

PRIVACY POLICY

Through this Privacy Policy (the "Principles"), we inform the data subjects whose personal data we process about all processing activities and data subjects privacy policies.

Responsible persons

Privacy Manager:

Rekola Bikesharing s.r.o., IČ: 048 93 875, with registered office at Tusarova 877/56, Holešovice, 170 00 Praha 7

Contact for exercising rights in connection with the protection of personal data: info@rekola.cz

(hereinafter also referred to as "Company", "We", "Our" or "Us")

Basic concepts

1. GDPR:

1. Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC effective from 25.5.2018.

2. Personal data:

1. Personal data within the meaning of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (hereinafter referred to as "GDPR") shall mean any information identifiable or identifiable for a natural person (ie about the data subject = you).

3. Special personal information:

1. Special personal data means an indication of racial or ethnic origin, political opinions, religion or philosophical beliefs or trade union membership, and the processing of genetic data, biometric data for the sole purpose of identifying a natural person and health or sexual life or sexual orientation Individuals.

4. Subject of data = You:

1. The data subject is an identified or identifiable natural person, an identifiable natural person being a natural person that can be identified directly or indirectly, in particular by reference to a particular identifier such as name, identification number, location data, network identifier or one or more specific physical elements , physiological, genetic, psychological, economic, cultural or social identity of that individual.

5. Processing of personal data:

1. The processing of personal data, within the meaning of Article 4 (2) of the GDPR, means any operation or set of operations with personal data or personal data files that is executed with or without the help of automated procedures such as collecting, recording, arranging, structuring, storing, or alteration, retrieval, inspection, use, disclosure by transmission, dissemination or any other disclosure, sorting or combining, restriction, deletion or destruction.

6. Administrator:

1. We are the administrator of your personal information. For the purposes of Article 4 (7) of the GDPR, a controller is a natural or legal person, a public authority, an agency or other entity which, alone or jointly with others, determines the purposes and means of processing personal data; where the purposes and means of such processing are determined by the law of the Union or of a Member State, that right may determine the particular controller or specific criteria for his designation.
7. Processor:
 1. Processor within the meaning of Article 4 (8) of the GDPR is a natural or legal person, public authority, agency or other entity processing personal data for the controller; that is to say, some business partners of the Company who, at the direction and according to the Company's requirements, process personal data.
8. Risk processing:
 1. Risk processing means processing that is likely to pose a risk to the rights and freedoms of data subjects, processing is not occasional or involves the processing of specific categories of data or personal data relating to criminal convictions and offenses referred to in Article 10 of the GDPR.
9. Automated individual decision making incl. profiling
 1. is generally understood to mean any form of decision based on the automated processing of personal data, ie without human intervention, including, but not limited to, the assessment of some personal aspects relating to the data subject, in particular for analysis or estimation, analyzing or anticipating aspects relating to his / her work performance, economic situation, health, personal preferences, interests, reliability, behavior, where he / she is or moving.

Processed personal data

We process your identification data (name, surname), contact details (address, e-mail, phone), location data (GPS), data contained in the CVs for job seekers, accounting data of our suppliers (bank account number) order and delivery history, claim data. We process these data in accordance with legal regulations, in particular with GDPR, as amended.

Categories of data subjects

We process personal data of people divided into the following categories

1. Our customers (Rekola users and those with whom we have concluded a framework agreement on the rental of means of transport - bicycles)
2. Jobseekers
3. Our suppliers of goods and services
4. News subscribers
5. Purpose of processing of personal data

We process personal data for a clearly defined purpose:

Categories of data subjects	Purpose of processing personal data	Legal basis and processed personal data	processing time
Our customers	Execution and implementation of contracts with customers (services, handling of complaints, making payments for renting bicycles, etc.).	The legal basis for the execution of the contract. We collect personally identifiable information (name, surname and date of birth), contact information (telephone number, email address and the address of permanent residence), information about the history of orders, information about the position of the bicycle upon receipt and return the registration date and details of the verification phone numbers.	For this purpose, personal data may be processed for the duration of the contract.
	Assertion of claims from contractual relations after the termination of the contract (in particular the handling of complaints or enforcement of debts and other obligations from signed contracts)	The legal basis is our legitimate interest. We collect contact information (phone, e-mail), order history - trips and location data within the range: instead of picking a site submission bicycle.	For this purpose, personal data may be processed for a period of four years from the termination of the contractual relationship and if the legal proceedings or other proceedings, then throughout these proceedings.
	Tracking user bicycle upon receipt bicycle while driving and when submitting the wheels in order to improve the quality of our services, prevention of theft or damage to bicycles Tracking bicycle upon receipt, during driving and when submitting the wheels to prevent theft and damage of bicycles	The legal basis is your approval. In Rekola you have the option to enable location tracking via GPS, in which case we collect information about your location through your mobile device where you installed the application. Location tracking is disabled after installation. The legal basis is our legitimate interest. Some of our bikes are equipped with a GPS chip or a GSM module, which allows constant tracking bicycle's location information but in this case is not connected with the customer The aim of this procedure is not monitoring customer, but the current position and route wheels to protect against theft and damage, as well as for statistical purposes and determining the suitability of the location of racks for bicycles.	For this purpose, personal data may be processed for granting your consent. For this purpose, the data may be processed for one week / month.

	<p>Dissemination of commercial communications in the form of email newsletters containing offers, information and news</p> <p>Fulfilling our obligations in the field of accounting and taxation</p>	<p>The legal basis is our legitimate interest. To process identification and contact customer personal data occurs to disseminate commercial messages in accordance with law no. 480/2004 Coll.</p> <p>The legal basis for the fulfillment of legal obligations that we impose laws such as the Law on Accounting and the Law on Value Added Tax.</p>	<p>For this purpose, personal data may be processed for an indefinite period until the moment when the recipient logs from the collection.</p> <p>For this purpose, personal data may be processed only after a period of 5 years from the end of the tax year in which the transaction took place.</p>
Our suppliers of goods and services	<p>Execution and performance of contracts concluded with suppliers, external partners and creditors, debt collection</p> <p>Assertion of claims from contractual relations after the termination of the contract</p>	<p>The legal basis for the execution of the contract. Processing of identification and accounting of personal data of other Contracting Parties is necessary for the fulfillment of their contractual obligations.</p> <p>The legal basis is our legitimate interest. Identification and collection of accounting data, among others. On payments made, is essential for dealing with complaints, debt and other contractual obligations of contracts concluded between us and these data subjects.</p>	<p>For this purpose, personal data may be processed for the duration of the contract.</p> <p>For this purpose, personal data may be processed for a period of four years from the termination of the contractual relationship, if adversarial process throughout the proceedings.</p>
Job seekers	<p>Assessing the suitability of candidates for employment in the tender and re-addressing in the event of termination of employment with another successful tenderer during the probationary period</p> <p>Any proof of compliance with non-discrimination and equal treatment obligations under the Employment Act during the selection process for staff</p>	<p>The legal basis for the implementation of measures adopted before concluding the contract at the request of the data subject. We collect personally identifiable contact, qualification and other personal data acquired in the tender (especially by candidates CV or during the interview).</p> <p>The legal basis is our legitimate interest. We collect personally identifiable information (name, nice, date of birth, information on personal status and photo when in biography), contact personal information (phone, e-mail) for a possible demonstration of compliance of the tender procedure for an employee with the provisions of the Act employment of non-discrimination and equal treatment obligations.</p>	<p>Personal data are processed for this purpose for a period of three months from the cancellation of the tender or the onset of another selected candidates for the advertised position.</p> <p>For this purpose, personal data may be processed for a period of four years from the end of the tender, in the case of pending litigation or other proceedings throughout the proceedings.</p>

news subscribers	Regular sending commercial communications and related e-mail	The legal basis of the agreement that you gave us when registering for our newsletter. Identification data (name and surname), contact information (e-mail).	For this purpose, personal data may be processed to withdrawal of consent.
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Time of processing of personal data

Personal data are kept only for the time necessary for the purpose of processing - see table above. After this time, personal data may be retained for the purposes of the State Statistical Service only, for scientific and archival purposes.

