

PERSONAL DATA PROTECTION

Information from the controller of the on-line communication platform at 'speak.commontongue.com' with regard to personal data protection.

I. Introductory provisions

1. This information by the business entity 1st Cloud Republic a.s., registered office: Písecká 2558/11a, 130 00 Praha 3 – Vinohrady, Company No. (IČ): 01855735, incorporated in the Companies Register of the Municipal Court in Prague, Section B, File 19221 (hereinafter the "Controller") is intended for data subjects whose personal data the Company processes in connection with the conduct of its business – i.e., by operating a SAAS service via the on-line 'speak.commontongue.com' communication platform.
2. The protection of the personal data processed by the Controller is governed by the 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), as well as by generally applicable legal regulations of the Czech Republic governing personal data protection and/or enacted in the Czech Republic for the purposes of adaptation of the GDPR Regulation.
3. The Controller processes data subjects' personal data in accordance with the GDPR Regulation and shall not disclose such personal data to any third party without the data subject's prior approval except where authorised or required to do so by a legal regulation.
4. The Controller processes all personal data at a level of security adequate to the nature of the specific data, and the data is accessible only to the Controller.
5. In its activity, the Controller assumes that all personal data for any data subject was provided to the Controller in accordance with legal regulations and is true, complete and current.
6. In relation to data subjects' personal data processed by a business entity in connection with the conduct of the Company's business, the Controller acts in the capacity as a personal data controller.

II. Identity and contact information of the Controller for personal data protection

Business entity: 1st Cloud Republic a.s.

Registered office: Písecká 2558/11a, 130 00 Praha 3 – Vinohrady

Company No. (IČ): 01855735; e-mail: info@commontongue.com

III. Categories of personal data processed

1. The Company in its capacity as the Controller processes the following categories of personal data:

Standard user accounts:

- Nick name (alias)
- E-mail address

Share owners' user accounts:

- First name and surname
- Address
- Passport/ID card number
- Date of birth
- E-mail address

2. The Controller processes data subjects' personal data exclusively in connection with the conduct of its business (i.e., for the purpose of operating a SAAS service and a user account in an online application).

IV. Purpose and legal basis of personal data processing

1. The Controller processes personal data exclusively for the purpose of:
 - Managing user accounts.
 - Basic functionalities of user accounts (notifications).
2. The Controller considers the following to be the legal basis for personal data processing:
 - Personal data subject's consent pursuant to Article 6(1)(a) of GDPR Regulation.
 - Performance of a contract pursuant to Article 6(1)(b) of GDPR Regulation.
 - Compliance with a legal obligation to which the Controller is subject pursuant to Article 6(1)(c) of GDPR Regulation.
 - Company's legitimate interest pursuant to Article 6(1)(f) of GDPR Regulation.

V. Period of personal data processing and the criteria used for determining the period

1. The Controller processes all personal data only for a period necessary to fulfil the purpose of personal data processing. The period during which the Company processes various items of personal data is defined for the individual categories of personal data by separate laws and the Company duly observes such periods.
2. The Company processes personal data for the period of:
 - Managing user accounts.
 - Three years after the last activity as part of the user account.

VI. Rights of the data subject

1. Data subjects have the following rights, the exercise of which they may seek with the Company in its capacity as the personal data controller:
 - Right of access by the data subject to personal data concerning him or her pursuant to Article 15 of GDPR Regulation.
 - Right to obtain from the Company confirmation as to whether or not personal data concerning him or her are being processed.
 - Right to lodge a complaint with a supervisory authority, i.e., the Office for Personal Data Protection.
 - Right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her, and to have incomplete personal data completed pursuant to Article 16 of GDPR Regulation.
 - Right to obtain from the controller the erasure of personal data concerning him or her where one of the following grounds applies:
 - The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
 - The data subject withdraws consent and there is no other legal ground for the processing.
 - The data subject objects to the processing and there are no overriding legitimate grounds for the processing.
 - The personal data have been unlawfully processed.
 - The personal data have to be erased for compliance with a legal obligation.

- The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of GDPR Regulation.
 - Right to restriction of processing.
 - Right to data portability.
2. The Controller has a notification obligation regarding the rectification or erasure of personal data or the restriction of processing.

VII. Data subject's right to withdraw consent to personal data processing

1. The Company hereby advises data subjects that each data subject has the right to withdraw his or her consent to personal data processing in accordance with Article 7(3) of GDPR Regulation. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

VIII. Personal data recipients

1. The Company hereby advises data subjects that personal data may be disclosed to any of the following personal data recipients:
 - Employees of the Company and persons working for the Company under contracts on work done outside employment.
 - Public authorities in the course of observance of the Company's statutory obligations.
 - Person providing legal services to the Company.
 - Person keeping the Company's accounts and providing tax advisory.
2. The Company does not transfer data subjects' personal data to third countries.

IX. Security of processing

1. The Company hereby advises data subjects that, in connection with its processing personal data, the Company finds the following potential risks:
 - Accidental or unlawful destruction.
 - Loss.
 - Alteration.
 - Unauthorised disclosure.
2. The Controller implements all appropriate technical and organisational measures in order to ensure a level of security of processing personal information adequate to the risks specified above, in particular:
 - Ensuring the ongoing confidentiality, integrity, availability and resilience of processing systems and services.
 - Ensuring the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident.
 - Ensuring processes for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

X. Exercise of the rights of the data subject

1. The rights of data subjects may be exercised vis-à-vis the Company and any requests in connection with the data subjects' personal data may be made in writing at the Company's registered office or electronically using the following e-mail address: info@commontongue.com.