# A. Introductory provisions

Easy Selling LTD, 52 Grosvenor Gardens Nwms Office 514, Belgravia, London, SW1W 0AU, England ("**Operator**") operates an online marketing campaign system ("**System**") at https://easy-selling.org/.

As part of the use of the System services, persons entrust the Operator with various information, including their personal data.

Persons acknowledge that by registering and creating a user account, they confirm that they have read, understand and fully accept the Personal Data Processing Policy, including the information regarding the use of cookies.

# 1. Identity of the Administrator and processor

1.1 The data Administrator of the personal data is Easy Selling LTD, whose registered office is 52 Grosvenor Gardens Nwms Office 514, Belgravia, London, SW1W 0AU, England, ID: 13871049 (**the "Administrator").** The Administrator is also the processor of the personal data provided and keeps records of the processing activities.

1.2 All requests regarding the provision of information or processing of personal data and the use of Cookies may be directed to the **Data Protection Officer, Julianna Balogh; email: complaints@easy-selling.org**

# 2. Information collected about Scheme members, its legal basis and purpose

2.1 From the moment of registration on the System's website, the following information is collected about individuals:

* Name and surname
* E-mail
* Telephone contact
* Date and time of registration
* Date and time of last activity on the web portal
* Membership in the organisation - name, address and ID number (if applicable)
* Billing information

2.2 Unless otherwise stated, personal data is processed by the Administrator on the basis of a lawful reason and legitimate interest of the Administrator. The legitimate interest derives, inter alia, from the purpose of the individual personal data processed, which is further specified below.

2.3 As a rule, personal data is used only for the purpose for which it was communicated to the Administrator, i.e. to enter into a contractual relationship between the person and the Operator in accordance with the Operator's Terms and Conditions, to carry out any administrative tasks necessary for membership and use of the System services, as well as to link the person and the Operator's consultant, if applicable, including the transmission of the necessary data about these persons to the consultant. Another purpose is, for example, to inform persons about new services provided by the Operator, new features, changes in the provision of services and other news related to the System.

2.4 Personal Data is only disclosed to authorised personnel of the Administrator and the Operator, and only to the extent necessary for the purposes of processing it and fulfilling the meaning and purpose of the System.

2.5 The Administrator shall comply with all obligations necessary to eliminate the possibility of unauthorised or accidental access to, alteration, destruction or loss of, unauthorised transfer of, or other unauthorised processing of, Personal Data, as well as other misuse of Personal Data.

2.6 By submitting an order from the online order form or by filling in the Operator's enquiry form, the person confirms that he/she is aware of the Terms and Conditions of the personal data protection and that he/she accepts them in their entirety.

2.7 The Operator is entitled to change the Terms and Conditions set out in this document. They will publish the new version of the Terms and Conditions and privacy policy, including the use of cookies, on their website and will also send a notification of the new version of these Terms and Conditions to the person concerned at the email address provided to the Administrator.

# 3. Data used for registration and login

3.1 The data required for registration include e-mail, telephone contact.

3.2 The email and password are used as access data to log a person (subscriber) into the web interface of the System within his/her user account.

3.3 Email and telephone contact are also used for any communication between the System administrators and the person.

3.4 Prior registration and login are necessary steps for a person to become a member of the System and to access the services provided by the System.

3.5 Without registration, it is not possible to use all the services of the System.

# 4. Data about activity on the portal

4.1 Data about activity on the Web Portal include the date and time of the last login.

4.2 The date and time of registration is stored to show when a person is a registered user and when the legal relationship begins.

# 5 Organisation details

5.1 For the purposes of data processing, an organisation (company) means any legal entity within the meaning of the Act in which a person who has registered with the Scheme is employed by or performs work for it under another contractual relationship.

5.2 The following data is kept about an organisation: name, registered office address and contact address, contact e-mail address and telephone number, identification number, VAT number (if the organisation has one).

5.3 The name, address and identification number of the organisation may be used by the Administrator to further offer of their products.

# 6. Order and payment related data

6.1 If a person chooses to order access to use the System services, the following data is stored about him/her:

* which licence the person has chosen and paid for
* billing information
* telephone contact
* e-mail

6.2 The information about which licence the person has subscribed to and paid for is needed in order to allow access for the period of time for which the licence is valid. The order history is recorded for clarity and so that the person has the invoice in question available for download at any time.

6.3 Billing information is needed by the Administrator in order to invoice for the selected licence type.

6.4 Telephone contact and email is recorded for the purpose of resolving any problems with the order as quickly as possible.

