href="http://www.TipCars.com">www.TipCars.com</a><br><a href="http://www.TipCar.cz">www.TipCar.cz</a><br><a href="http://www.EBMservice.com">www.EBMservice.com</a><br><a href="http://znalci.tipcars.com">http://znalci.tipcars.com</a>  |
| <b>Time and date</b>       | Performance of a contractual relationship, Managing user accounts for services,<br>Fulfillment of other legal obligations, ensuring health and property protection  | <a href="http://www.TipCars.com">www.TipCars.com</a><br><a href="http://www.TipCar.cz">www.TipCar.cz</a><br><a href="http://www.EBMservice.com">www.EBMservice.com</a><br><a href="http://znalci.tipcars.com">http://znalci.tipcars.com</a>  |
| <b>ID, VAT ID</b>          | Performance of a contractual relationship, Accounting and tax purposes, Fulfillment of other legal obligations  | <a href="http://www.TipCars.com">www.TipCars.com</a><br><a href="http://www.TipCar.cz">www.TipCar.cz</a><br><a href="http://www.EBMservice.com">www.EBMservice.com</a><br>internal database of<br>advertisers<br>internal accounting system  |
| <b>E-mail</b>              | Performance of a contractual relationship, Managing user accounts for services,<br>Increasing the security of the provided services,<br>Improving the quality of services provided and developing new ones,<br>Sending business messages and offering products and services from the EBM system portfolio, Accounting and tax purposes,<br>Fulfillment of other legal obligations | <a href="http://www.TipCars.com">www.TipCars.com</a><br><a href="http://www.TipCar.cz">www.TipCar.cz</a><br><a href="http://www.EBMservice.com">www.EBMservice.com</a><br><a href="http://znalci.tipcars.com">http://znalci.tipcars.com</a><br>data on advertising in<br>TipCars Special magazine<br>internal database of<br>advertisers<br>internal accounting system |
| <b>Fax</b>                 | Performance of a contractual relationship   | <a href="http://www.TipCars.com">www.TipCars.com</a><br><a href="http://www.TipCar.cz">www.TipCar.cz</a><br><a href="http://www.ebmservice.com">www.ebmservice.com</a><br>internal database of<br>advertisers  |

|                         |  |   |
|-------------------------|--|---|
| <b>Telephone number</b> | Performance of a contractual relationship, Managing user accounts for services, Improving the quality of services provided and developing new ones, Fulfillment of other legal obligations | <a href="http://www.TipCars.com">www.TipCars.com</a><br><a href="http://www.TipCar.cz">www.TipCar.cz</a><br><a href="http://www.EBMservice.com">www.EBMservice.com</a><br>data on advertising in TipCars Special magazine |
| <b>Age</b>              | Improving the quality of services provided and developing new ones   | <a href="http://www.TipCars.com">www.TipCars.com</a><br><a href="http://www.TipCar.cz">www.TipCar.cz</a><br>when inserting a review of a used car   |
| <b>Nick</b>             | Managing user accounts for services, Increasing the security of the provided services, Improving the quality of services provided and developing new ones                                  | <a href="http://www.TipCars.com">www.TipCars.com</a><br><a href="http://www.TipCar.cz">www.TipCar.cz</a><br>Nick is required for registration on <a href="http://www.TipCars.com">www.TipCars.com</a>                     |
| <b>Video recording</b>  | ensuring health and property protection  |   |

Personal data is processed by EBM system both manually and automatated. Company EBM system is authorized to collect, store and use certain information through automated means such as statistical information, whenever you visit Websites.

## 2. PURPOSES OF PERSONAL DATA PROCESSING

Your personal data could be be processed by EBM system fot these purposes

- Performance of a contractual relationship
- Managing user accounts for services
- Increasing the security of the provided services (EBM system increases the security of its services in online sign-in, user identification)
- **Improving the quality of services and developing the new ones** EBM system improves the quality of its services (websites, online services for users and advertisers – e.g. statistics of ads displaying). The development of new services and the improvement of existing ones is done by identifying the needs and wishes of users through e-mails, questionnaires, web analytics, personal meetings with clients.

