

PRIVACY POLICY

Dear users,

please read this document carefully. This document contains all the necessary information regarding your personal data that is processed in the dobrey Service, which enables the interconnection of the offer and the demand in the area of meals (hereinafter referred to as the "**Service**") run by dobrey.com s.r.o., ID: 066 38 058, registered address: Kamýcká 1281, Suchdol, 165 00 Prague 6 (hereinafter referred to as the "**Operator**"), including the binding terms and conditions for the exercise of your rights.

If you have any inquiries related to privacy protection and the exercise of your rights, please contact us at e-mail svatek@dobrey.com.

1. For what purpose do we process your personal data?

The Service is based on enabling the interconnection of the offers of people preparing meals (Cooks) and people demanding the prepared meals (Diners).

For this activity, it is necessary to know who is offering the prepared meals and who is demanding the prepared meals. We also have to know who our Users are, so that the interconnection of the offer and demand could occur (hereinafter referred to as "**Users**"). For this reason, all Users have a User's Account, where they must enter their identification and contact information. The Users have the possibility to also enter other information voluntarily. However, it is not possible to provide the Service without entering the data which are necessary to run the Service.

Therefore, we process the personal data so that you could use the Service.

We do not perform any profiling or automated decision-making but other Users may enter your reviews.

In legitimate cases, we also process your personal data for the purpose of protecting our interests, typically in cases of legal disputes, court proceedings, audits performed by public authorities, etc. Here, we have to prove that we were acting in compliance with the legal regulations when providing our Services.

In order to find out how the Service is used and in order to ensure its consequent improvement, we also monitor the behavior of the Users of the Service using so called logging and tracking (therefore, sign-in history and use of the individual functions of the dobrey application).

We process the e-mail address you gave us when providing the Service for the purpose of **sending information and newsletters about our similar services or products**. If you do not want to receive this information, you can unsubscribe at any time for free. The method will always be stated in such an e-mail.

2. What personal data do we process?

We process your identification data, contact data, the information necessary for fulfilling legal obligations and information about fulfilling mutual contracts, the information necessary for using the Service and its functionality (information about the prepared meals, location information, etc.), information, which is required by the legal regulations.

3. Who do we receive the personal data from and who do we hand the personal data over to?

We primarily receive the personal data from you. You are obliged to provide us only accurate data and if your personal data changes, you are obliged to update the data.

We receive the data that arise as a result of your activity within the scope of the Service automatically.

Your personal data are not handed over outside of the EU, unless otherwise stated.

We use a Processor to process your personal data – a provider of hosting, development and innovation services of the dobrey Application, which is **Pixelmate, s.r.o.**, ID: 028 76 523, registered address: Pod Lázní 720/13, Nusle, 140 00 Prague 4. Furthermore, we use the service of **G Suite** provided by **Google LLC**, registered address: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. In this case, your data may be handed over to the USA based on the terms and conditions of a so called Privacy Shield (<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI>) and the service of **Mailgun** operated by **Mailgun Technologies, Inc.**, registered address: 535 Mission St. San Francisco, CA 94105, USA. In this case, your data may also be handed over to the USA based on the terms and conditions of a so called Privacy Shield (<https://www.privacyshield.gov/participant?id=a2zt0000000PCbmAAG&status=Active>) and **Amazon Web Services EMEA SARL**, 5 rue Plaetis, L-2338 Luxembourg, Luxembourg.

The personal data may be handed over to public authorities for the purpose of performing their legal obligations.

Within the scope of the Service, the personal data are accessible to other Users in the range of data stated in your Profile/offer, which you published or may be published, based on your decision. Your review of other Users is also accessible to other Users.

4. How do we process the personal data?

The User's personal data are processed electronically by automated means, specifically by means of the dobrey application.

We also process your personal data manually in compliance with the relevant purpose, where manual processing is necessary or suitable. Our employees or other people working for us may access your personal data during its administration, also for the purposes of removing errors, inaccuracies, etc. However, these people may only process the personal data under the terms and conditions and range stated above and they are bound by the obligation of confidentiality about personal data and about security measures, given that if this information is publicized, it would put the security of personal data at risk.

We always process the personal data in compliance with the relevant legal regulations and ensure its utmost care and protection. We ensure that your rights are not infringed within the scope of processing, especially the right to maintain human dignity. Within the scope of our Service, we also protect you against unauthorized interference into your privacy and your personal life.

5. How long do we process your personal data?

a) Service

We process the personal data for the period for which you use the Service. Once you cancel your Account or once the Service Provision Agreement is terminated for another reason, the data that are not necessary to process for other purposes will be cancelled and deleted within one month, at the latest. It will no longer be possible to renew this data.

We keep the data that we must process for reasons other than running the Service, namely:

b) Legitimate interests

It is also necessary to process the personal data regarding the fulfillment of mutual agreements for our legitimate interests, ie. so that we could defend ourselves before the court in case of any User's claims (for example, during the course of the relevant limitation period, which may be up to 15 years from the occurrence of the relevant case in the Czech Republic).