# 7 Email communication to persons

7.1 Email communications to persons fall under three main areas of email: necessary transactional emails, non-transactional emails and newsletters.

7.2 Necessary transactional emails are those emails that contain the necessary information for a person's account to function. Examples of necessary transactional emails are emails with a link to reset a password, emails with a link confirming a valid email during registration, etc. These emails cannot be turned off because without them the person would not be able to use their account or the contract could be breached. If a person does not wish to receive the necessary transactional emails, their account must be cancelled. These emails never contain any commercial communications.

7.3 Non-transactional emails are emails notifying and specifying the ordered content of services, in particular information regarding changes to the System. These emails may include emails announcing changes to Terms and Conditions, etc. In the context of providing the ordered services, it is sometimes necessary to communicate with the subscribers of such services with a simultaneous large number of addressees for whom such a message is intended. This is often not possible to do otherwise than by sending a bulk e-mail, and therefore some bulk messages (for example, the aforementioned notification of a change in Terms and Conditions) also fall within the scope of non-transactional e-mails. These e-mails are generally not commercial communications, but this is not always the case.

7.4 So-called newsletters are regulated below in a separate article 8.

# 8. Newsletters

8.1 A regular e-mail newsletter will be sent to registered users. Newsletters are such emails which are usually sent automatically to persons and contain facts about new information regarding the System and the services offered or other related services from other providers or at other web addresses. These newsletters may include messages asking for System reviews or feedback, etc. These newsletters are generally in the nature of commercial communications.

8.2 The newsletters are usually sent on a weekly basis.

8.3 The regular sending of newsletters can be cancelled by unsubscribing in the footer of each such sent e-mail. A person may also request to unsubscribe by sending a message to the e-mail address complaints@easy-selling.org.

# 9. Disclosure of data to third parties and other persons

9.1 For marketing purposes, the Administrator may provide personal data of individuals to the minimum extent possible to third parties involved in the System or to third parties with a similar focus.

9.2 The third parties to whom personal data is transferred for processing in this way are:

* Google Analytics: https://policies.google.com/privacy?hl=cs&gl=cz,
* Google YouTube; https://www.youtube.com/howyoutubeworks/our-commitments/protecting-user-data/
* Vimeo, Inc., 555 West 18th Street New York, New York 10011,
* Stripe, a payment gateway company, https://stripe.com/en-cz/privacy

9.3 At the same time, upon entering into a contract for the provision of services with the Operator under the Terms and Conditions at the web address of the System operated by the Operator, the Person consents to the recording of his/her participation in the online webinar and its subsequent commercial use for the purposes of the Operator (providing the recording to other users for a fee) and for the promotion of the Project.

# 10. Storage period of personal data

10.1 Personal data will be processed and stored until the registered person's profile (user account) on the System's website is deleted for statistical purposes and data for the purposes of evaluating and improving the services according to Article 9. However, the processing and storage of necessary personal data for marketing and other promotional purposes (e.g. targeted advertising) is valid for the period of time before consent to the processing of personal data for marketing purposes is withdrawn, if the personal data processed on the basis of such consent. However, this provision does not apply to the consent given pursuant to Article 2.6, i.e. the use of the recording of a person's participation in an online webinar for its subsequent commercial use for the purposes of the Operator.

10.2 The maximum period for which data is stored is the duration of the person's user account (i.e. until it is deleted under the previous provision), or three years from the person's last activity. In the event of a legitimate interest in potential litigation, personal data is retained for a maximum of ten years. This applies only to those personal data that need to be processed for that period. Unnecessary personal data shall always be deleted no later than three years after the last activity according to the first sentence.

10.3 Personal data may be retained and processed on the basis of the law for the necessary period of time, if the Administrator is obliged to do so by law or other legal obligation - for example, processing and retention necessary for the protection of the vital interests of the data subject or another natural person; for tax and accounting purposes; if the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Administrator, etc.

10.4 After the expiry of the retention period, the Administrator shall erase the personal data.

# B. What rights does a person have and how to exercise them?

**The right of access to information and the right to protection**

At any time, a person registering on the System's website may request the Administrator to send confirmation of whether or not their personal data is being processed by sending a message to the email address complaints@easy-selling.org. In the event that such data is processed by the Administrator, such person may also ask the Administrator for information about any third parties to whom personal data has been or may be disclosed, in addition to the information provided in the Terms and Conditions and this Privacy Policy. If the Administrator has not obtained such personal data of the person concerned, that person has the right to all available information about where the Administrator obtained his/her personal information.

