

## PRIVACY POLICY

Software governing rules and principles of the acquisition and subsequent management of personal data of Users of the Portal,

released by individuals - entrepreneurs: Lubos Kvet (ID: 03085554 | Registered office: Klikorkova 189, Kladno, Czech Republic | registered in the Trade register Kladno OZ/4637/14/BE | lubos@analights.com) and Jakub Motycka (ID: 03245951 | registered office: 464 Svinarovska, Smecno, Czech Republic | registered in the Trade register in Slany MUSLANY/35058/2014/ZU | jakub@analights.com).

### I. GENERAL ESTABLISHMENT

1. This Privacy Policy (hereinafter referred to as "PP") constitutes an integral and binding part of the General Terms and Conditions for this Portal.
2. The User expressly states that he is familiar with these concepts and their meaning in the context of the rights and obligations below and that he fully understands the following provisions.

### II. PROTECTION OF PERSONAL DATA

1. The protection of User privacy provided by Act no. 101/2000 Coll., On Personal Data Protection, as amended.
2. The Operator is also the administrator of personal data and the communication made by the Office for Personal Data Protection that it intends to process personal data and is registered under the registration number 00066660.
3. The User hereby gives the Operator as a manager pursuant to Act no. 101/2000 Coll., On Personal Data Protection, as amended (the "Act on the Protection of Personal Data") explicit consent to the collection, processing and use of personal information that the User provided or Operator provides, for the purposes indicated in the GTC or PP. The Operator handles personal data for the purposes of granting Licenses and for the purpose of offering business or services from the Operator, people connected with the Operator, the Operator, or business partners, for marketing purposes and for market research purposes. The Operator informs the User that the data in the first name, last name and address may be transferred to another administrator for the purpose of offering business and services. The User has the right of access to personal data, the right to correct personal data and other rights referred to in § 11, § 12 and § 21 of the Act on the Protection of Personal Data i.e. the right to the block, correct, supplement or liquidate personal data. Furthermore, User grants under Act no. 480/2004 Coll., On certain information society services, as amended, the Operator expresses consent to use your electronic contact details (e-mail address, mobile phone number) that the User has provided or will provide to the Operator, for sending commercial communications relating to products or services of the Operator, people connected with the Operator and / or business partners of the Operator through these electronic means of communication. The User acknowledges that the data may be, in accordance with the law on protection of personal data, made available to Third parties, and persons linked with the Operator in

order to provide technical and administrative support for the provision of services and to those in a contractual relationship with the Operator in particular, to ensure fulfillment rights and obligations under these Terms and processors, with which the Operator concluded a contract for the processing of personal data and only for the purposes set out above and in the necessary extent and subject to the proper protection of personal data. The User has the right to consent to data processing, which is performed on the basis of consent at any time. Consent under this paragraph is granted for an indefinite period.

4. The User agrees, with processing of personal data: Name, Last Name, Email address, Web address, currency used on the site, company name or site owner, ID, full address of the owner or company, the invoicing currency, IP address (also referred to as "Personal information").
5. Personal information shall be processed electronically in an automated manner.
6. Personal information shall be processed till the end of the cooperation purpose.
7. The User acknowledges that it is required to indicate their personal details and update correctly, truthfully, and according to the facts.
8. The User confirms that the personal information is true and that he was advised that it is voluntary to provide personal information. In case the User discovers that someone has illegally taken any information concerning the person of the User, including Username and password, it undertakes to inform the Operator about such matters promptly.
9. The User agrees to the processing of personal data by the Operator, for the purpose of realization of rights and obligations under the contract, for the purpose of sending commercial messages and information, and guidance for a User account on the Portal.
10. Processing of personal data of the User Operator may appoint a Third party as a processor. Personal data will not be transmitted to Third parties without their consent.
11. In the event that the User has the feeling that the Operator manages his Personal information against these PP or inconsistent with generally applicable legislation, the User may:
  - a. require the Operator to correct the situation,
  - b. Ask the Operator for an explanation.
12. The User is entitled to consent to the processing of Personal information appeal, and that the submission made to the contact email address of the Operator.