In relation to the above, we process identification data (name, surname, address, date of birth) and contact data (e-mail), information about fulfilling agreements (their content, information about their fulfillment and information about using the *dobrey* application). Unless it is justified by the commencement of a specific proceeding, we process personal data for a period of 5 years from the termination of the use of the Service.

c) Sending business newsletters

As stated above, we send business newsletters until you unsubscribe. The possibility to unsubscribe is stated in every such e-mail and is free.

d) Copyrights

If you have provided us with the content of protected **copyrights** (or similar rights), we have to keep information regarding who the author is and what license you have provided us for the duration of the relevant property copyrights (in the Czech Republic, this is 70 years after the death of the last author of such a copyright).

Personal data is not processed based on a consent. Therefore, it is not possible to withdraw the consent with processing. However, based on a written request, we shall always assess whether or not it is still necessary to process the data.

6. What are your rights?

Firstly, you have the right to ask us for access to your personal data, including the provision of a copy of all the carriers of your personal data and a list of the personal data processed.

We will always inform you about the following:

- a) the purposes of processing your personal data,
- b) personal data, including categories of personal data, which are subject to processing, including all available information about their sources,
- c) the character of automated processing, including profiling and information concerning the process used as well as the significance and expected consequences of such processing for the data subjects,

- d) recipients or categories of recipients,
- e) planned periods during which the personal data should be saved; if this cannot be determined, then the criteria used to determine this period,
- f) all available information about the sources of personal data, if the personal data are not received from you.

Your other rights include:

- a) the right to ask us for an explanation,
- b) the right to request the removal of the existing state, especially regarding blocking, making corrections, additions, restrictions of processing or the liquidation of personal data (the right to be forgotten),
- c) the right to request the personal data concerning you in a structured, commonly used and machine readable format, and hand over this data to another Controller without any hindrance on our side,
- d) the right to submit an inquiry or complaint to the Office for Personal Data Protection,
- e) the right to object to the processing of personal data concerning you.

7. How do we protect your personal data?

The following security means serve to secure your data:

All interaction and communication with the application from the client's side is handled through an SSL certificate. Sensitive information, such as passwords, is encrypted by a special function that makes it impossible to access the password in a readable format. The application is protected against unauthorised access to data on the application server or database.

8. When do we process your personal data as the processor?

As a Cook, you may create groups within the scope of the Service, these groups include you as the Cook and the Diners, who have signed up for your specific offer of prepared meal. For the purpose of mutual communication within the group, you may use the application function that enables the sending of messages between group members.

When creating groups, within which you as the Cook is then authorized to address Your Diners (clients), you as the Cook are in the position of the controller of your Diners personal data. We are then in the position of the Processor of personal data of the Diners towards the Cook (controller).

In such a case, we process the Diners' personal data for the purpose of enabling the use of the function consisting in creating groups. In addition to the data stated in Article 2 of this document, the subject matter of processing of the Diners' personal data will be the data about the assignment to the specific group, communication. For this purpose, we process the personal data of the Diners for the period for which the specific group exists. In order to process this personal data, we use, as sub-processors, **Pixelmate, s.r.o.**, ID: 028 76 523, registered address: Pod Lázní 720/13, Nusle, 140 00 Prague 4. Furthermore, we use the service of **G Suite** provided by **Google LLC**, registered address: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. This may deal with handing over to the USA based on the terms and conditions of a so called Privacy Shield (<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI>) and **Amazon Web Services EMEA SARL**, 5 rue Plaetis, L-2338 Luxembourg, Luxembourg.

With regard to Article 28(3) of 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 No. 95/46/EC (General Data Protection Regulation) (hereinafter referred to as "**GDPR**"), we undertake to:

- a) process your personal data based on the Cooks' submitted instructions only, including matters of handing over personal data to third countries or international organizations;
- b) ensure that people, who are authorized to process your personal data are bound to confidentiality or ensure that the legal obligation of confidentiality applies to them;
- c) accept all technical and organizational measures pursuant to Article 32 of GDPR, in order to ensure a level of security corresponding to the given risks, especially the following means of security: All interaction and communication with the application from the client's side is handled through an SSL certificate. Sensitive information, such as passwords, is encrypted by a special function that makes it impossible to access the password in a readable format. The application is protected against unauthorised access to data on the application server or database;
- d) follow the conditions for including other processors pursuant to Article 28(2) of GDPR (for example, the consent of the Cooks);
- e) take into consideration the character of the processing, assist Cooks via suitable technical and organizational measures, if possible, in order to fulfill the obligations of the Cooks, react to the request about executing the rights of data subjects pursuant to Article 28 of GDPR and Articles 12 - Article 22 of GDPR as well as fulfill other obligations in the sense of GDPR (especially based on Articles 32 - 36 of GDPR).
- f) assist Cooks in ensuring compliance with the obligations to secure personal data, report security incidents, etc.
- g) in compliance with the decision of the Cooks, delete all personal data or return them to the Cook after the termination of the provision of the service related to processing and delete all existing copies, unless otherwise defined by the law. Unless we obtain other instructions from the Cooks, we will delete all data that we process as the Processor immediately after the termination of the existence of the specific group;
- h) provide the Cooks with all necessary information to ensure that the obligations defined in this Article are fulfilled, we will allow audits, including inspections performed by Cooks or other auditors that are authorized by the Cooks and we will contribute to these audits;
- i) immediately report all discovered breach of security of personal data in such a manner so that the Cook may proceed pursuant to Article 33(1) of GDPR.