If the Administrator processes personal data about a person inaccurately, the person may notify the Administrator of this fact by sending a message to the e-mail address complaints@easy-selling.org, whereupon the Administrator will correct the inaccurate personal data without undue delay.

**Right to object to the processing of personal data**

In the event that a person whose personal data is processed and archived by the Administrator in accordance with the aforementioned Personal Data Processing Policy objects to such actions of the Administrator, he/she may contact the Administrator by sending a message to the e-mail address complaints@easy-selling.org. If the person lodges such an objection, the Administrator will not be able to process his/her personal data until he/she proves what compelling and legitimate reason he/she has for the processing and that this reason outweighs the interests of the person concerned.

Should the Administrator process personal data for direct marketing purposes (e.g. for the purpose of sending commercial communications newsletters, etc.), the person concerned may object to the above-mentioned e-mail address. After such objection, the Administrator will no longer process the data for direct marketing purposes.

**Right to restriction of the processing of personal data**

The person has the right to have the Administrator restrict any processing of his or her personal data, including its deletion:

* If the person informs the Administrator that the personal data collected by them is inaccurate, pending verification of its accuracy, or its correction or completion.
* If the processing of such person's personal data is unlawful and the person concerned requests, by sending a message to complaints@easy-selling.org, to restrict its use instead of deleting it.
* If such person objects to the unlawful processing, until the Administrator verifies that its processing purposes override the interests of the person concerned or it is required by law to do so.

**Right to be forgotten (right to erasure of personal data)**

In the event that a person becomes aware that the Administrator is processing his or her personal data:

* although the processing is no longer necessary for the purposes for which the Administrator obtained it
* although the person concerned has withdrawn consent to their processing and there is no further reason for processing them
* although the data subject has raised an objection to unlawful processing and the Administrator has not been able to demonstrate legitimate grounds for processing which override the interests of the data subject
* unlawfully

such data subject shall have the right to have the personal data so processed erased by the Administrator without undue delay after notification of such facts by sending a message to the e-mail address complaints@easy-selling.org. However, the data may not be erased by the Administrator even at the request of the data subject, if their processing is necessary for the exercise of the right to freedom of expression and information, for the fulfilment of a legal obligation of the Administrator or is necessary for the performance of a task carried out in the public interest or for the establishment, exercise or defence of legal claims of the Administrator or other third parties.

**Right to the provision of data in machine-readable form**

If a person sends a message to the e-mail address complaints@easy-selling.org requesting the Administrator to provide him/her with personal data processed by the Administrator, the Administrator shall send it to such person in a structured, commonly used and machine-readable format (e.g. \*.pdf format - or a tabular format). If the person requests that the Administrator send their personal data to another data Administrator, the Administrator is obliged to do so.

**Right to request at any time to stop receiving commercial communications**

In the event that a person no longer wishes to receive commercial communications or newsletters, he or she may notify the Data Administrator at any time, without giving any reasons, either by clicking on the marked link that will be included in each commercial communication or by sending a message to the e-mail address complaints@easy-selling.org.

# C. Rules for the use of cookies

A cookie is a file with a small amount of data that the System's website stores on the user/visitor's device (hereinafter referred to as "**User**") during his/her visit to said website, for the purpose of collecting information to distinguish individual Users accessing the website. The information thus obtained takes the form of technical information about the User's device, system and application software and peripheral devices. Cookies are mainly used to analyse traffic and optimise the functionality of the website and increase its user-friendliness.

The data collection process using Cookies takes the form of storing a person's identifier in the form of a special encrypted key. The information obtained in this way is anonymous, i.e. without personal data that could lead to the identification of the User.

The cookies used by the Operator of the aforementioned website are for statistical and necessary use. Statistical are used to analyze traffic and other statistical data and Necessary Cookies are necessary for the proper functioning of the website.

The Operator's website may also contain third-party Cookies, which are used by the Operator to obtain anonymous statistics about the traffic and typical behaviour of Users of its services. These third parties do not store any personal data in connection with the use of Cookies, as the identity of the User of the Operator's services is not known to them. These third parties include in particular Google.

In this context, the Provider provides the User with information about the use of Cookies when visiting the System's website, the purpose of which is to obtain the User's consent to their use before the Cookie is stored on the User's device. By confirming Cookies in the browser, the User gives general consent to their use. The use of Cookies can be modified (e.g. enabled, disabled, deleted, etc.) in the browser settings or via the pop-up Cookie bar.

This Personal Data Processing Policy and the rules on the use of Cookies take effect on 1 June 2022.