### III. PROTECTION OF PERSONAL DATA IN RELATION TO GDPR

1. A legitimate reason for the processing of personal data is the fact that such processing is necessary for the fulfillment of the agreement between the User and the Operator, in this case also the Personal Data Manager or for the implementation of the Operator's measures prior to the conclusion of a contract within the meaning of Article 6, (b) Regulation 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 (General Regulation on the protection of personal data).
2. Software without Input Data, does not store any personal data. Except for an IP address that the Operator does not impose for more than 3 months. This fact is reserved by the

Operator as a legitimate interest for the purpose of ensuring the quality of the service at the necessary level and security of operation of the Portal and the Software as such.

3. More detailed information regarding the processing of personal data is contained in the document "[Information on the processing of personal data](#)", which is an annex No. 1 to these PP. The User expressly declares that he has read and understood this document "[Information on the processing of personal data](#)".

#### IV. USE OF COOKIES

1. The use of the Portal, of which the User acknowledges and gives consent to the Operator on its Web site, uses cookies. These files are when you visit Web pages stored in visitor facilities in order to provide better services and above all the provision of services as such. If the visitor disagrees with the use of cookies, you can:
  - a. leave the webpage
  - b. disable cookies for this Portal - site functionality will be considerably reduced.
2. The User acknowledges that use of the Software on a website involves placing "cookies" to all visitors. The User also declares that he is aware of the obligations related thereto arising from generally binding legal regulations. The User declares that he is aware that if the Software is used for measuring "postview", entered the "cookies" to any site on which the ad was shown with portions of the Software.
3. The User takes responsibility for ensuring that visitors of websites that come into contact with the Software shall be informed in accordance with generally binding regulations, especially on how he uses anonymous cookies to track users.
  - a. Including tracking postview on various websites.
  - b. The User takes responsibility for informing visitors about the Opt out possibility.
4. Visitors of website that use this Software can opt out if they wish to be excluded out of tracking. This can be done by add this postfix "?analights\_opt\_out=true" to the websites url, that uses this Software.
  - a. Example of opt out url : [www.website.com?analights\\_opt\\_out=true](http://www.website.com?analights_opt_out=true)
  - b. Note: If the visitor of the website choose to opt out, he still receive cookie with indicator that he want to opt out. Visitor won't be tracked in future on the device and browser that he visited opt out url.
  - c. If the visitor cleans his cookie, the opt out decision will be canceled.
  - d. Opt out cookie have expiration in 10 years.
  - e. Opt out decision is only for specific website on specific device in specific browser. If visitor choose to opt out for more websites on more devices, he have to use example url link above for each website and device (Mobile, Tablet, Computer etc.).

#### V. SENDING COMMERCIAL MESSAGES

1. Registration of User, User agree to receive commercial communications and related information for services of Operator.

2. Sending commercial communications will be performed using the User's email.

## VI. FINAL ESTABLISHMENT

1. PP are available in Czech and English. The Czech version shall always prevail. The Operator in this case is not responsible for the accuracy of the translation.
2. The User and Operator undertake to settle any disputes amicably and respectively, using a mediator. In case solving their relations through the courts, the parties hereby in terms of §89a of Civil Procedure stipulate territorial jurisdiction of the District Court in Kladno.
3. In these PP, unless the context clearly indicates otherwise, the meaning of words in the singular is also the meaning of the word in the plural and vice versa.
4. Surveillance of the protection of personal data carried out by the Office for Personal Data Protection.
5. PP are stored and archived electronically operated and are not accessible to Third parties. PP these provisions and laws relating to the granting of contracts and PP these Users are not affected by this in any way.
6. In case of questions concerning these PP or the contract itself, Operator provides the User with all the necessary information.