

## **Principles Relating to Processing of Personal Data for Alive Verify Application**

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### **2. Introductory Provisions**

- 2.1. These Principles Relating to Processing of Personal Data for Alive Verify Application (the “**Principles**”) are intended for all users of the Alive Verify application (the “**Application**”).
- 1.1. The Application is operated by and the data controller is GTS ALIVE Group s.r.o., identification number (IČO): 09296727, with its registered office at Na Maninách 1092/20, Holešovice, 170 00 Prague 7, registered in the Commercial Register maintained by the Municipal Court in Prague under file no. C 334013 (“**GTS Alive Group**”).
- 2.2. The use of the Application shall be governed by the [Alive Verify Application Terms of Use](#) (the “**Terms of Use**”).
- 2.3. In giving his or her consent to the Terms of Use, the User takes note of the contents of these Principles and declares that he or she understands everything and that he or she has been properly informed about the processing. In case of a legal entity that is represented by several individuals, the User undertakes to inform all other Users about the wording of these Principles.
- 2.4. The purpose of these Principles is to provide complete information about the processing of User’s personal data in connection with the use of the Application, including the fulfillment of any information requirements within the meaning of Articles 13 and 14 of the General Data Protection Regulation (the “**GDPR**”).
- 2.5. If the User has any questions prior to accepting these Principles, he or she shall contact GTS Alive Group using the below contact details.

### **3. Data Controller, Data Protection Officer, and Contact Details**

- 3.1. GTS Alive Group shall act as data controller; GTS Alive Group has also appointed a data protection officer.
- 3.2. Contact details of GTS Alive Group are as follows:
  - 3.2.1. Written communications: GTS ALIVE Group s.r.o., Na Maninách 1092/20, Holešovice, 170 00 Prague 7, Czech Republic
  - 3.2.2. Email communications: [legal@gtsalive.com](mailto:legal@gtsalive.com)
- 3.3. Karel Beck shall act as a data protection officer, contact details: [legal@gtsalive.com](mailto:legal@gtsalive.com)

### **4. Application**

- 4.1. Purpose: GTS Alive Group provides services to the User in the form of the Application to be downloaded on a User’s device. Application functionalities and compatible devices are specified in the [Terms of Use](#).
- 4.2. Legal basis for the processing: performance of a contract; GTS Alive Group cannot provide the relevant services to the User without such processing.
- 4.3. Categories of personal data concerned: data relating to a User’s device, settings, language, country, network identifiers, IP address, logs, User Account login information, and any and all data relating to the use of the Application.
- 4.4. Recipients: only contractual data processors in the following categories: providers of technical solutions, IT services, auditors, legal services, accounting services.
- 4.5. Transfers to third countries: NO

- 4.6. Period for which the personal data are stored: throughout the existence of the Application in a User's device. Following the termination or deletion of the Application (whether by the User or GTS Alive Group), data shall only be retained for the purpose of the below specified [legitimate interests](#) and/or [for complying with a legal obligation](#).

## **5. Legitimate Interest**

- 5.1. Purpose: In the event GTS Alive Group carries out the above processing, then, following the termination thereof, it collects limited documents and personal data in order to protect its own rights, defend any claims made, and for its defense during court/administrative/control or other proceedings.
- 5.2. Legal basis for the processing: legitimate interest of GTS Alive Group with a view to protect its rights, document compliance and defend itself in respect of supervisory authorities. **You may object to this legitimate interest at any time.**
- 5.3. Categories of personal data concerned: evidence of legal acts, such as granted consents, relevant logs, submitted requests to exercise rights, data on proper provision of services, and material data relating to the Application and services.
- 5.4. Recipients: only contractual data processors in the following categories: providers of technical solutions, IT services, auditors, legal services, accounting services.
- 5.5. Period for which the personal data are stored: GTS Alive Group shall retain such collected data for a period of 3 years from the expiry of the processing period set down by another purpose under these Principles. The period shall not end before any initiated court or other proceedings and associated deadlines for any appeals.