- **Displaying only ads based on the interests of a visitor to the Websites**
- **Performing analyzes and measurements** (EBM system detects traffic, readability, number of viewed sites, used device, time spent on Websites. These data we collect by using anonymized data in order to be able to offer quality content that is relevant to users and to develop services that our users are clearly interested in.)
- **Sending business messages and offering products and services from the EBM system portfolio** (EBM system send business messages via e-mail or through personal meeting with our Sales Representatives)
- **Marketing purposes of parent company Vltava Labe Media a.s. on the base of the data subject's consent**
- **Accounting and tax purposes** (register in the sense of accounting and tax legislative)
- **Ensuring health and property protection** (EBM system ensures health and property protection through camera systems at the company's headquarters)
- **Fullfilment of other legal obligations** (other legal obligations include e.g. providing information to law enforcement agencies and other public authorities)

### **3. LIST OF PROCESSORS**

Under the EBM system, personal data of data subjects are made available only to authorized EBM system employees or to processors' employees, and only to the extent necessary for processing purposes.

The EBM system is authorized to provide personal data to third parties, if it is necessary for the purpose of processing your requests. These are the following categories of recipients:

- Providers of analytics tools
- Business partners which participates in the organization our marketing events. (e.g. Rallysprint)

- Under certain conditions, we are authorized to give some of your personal information under applicable law, such as law enforcement agencies and other public authorities.

#### **4. USING COOKIES**

Cookies are small content files and used to store and receive identifiers and other information about the computers, phones and other devices you access to sites and help EBM system to provide, protect and improve its services. Cookies allow the website to record information about the user's visit, and by using them, the next user's visit to the website will be easier and faster. Cookies files are used by the EBM system if you visit its website, most often to customize the content, to make anonymous traffic statistics, to select relevant ads, to make it easier to login to the website and more - detailed description can be found below.

**What types of cookies do the websites use?** On the website, the EBM system can use two types of cookies:

- **session cookies** These cookies are temporary. They save your browser's cookie to the file only until you quit your browser. These cookies are required for the proper functionality of the Website or associated applications.

- **permanent cookies (or tracking cookies)** These cookies can be used to make users easier and more user-friendly orientation on the websites, such as simpler and faster navigation. These cookies remain in your browser's cookie file for a longer period of time. The length of that period depends on the selected browser settings. Permanent cookies allow the movement of information to the internet server every time you visit the website.

#### **Login and security**

Cookies help you to register and log on to EBM system sites. If the users are using them, they can remember their login data, the environment (such as a browser) and the functions, so they do not have to enter them each time or they ensure the security after login.

#### **Ads**

With cookies the EBM system can edit and correctly target its ads according to the user's behavior. Advertising systems used on the EBM system use cookies for remarketing, as well as segmentation, also referred to as behavioral targeting, using their own cookies to see how many people saw an ad, clicked on it, or

how many of them saw it repeatedly. Information collected by advertising systems does not contain any personal information, such as name, email address or telephone number. Data is only recognized by cookies that contain a string of characters and numbers from which can be seen that the same user is being returned to the site by the same computer from different browsers. Cookies do not keep their entire history of internet movement, but only their assign to categories that are suitable for segmentaion. Data resulting from user behavior can be used on its sites by Google and Seznam. If you do not want to store these cookies, you can block their using on this address <http://www.youonlinechoices.com/cz/vase-volby>.

## **Traffic**

EBM system is interested in which sites users are viewing and visiting repeatedly, and therefore EBM collects traffic statistics which help them to develop and improve the web site according to users preferences. The EBM system uses traffic measurement by using Google Analytics and Netmonitor on sites. These measurements record for the EBM system which pages the user has visited on the web page, where the user came from, where the user went, which device, operating system or browser the user uses for browsing, or what the preferred language is. These statistics are completely anonymous, so the EBM system does not know which particular user has visited the site. EBM system does not link the obtained data with any other data and manages cookies in such a way that they do not allow the identification of concrete people.