Recipients of personal data and transfer of personal data outside the European Union

In justified cases, we may also transfer your personal information to other entities (the "recipients").

Personal data may be transmitted to the following recipients:

processors who process your personal data according to our instructions and whose relationships are treated according to the requirements of Article 28 GDPR:

1. Access to your personal data may be provided by the providers of our programs, only to the extent necessary and for the purpose of administering and technically supporting such programs.
2. public authorities and other entities, if required by applicable law;
3. other entities in case of an unexpected event in which the provision of data is necessary for the purpose of protecting life, health, property or other public interest or if it is necessary to protect our rights, property or security (eg the Police of the Czech Republic).

Cookies

After your first visit to our website, our server sends a small amount of data to your computer and saves it there. Each time the site visits the site, the browser sends the data back to the server. This small file is called "cookie," and it's a short text file containing a specific string of characters with unique information about your browser. We use cookies to improve the quality of our services and to better understand how people use our site. That's why we have user preferences saved in cookies, and we follow user trends, how people behave on our site and how they view them.

Most browsers are set to accept cookies. However, you have the option to set your browser to block cookies or to inform you of cookies. Without cookies, however, some services or features will not work properly.

Our websites use only first-party cookies, that is, cookies used only by our web sites (hereinafter referred to as first-party cookies) and "third-party" cookies (ie cookies from third-party websites). First-party cookies are used to store user preferences and data needed during your visit to websites (such as the content of your shopping cart). Third-party cookies are used to track user trends and behavioral patterns, ad targeting, with the help of third-party Web site providers. Third-party cookies used to track trends and behavior patterns are only used by our web site and web stats provider, they are not shared with any third party.

We mainly use the following third-party cookies:

Google Analytics

Google AdWords

Facebook Pixel

Smartlook

Privacy Policy

Legality

We process your personal information in accordance with applicable law, especially with GDPR.

Data subject consent

We process personal data only in the manner and to the extent that you have given us consent if the consent is the title of processing.

Minimization and limitation of processing of personal data

We process personal data only to the extent it is necessary to achieve the purpose of its processing and for no longer than is necessary to achieve the purpose of its processing.

Accuracy of processed personal data

We process personal data with emphasis on their accuracy. Using reasonable resources we process personal data updated.

Transparency

Through these Principles and Contacts listed above, you have the opportunity to learn how we process your personal information, as well as its scope and content.

Purpose restriction

We process personal data only to the extent necessary for the fulfillment of the intended purpose and in accordance with that purpose.

Safety

We process personal data in a manner that ensures its proper security, including its protection by appropriate technical or organizational measures against unauthorized or unlawful processing and against accidental loss, destruction or damage.

Automated individual decision making and profiling

When processing your personal data, there is no automated, individualized decision-making, even through profiling.

Your rights as a data subject

Right of access to personal data

You have the right to request from us access to personal information about your person. In particular, you have the right to receive from us a confirmation that personal data concerning you are processed or processed by us and provide further information on the processed data and the processing method in accordance with the relevant GDPR provisions. If you ask for it, we will provide you with a copy of the personal data we process about you free of charge. In case of a repeated request, we may charge a reasonable fee for providing a copy corresponding to the administrative costs of processing.

To access your personal data, please use the contact listed in this Policy.

The right to withdraw consent to the processing of personal data if processing takes place on the basis of consent
You have the right at any time to withdraw consent to the processing of personal data processed by us through this consent, in particular through the contact specified in this Policy.

