

PRINCIPLES OF PERSONAL DATA PROCESSING of

TAWAN s.r.o.

The administrator of personal data is TAWAN sro, with its registered office in Prague 7, Bubenská 575/23, postal code 17000, ID number: 274 46 395, entered in the Commercial Register kept by the Municipal Court in Prague, section C, insert 113571, represented by Jiřina Forejtková, Executive Officer. .

For better clarity and orientation, the following are terms that are frequently repeated in this Policy.

E-SHOP - internet application available on the internet, developed for the purpose of displaying, selecting and ordering services by the customer, www.tawantime.cz;

INFORMATION SYSTEM - an internal information system that is used to record various activities within the administrator's business, including records containing personal data

PERSONAL DATA - any information about the subject, on the basis of which it can be directly or indirectly identified

REGISTERED USER - a data subject who used the possibility to set up and use a user account available on the Administrator's website

ADMINISTRATOR - determines the goals and means of processing. It is us, mostly in the position of the seller of our goods or services.

DATA SUBJECT - a natural person to whom Personal Data relates, most often a customer or a potential customer

USER ACCOUNT - an account established under the conditions set out in the terms and conditions, which is protected by a password selected by the User, including for the purpose of participating in the Tawan Club

WEB - Website Administrator www.tawan.com

PROCESSOR - performs processing activities on the basis of a contract or other authorization for the Administrator

PERSONAL DATA PROCESSING - is any operation or set of operations with personal data or sets of personal data that is performed with or without automated procedures such as collecting, recording, organizing, structuring, storing, adapting or modifying, retrieving, viewing, using, access by transmission, dissemination or any other access, alignment or combination, restriction of deletion or destruction;

I. CATEGORIES OF PERSONAL DATA

The Administrator processes personal data of registered Users as well as its unregistered customers. Specifies the goals and means of processing.

Categories of personal data: name, surname, e-mail, mobile phone, billing data, bank connection, login to the user account, behavior in the user account, IP address, cookies, health data

Personal data provided voluntarily. Users voluntarily provide personal data to the Administrator, as soon as the User registers, purchases in the Administrator's E-shop or in any other way (eg by e-mail, telephone) or in any other similar way.

Special categories of personal data (Sensitive personal data). In the event that the customer expressly wishes, the Administrator may assign to the User Account and information about the customer voluntarily communicated information about the health condition so that the Service can be provided regularly with regard to this information. Without the express consent of the data subjects, the controller does not process data on the health restrictions of its customers.

Publicly available personal information. The controller may process personal data from publicly available sources and combine them with those that have been voluntarily provided to the controller by data subjects.

Website. The controller processes information on when data subjects visit and browses its website. This information may include the IP address, web activity and other information about interacting with our website. We may collect this data as part of a log or through cookies or other tracking technologies.

Social networks. The administrator has a profile on Facebook and Instagram. Any information, communication or material provided through the social media platform is provided at your own risk. The administrator cannot control all users of social networks or even providers of these networks. The protection of personal data is addressed separately within each of the mentioned platforms.

The data subject can be simultaneously logged in to Facebook, Google Account, Twitter, Youtube when using the Administrator's website. The administrator thus allows the data subject to share his / her website experience with the data subject's friends on his / her social networking profile. You can also link to the administrator's website by sending it via e-mail.

II. PURPOSES OF PROCESSING

All the above categories of personal data are processed by the Administrator, as they are necessary for the fulfillment of the following purposes:

A. User Account Registration and Tawan Club

The e-shop, which is operated by the administrator, allows registration to the Tawan Club by setting up a user account. During registration, personal data is required in order to create a user account, which is used to list orders that the data subject makes or has already made, retrieving discounts in the form of bonus credits for further purchases, or managing invoicing and delivery data.

The legal reason for processing personal data for the purposes of registration for a user account is the granting of voluntary, unconditional consent of the personal data subject to the administrator.

Members of the Tawan Club are sent a regular newsletter from which members can unsubscribe at any time.

B. Performance of the contract

The legal reason for the processing of personal data is the performance of a contract to which the data subject is a party or the implementation of measures taken before the conclusion of a contract for the provision of services.

The processing of personal data is carried out for the purpose of the smooth delivery of goods or services ordered by the data subject.

C. Newsletter

Sending promotional e-mails to registered users and / or customers to promote similar products and services. The Administrator may send commercial messages to the contacts of its Users or customers, where, based on a legitimate interest, it promotes similar products and services through direct marketing, but only until the recipient disagrees.