## **Online payments**

On its internet site the company EBM system uses a payment gateway from ČSOB to provide online payments but has no access to information about user accounts and about credit cards that the users enter into the payment gateway. With payment services, the EBM shares information only to the extent necessary to process payments made on our website. At payments, the EBM system also analyzes the effort of different sales channels through cookies. Cookies can be rejected by the user or set only using of some in their browser settings. However, if you do not allow the use of cookies to the EBM system, some features and pages will not work as they should. Setting up privacy on a computer where using of cookies can be refused or disabled can be found by the user in the menu of internet browser. You can find cookies settings in the most commonly used browsers on the following websites:

- Chrome - <https://support.google.com/accounts/answer/61416?hl=cs>
- Firefox - <https://support.mozilla.org/cs/kb/vymazani-cookies>

- Internet Explorer - <https://support.microsoft.com/cs-cz/products/security>

## **5. TIME OF STORAGE**

We process and store your personal data for as long as is necessary to ensure all rights and obligations arising out of the contract, ie at least for the duration of your order execution, and for the period for which the EBM system is required to keep as an administrator under generally binding legal regulations or for which you have given us the permission. In other cases, the processing time results from the processing purpose or it is given by the legislation in the field of personal data protection. We process the personal data according to the purpose of their processing after the stated period:

- Execution of a contractual relationship - to an appeal
- Administration of user accounts for the services - until the account is canceled
- Improving the quality of provided services and developing of the new ones - max. 2 years
- Displaying only ads based on the interests of a website visitor - max. 1 year
- Analyzing and measurements - max. 1 year
- Sending business messages and offering products and services from the EBM system portfolio - to an appeal
- Accounting and tax purposes 10 years from the following calendar year after the performance
- Ensuring health and property protection - max. 1 month
- Other legal obligations - max. 5 years

## **6. RIGHTS OF DATA SUBJECTS**

As a data subject, you have the rights listed below, which you may derive from the law, and you can apply at any time. As a data subject, you have the rights listed below, which you may derive from the law, and you can apply at any time. These are the right to (i) access to personal data, (ii) to correct inaccurate or



false personal data, and (iii) to request clarification if there is a suspicion that the processing of personal data is detrimental to the protection of personal and private life or personal data are processed contrary to law (iv) to contact the Data Protection Office, (v) deletion of personal data if personal data are no longer required for the purposes for which they were collected or otherwise processed or if they were unlawfully processed, (vi) to limit the processing of personal data. At the latest with effect from 25 May 2018, you may also make a claim (vii) the right to data portability and (viii) the right to raise an objection after which processing of your personal data will be terminated if it is not proven that there are serious legitimate reasons prevailing over the interests or rights and freedoms of the data subject, in particular, if there is the reason for relevant enforcement of legal claims.

• **Right to access personal data** To know if EBM system processes your personal data, you have the right to obtain from EBM information about whether your personal data is being processed and, if so, you also have the right to access your personal data. In the event of a repeated request, the EBM system will be entitled to charge a reasonable fee for a copy of the personal data provided.

- **Right to correct inaccurate and false personal data** If you feel that the EBM system is processing inaccurate or false personal data of you, you have the right to ask for correction. The EBM system will correct them without delay, but always with regard to technical options.
- **Right to request an explanation** In case you suspect that the EBM system by processing your personal data interferes with the protection of your personal and private life or that your personal data is processed contrary to the law, you may request an explanation from the EBM system.
- **Right to contact the Data Protection Office** If you believe that your privacy is being violated, you may contact the Data Protection Office ([www.uoou.cz](http://www.uoou.cz)).
- **Right of deletion** If your personal data is no longer needed for the purposes for which it was collected or otherwise processed, or if it is found to have been processed unlawfully, you have the right to request their deletion.
- **Right to restrict the processing of personal data** In case you are not interested in deleting but only temporarily restricting the processing of your personal data, you may request the EBM system a limitation on the processing of your personal data.
- **Right to data portability** If you want the EBM system to pass on your personal data to a third party, you can use your right to data portability. If the exercise of this right could adversely affect the rights and freedoms of

third parties, the EBM system will not be able to comply with your request.

- **Right to raise objection** You have the right at any time to raise the objection to the processing of personal data processed for the purposes of carrying out the task done in a public interest or public authority or to protect the legitimate interests of the EBM system. V případě, že EBM system neprokáže, že existuje závažný oprávněný důvod pro zpracování, který převažuje nad Vašimi zájmy nebo právy a svobodami, EBM system zpracování na základě Vaší námitky ukončí bez zbytečného odkladu. In the case that the EBM system does not show that there is a serious legitimate reason for processing that outweighs your interests or rights and freedoms, EBM system will terminate the processing on grounds of your objection without delay.

At implementation of your rights, please contact us at the address of the EBM system. EBM system reserves the right to verify the identity of the applicant for the objective rights in an appropriate manner.

**The policy of processing personal data are effective from  
1. 5. 2018.**