Right to the repair of personal data

If you find that personal information about you is inaccurate, you may require us to correct this information without undue delay. If this is appropriate in the light of the specific circumstances of the case, you may also request the addition of the data we process. You may request correction, limitation, or deletion of data through the contact listed in this Policy.

Right to deletion of personal data

You have the right to request us to erase without undue delay the personal data processed by us that concern you in the following cases:

1. if you revoke your consent to the processing of personal data, and there is no other legitimate reason for our processing to prevail over our right of cancellation;
2. if you object to the processing of personal data (see below);
3. Your personal data is no longer needed for purposes for which we have collected or otherwise processed them;
4. personal data has been unlawfully processed by us;
5. personal data was gathered in connection with the provision of information society services to a person below the age of 18;
6. personal data must be deleted to comply with a legal obligation laid down in European Union law or the Czech law applicable to us.

The obligation to delete your personal information in these cases is without your request. Under the terms of Article 17 of GDPR, we do not need to delete your personal information (for example, if we need data to claim our legal claims against you).

You may request a deletion in these cases through the contact listed in this Policy.

The right to limit the processing of personal data

You have the right to restrict the processing of your personal data in the following cases:

1. you deny the accuracy of your personal information. In this case, the limitation is valid for the time required to verify the accuracy of personal data.
2. processing is illegal and you do not want to delete your personal information and instead you want to limit their use.
3. We no longer need your personal data for the purposes for which we processed it, but you are required to identify, exercise or defend legal claims;
4. you object to the processing (see below). In this case, the limitation applies for a period until it is verified that the legitimate reasons on our part outweigh your legitimate reasons.

At a time when we limit the processing of personal data, we may only process your personal data (with the exception of its storage) only with your consent or for the purpose of determining, enforcing or defending our legal rights, for the protection of the rights of another natural or legal person or for reasons of major public interest or a Member State. As noted above, you can request processing restrictions through the contact listed in this Policy.

Right to object to processing

You have the right to object to the processing of your personal data in the following cases:

1. If your personal data is processed on the ground that processing is necessary for the purposes of our legitimate interests and you object to the processing of the objection, we can not process the personal data unless we substantiate serious legitimate reasons for processing that outweigh your interests, rights and freedoms, or for the determination, exercise or defense of our legal claims.
2. If your personal data is processed for direct marketing purposes and you object to the processing, we will no longer process personal data for that purpose.
3. If your personal data is processed for purposes of scientific or historical research or for statistical purposes, we will not process it further unless the processing is necessary to fulfill a task carried out for reasons of public interest.

You can submit a complaint through the contact listed in this Policy.

Right to data portability

In the case that we process your personal data with your consent or because it is necessary to fulfill a contract between us, you have the right to obtain from us the personal data you are referring to and you have provided us in a structured, commonly used and machine-readable format, if personal data are processed by us. You have the right to pass this data to another data controller or to require us to provide this information directly to another data controller if this is technically feasible.

Please contact the contact listed in this Policy to obtain your personal information.

The right not to be subject to any decision based exclusively on automated processing, including profiling

You have the right not to be the subject of any decision based solely on automated processing, including profiling, which has legal effects for you or is of significant consequence to you.

This does not apply if:

- automated decision making allows legal regulation;
- automated decision making is necessary to conclude or perform a contract between us;
- your explicit consent to automated decision-making has been granted.

The right to obtain information about a breach of security of your personal data

If it is likely that a breach of our security will be a high risk for your rights and freedoms, we will notify you of this violation without undue delay. If appropriate technical or organizational measures have been used to process your personal data, such as making the unauthorized person incomprehensible, or by additional measures to ensure that the high risk does not occur, we do not need to transmit the infringement information.

Right to file a complaint with the Supervisory Authority

If you believe that the processing of your personal data is in violation of the obligations set forth in the GDPR, you have the right to file a complaint with the Supervisory Authority.

This Privacy Policy is effective from August 28, 2018