Apart from the case of legitimate interest, the Administrator may also send commercial communications to those who have given prior consent to the processing of personal data for marketing and business purposes in advance (eg via the contact form on the Administrator's website). The "Logout" function is set in every marketing communication that the administrator disseminates, ie even if he communicates with his Users. The administrator sends commercial messages regarding the offer of his services or related products, usually twice a month.

D. Subscription to business communications

The e-shop administrator allows you to subscribe to business messages.

The legal reason for processing personal data for the purpose of sending commercial communications is the granting of voluntary, unconditional consent of the personal data subject to the controller, in the form of a confirmation on the relevant page with the subscription. Each customer is duly informed through these policies about their rights as a party to personal data protection.

Subscription to business communications takes place in the so-called double opt-in mode, which prevents possible misuse of the e-mail address. In practice, this means that after confirmation, a confirmation of the request to receive commercial communications is sent to the entered e-mail. This confirmation contains an active link, and only by clicking on it will the e-mail be included in the database of recipients of commercial message subscribers.

The administrator uses the Ecomail.cz service to send all business messages

E. Sending transaction messages.

These are messages for registered Users, to ensure information on the necessary maintenance or error states of the E-shop, as well as on new functionalities. At the same time, this includes e-mails about the status of the order, delivery of the order or the stage of the complaint procedure, etc. These can be transactional e-mails or messages via the Information System, or other similar messages.

F. COOKIES

The administrator's website uses cookies. The administrator informs about their settings and use on a separate subpage of the website.

Cookies are small files that temporarily store information in your browser and are commonly used to distinguish user behavior on the web. However, the person of the user is not identifiable on the basis of this information. Cookies help, for example:

- in order for the website to function properly in order to complete the purchase process with the least possible difficulty, the processing of these cookies cannot be refused;
- when remembering the login details for the account on the website, so that it is not necessary to enter them every time, these cookies can be rejected;
- Finding out which pages and features visitors use most often. based on this to best adapt our offer, these cookies can be rejected;

- help to find out which ads visitors view most often, so that they do not always see the same advertisement when browsing the site, or so that they do not show advertising on goods they are not interested in, these cookies can be rejected;

Some marketing cookies may collect information which is subsequently used by third parties and which, for example, directly supports our advertising activities (so-called "third party cookies"). For example, information about the products you view may be used to show a visitor to a website outside of the webmaster's site only the advertisement that is relevant to that particular user, without the user being bothered by an advertisement that does not interest them. However, you cannot be identified by this information.

The administrator's website uses the following third-party cookies:

AdWords (Google Inc), Sklik (Seznam.cz, a. S.), Facebook (Facebook Inc), Ecomail (Ecomail.cz s. R. O.): For tracking, remarketing

Google Analytics (Google Inc): For web analytics

You can use your web browser to reject cookies or set the use of only certain cookies. You can also change the cookie settings on the administrator's website.

G. Links to External Sites

For optimal information of visitors, the Administrator's website contains links to third-party websites (usually business partners with whom the Administrator cooperates). If the data subject clicks on this link, they acknowledge that third party sites have their own data protection policies, which may differ from the administrator's website policies.

H. Submitting the contact form

The Administrator's website allows you to contact the Administrator via the contact form.

In addition to the question, the name, telephone and e-mail must be entered in the form. By pressing the Send form button, the data subject agrees to the processing of personal data for the purpose of contacting and answering the entered question.

The time for processing personal data in the case of sending a contact form, for which the personal data will be stored by the administrator, is the duration of the query, then the personal data are deleted from the administrator's database.

I. Other marketing activities on the administrator's website

On the administrator's website, you can meet with other marketing activities such as: filling out a questionnaire, quiz, participation in a competition, etc. These are extraordinary, time-limited activities, for which it is always stated separately what personal data the administrator collects and how they are further handled.

The personal data that are necessary for the proper provision of the service, respectively. in order to fulfill all obligations of the controller, whether these obligations arise from the contract or from generally binding legal regulations, the controller is obliged to process regardless of the consent granted by the data subject for the period specified by applicable law, or in accordance with them data.

J. Compliance with legal requirements, including participation in court proceedings and legal requirements of public authorities, including compliance with national security or law.