## **6. Compliance with Legal Obligations**

- 6.1. Purpose: If GTS Alive Group is required to retain certain documents under the applicable legislation, it does so for the purpose specified by such legislation. One example is the retention of documents relating to tax and accounting agenda.
- 6.2. Legal basis for the processing: compliance with a legal obligation.
- 6.3. Categories of personal data concerned: only such data or documents that are to be retained under the applicable legislation.
- 6.4. Recipients: only contractual data processors in the following categories: providers of technical solutions, IT services, auditors, legal services, accounting services.
- 6.5. Period for which the personal data are stored: GTS Alive Group shall only retain such collected data for a period defined by the applicable legislation.

## **7. User's Rights and Exercising Such Rights**

- 7.1. To ensure an adequate level of the security of data processing and protection of personal data, GTS Alive Group has implemented appropriate technical and organizational measures that are in line with the current level of development of technical means, which facilitate the security of data processing, particularly the prevention of unauthorized access to or unauthorized use or theft of personal data.
- 7.2. Any processing of personal data shall respect User's rights guaranteed by this article.
- 7.3. Right of access to personal data – your right to obtain from GTS Alive Group, without undue delay, information about which personal data are being processed, purpose of processing, recipients, retention period, and information about associated rights.
- 7.4. Right to rectification – right to obtain from GTS Alive Group, without undue delay, the rectification of inaccurate personal data or completion of any incomplete data.

- 7.5. Right to erasure (“right to be forgotten”) - right to obtain from GTS Alive Group, without undue delay, the erasure of your personal data;
- 7.6. Right to restriction of processing of your personal data – right of the User to obtain from GTS Alive Group restriction of processing, provided the requirements of Article 18 of the GDPR are met (e.g. accuracy of personal data is contested, the User has objected to processing, etc.).
- 7.7. Right to data portability - right to receive the personal data concerning you, which you have provided to GTS Alive Group and which are processed by automated means on the basis of your consent or a contract, in a structured, commonly used and machine-readable format, and the right to transmit such data to another controller or to have the personal data transmitted directly to another controller, where technically feasible.
- 7.8. Right to object to processing of personal data that concern you. GTS Alive Group shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defense of legal claims. Where personal data are processed for direct marketing purposes, you shall have the right to object at any time to processing of personal data concerning you for such marketing, which also includes profiling. If you object to such processing, your personal data will no longer be processed for such purposes.
- 7.9. Right to lodge a complaint to a supervisory authority, i.e. the Office for Protection of Personal Data (Úřad pro ochranu osobních údajů), with its registered office at Pplk. Sochora 727/27, 170 00 Prague 7 - Holešovice, [www.uoou.cz](http://www.uoou.cz).
- 7.10. You have the right not to be subject to any decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. GTS Alive Group does not base any of its decisions solely on automated processing.
- 7.11. You can request partial or complete erasure or blocking of your personal data at any time and free of charge; you can also request information about personal data concerning you that we store and apply for the rectification of such data. It is not necessary to use a specific form for this purpose; you can simply contact us using the above contact details.
- 7.12. We will handle all your requests without undue delay, but in any case no later than 30 days in duly justified cases.
- 7.13. If you wish to exercise your right, in your capacity of data subject, with regard to GTS Alive Group, in its capacity of controller, or if you wish to submit any requests, inquiries or complaints relating to the processing of personal data, use our [contact details](#).

## **8. Final Provisions**

- 8.1. The processing of personal data of Users shall be governed by the laws of the Czech Republic.
- 8.2. These Principles are effective as of 1 May 2023.
- 8.3. GTS Alive Group may amend these Principles as and when necessary. Any such changes shall be effective on the date of notification or on a later date specified in the notification thereof. Changes shall be notified electronically. The User may reject any such changes and terminate the use of the services in accordance with the Terms of Use as well as the processing of personal data under these Principles, as of the effective date of such changes.