III. SCHEDULED PROCESSING TIME

For the purposes of registration and maintenance of the User Account, as well as membership in the Tawan Club, all categories of personal data may be processed for a **period of 2 years** from the last active view of the User Account, unless the data subject requests the cancellation of the account earlier.

For the purposes of fulfilling the rights and obligations arising from the contractual relationship between the controller and the customer for the duration of the contractual relationship between the controller and the data subject, or for the time necessary to fulfill legal obligations and protect their legitimate interests, but no later than 5 years from termination contractual relationship with the data subject.

The time for processing personal data in the case of sending commercial messages is **2 years from the last active inspection of the commercial message by the customer**, if the data subject does not unsubscribe from the collection earlier.

Exceptions are tax documents issued by the Administrator in accordance with Section 35 of Act No. 235/2004 Coll., Tax documents are kept for a period of 10 years from the end of the tax period in which the performance took place.

IV. TECHNICAL, SECURITY AND ORGANIZATIONAL MEASURES

Technical and safety measures. With regard to the probability of risks and the ratio between the price of possible measures as well as technical possibilities, the administrator has

introduced technical security and organizational measures - in all areas where personal data is processed (especially web operation, e-shop operation, employee agenda, communication with customers). The administrator meets the strict requirements of the GDPR parties.

The Administrators' developers work with attorneys to ensure that the Administrator's operation of the Administrator's E-shop and website and the provision of services by the Administrator comply with applicable spam and privacy laws.

The administrator cannot disclose all details and circumstances of a technical nature by which it protects its website and e-shop and the personal data it processes. Disclosure of details could make it easier for those who might want to break systems and security barriers.

The Administrator states that it uses a secure Information System, which provides Personal Data with security corresponding to the state of the art, costs, nature, scope and purposes of processing. The Administrator considers the Information System to be safe also with regard to possible risks to the rights and freedoms of natural persons.

Organizational measures. All employees who have access to Personal Data are bound by confidentiality and must respect security principles. Access to all systems, including the Information System, is personalized and covered by passwords that are created in various ways. The information system registers logs so that the Administrator can control the access of individual employees to individual databases. Employees are regularly trained.

Office. The Administrator's offices are secure, lockable, and strangers cannot access them without the Administrator's knowledge. Records kept in paper form are not kept by the Administrator, only where absolutely necessary. In this case, the Administrator keeps them under lock and key.

V. TRANSMISSION OF PERSONAL DATA TO THIRD PARTIES

The Administrator transfers personal data only to entities with which he has a proper processing contract or a contract of joint administrators.

Joint administrators. These are the operators of individual establishments in which the Administrator actually provides relaxation and massage services. These entities have daily access to the Information Reservation System, which is designed primarily to manage reservations and orders. Business communications, as well as other marketing activities where personal data of customers are processed are performed exclusively by the administrator. The joint administrators have agreed that the administrator acts as a contact person, via e-mail info@tawan.cz or at the registered office address.

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TAWAN Karlovy Vary s.r.o., IČ: 263 65 138, with its registered office at Bubenská 575/23, Holešovice, 170 00 Prague 7, represented by Jiřina Forejtková, Executive Officer

TAWAN Brno s.r.o., IČ: 019 18 354, with its registered office at Bubenská 575/23, Holešovice, 170 00 Prague 7, represented by Jiřina Forejtková, Executive Officer

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Processors. The Administrator uses only verified processors with whom it has a written contract and who provide the Administrator with at least the same guarantees as the Administrator to data subjects. The controller only uses processors who are from the EU or from countries safe according to the decision of the European Commission. All these partners are bound by the obligation of confidentiality and may not use the provided data for any purposes other than those for which they were made available to them by the administrator.

Our processors are an accounting firm, payment gateways, lawyers, developers or marketing specialists, as well as software and cloud solutions. We use the service and our data can be stored on the servers of Google LLC., Ecomail.cz. We use the services of couriers and carriers of goods, as well as the services of Sklik.cz, Heureka.cz, accounting and payroll system. We provide details about our processors on request.

Legal obligations. The Administrator may transfer personal data to third parties if required by law or in response to legal requirements of public authorities or at the request of a court in litigation.

VI. RIGHTS OF DATA SUBJECTS

The controller may request access to personal data and request the correction, modification, deletion or restriction of the processing of personal data where they are inaccurate or have been processed in violation of applicable data protection laws. The data subject has the right to the portability of personal data, to object to the processing of personal data, the right to withdraw consent to the processing of personal data and the right not to be subject to automated individual decision-making, including profiling (which the Administrator does not do).

The rights of data subjects can be exercised by e-mail info@tawan.cz.

The controller shall endeavor to be able to comply with the rights of the data subjects without delay. However, there may be circumstances in which the Administrator cannot provide access (for example, if the requested information endangers the privacy of others or other legitimate rights, or where the cost of providing access would be disproportionate to the risks to individual privacy). The Administrator shall take reasonable steps to verify the identity of the User before taking any action by the parties to the rights of the data subjects.

Details of the rights of data subjects:

1. Right of access to personal data

Pursuant to Article 15 of the GDPR, you will have the right to access personal data, which includes the right to obtain from the Administrator:

- confirmation of whether he processes personal data,
- information on the purposes of the processing, the categories of personal data concerned, the recipients to whom the personal data have been or will be disclosed, the planned processing time, the existence of a right to request or object to the controller's correction or deletion of personal data concerning the data subject; , the right to complain to the Authority, of all available information on the source of personal data, if not obtained from the data subject, of the fact that automated decision - making, including profiling, takes place, of appropriate safeguards for data transfers outside the EU,
- provided that the rights and freedoms of others and a copy of personal data are not adversely affected.

In the event of a repeated request, the Administrator will be entitled to charge a reasonable fee for the copy of personal data.

2. The right to correct inaccurate data

According to Article 16 of the GDPR, the data subject has the right to correct inaccurate personal data. The data subject is also obliged to notify changes to his personal data. At the same time, he is obliged to provide co-operation if it is found that the personal data processed by the Administrator about him are not accurate. The repair will be performed by the Administrator without undue delay, but always with regard to the given technical possibilities.

3. Right of deletion

According to Article 17 of the GDPR, the data subject will have the right to delete personal data concerning him, unless the controller proves legitimate reasons for the processing of such personal data. The administrator has set up mechanisms to ensure automatic anonymization or deletion of personal data if they are no longer needed for the purpose for which they were processed.

4. The right to restrict processing

According to Article 18 of the GDPR, the data subject has the right to limit the processing until the complaint is resolved, if he denies the accuracy of personal data, the reasons for their processing or if he objects to their processing.

5. The right to be notified of a correction, deletion or restriction of processing

According to Article 19 of the GDPR, the data subject has the right to be notified in case of correction, deletion or restriction of the processing of personal data. If personal data is corrected or deleted, the Administrator will inform the individual recipients, except in cases where this proves impossible or requires a disproportionate effort.

6. The right to the portability of personal data

Under Article 20 of the GDPR, the data subject has the right to the portability of the data concerning him provided to the controller in a structured, commonly used and machine-readable format, and the right to request the transfer of such data to another controller.

If you provide personal data in connection with the Administrator's Service Agreement or on the basis of consent and their processing is performed automatically, you have the right to obtain such data from the Administrator in a structured, commonly used and machine-readable format. If technically feasible, the data may also be transferred to the administrator designated by you, provided that the person acting on behalf of the relevant administrator is duly designated and can be authorized.

In the event that the exercise of this right could adversely affect the rights and freedoms of third parties, your request cannot be granted.

7. The right to object to the processing of personal data

According to Article 21 of the GDPR, the data subject has the right to object to the processing of his personal data on grounds of legitimate interest.

If the Controller does not prove that there is a serious legitimate reason for the processing that outweighs the interests or rights and freedoms of the data subject, he / she shall terminate the processing on the basis of the objection without undue delay.

If the objection is filed in the case of processing related to direct marketing, then the Administrator will terminate the processing without undue delay.

8. The right to withdraw consent to the processing of personal data

Consent to the processing of personal data for marketing and business purposes can be revoked at any time after this date. An appeal must be made an explicit, comprehensible and definite expression of will.

Processing of data from cookies can be prevented by setting a web browser.

9. Automated individual decision-making, including profiling

The data subject has the right not to be the subject of any decision based solely on automated processing, including profiling, which would have legal effects or be significantly affected by it in a similar way. The controller states that it does not perform automated decision-making without the influence of human judgment with legal effects for data subjects.

VII. CONCLUSION

The goods and services of the Administrator are not primarily intended for persons under the age of 16. The administrator does not knowingly collect personal data from persons under the age of 16.

These policies can only be changed in writing. Users will be notified via the Administrator's website.

If you have any questions from the parties to our Privacy Policy, please feel free to contact us via info@tawan.cz.