

# Privacy Policy

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Your privacy is critically important to us. Our privacy policy will explain how personal information is collected, used and disclosed by PowerHUB applications and services. If you have questions or complaints regarding our privacy policies please contact us at [dpo@powerhub.cz](mailto:dpo@powerhub.cz).

## Identity and the contact details of the PowerHUB and protection officer

This Privacy Policy outlines guidelines for the information PowerHUB (E-Accelerator z.ú. as a PowerHUB, náměstí Kinských 741/6, 150 00 Prague 5, Czech Republic, ID: CZ05928541, as a „PowerHUB”, “Company” “Provider” or “us”) collects and process from the visitors of our Websites, users of the products and services, subscription to newsletter or contact our Customer Support (further from “you”, “client”, “user”). The data protection officer can be contacted at [dpo@powerhub.cz](mailto:dpo@powerhub.cz)

Client accepts the terms and conditions of this privacy policy by giving an explicit consent. If the client does not agree with the terms of this Privacy Policy, client is requested to immediately cease using and accessing the Websites as well as our products and services. Further using of our products and services might be limited or rejected. Our privacy policy does not restrict or limit our collection and use of aggregate information.

## Purposes and legal basis of the processing

PowerHUB collects PII that clients submitted to us voluntarily through our Websites and Your use of our products and services. We may collect Non-PII passively or actively. The types of PII and Non-PII we collect are:

- name, email, language
- telephone number, location data (GPS coordinates)
- server logs (access logs, error logs, security audit logs), IP address, country, city, device, browser type, operating system version, date and time of the device that uses the software services supplied by the data processor

Above mentioned PII are collected with purpose to keep you safe and to improve security and our services, to create and administer your account, to contact you, and to customize your experience with PowerHUB products and services.

To full service of CitySafety platform, you may also be asked to provide PII about a person other than Yourself, such as name, phone number, email. This PII is used only for the purpose for which You provide it to PowerHUB. The additional consent of this person will be requested via CitySafety platform. If you choose not to disclose certain personal information, it may limit your access to certain services or features. You can select to sign in or sign up to the CitySafety Platform through a social network (i.e., Facebook or Google), and you can connect your account with certain third party

social networks (further 3rd party). If you select to sign up through or connect via 3rd party, we receive certain profile and account information about you from the 3rd party, mainly name, email address and phone number.

PowerHUB may collect NPII through surveys for market research purposes to gain a better understanding of our customers, to improve our products and services, and to develop new products and services. The information we collect in such instances depends on the survey, but might include Your name, address, age, information about Your use of our services and products and the like. When you communicate with us (via email, phone, through the CitySafety Platform or otherwise), we may maintain a record of your communication. You represent, warrant and covenant that any PII that You supply to PowerHUB is true, complete and accurate in all respects.

Our Websites use Cookies to allow us to collect data about the visitors of the Websites and users of our service. As You navigate through our Websites, certain Non-PII may also be collected passively, e.g. country, device and browser type, operating system. We use Cookies that contain data necessary for the service to run correctly by default - user identification data that allows us to determine if a user is authenticated or not. We store additional data in Cookies If the user gives an explicit consent to do so as well, such as: preferred language and user interaction data that allows us to analyse website traffic.. We use these Non-PII data to measure the traffic on our Websites and to help us make our Websites more useful. We delete this information after a necessary period of time, no later than 12 months. PowerHUB may gather Non-PII from Your device when You are using it. The nature of the Non-PII that Your device transmits to us will not enable us to trace it back to an identifiable person, that provided a such information.

## How does PowerHUB processes data

Your PII is used by PowerHUB to perform its obligations resulting from the delivery of the PowerHUB products and/or services to You. PowerHUB uses Your PII also to respond to Your questions and to fulfil Your requests or to manage interactive customer programmes. After you will express active consent PowerHUB uses PII to contact You via email to inform You of our (new) products and/or services, promotions we may offer, to submit a customer survey and any other marketing activity. Without your active consent, you can not be contacted by PowerHUB in marketing matters. PowerHUB may use Your NPII to conduct market research, to improve our products and/or services, to provide more responsive customer service and to improve our Websites and related Communication Channels, products and services.

Your NPII are stored by PowerHUB in a central database and cloud databases. These databases are used by PowerHUB on a “need to know” basis in accordance with this Privacy Policy. We may also use PII to resolve disputes, collect fees, and troubleshoot problems or to prevent potentially prohibited or illegal activities, and enforce our terms and conditions. The Company stores the collected PII, the absence of which would limit the functionality of our services, throughout the entire period of providing Clients with our products/services. If our Company or our assets are acquired by another company, that company will possess the PII collected by us and it will assume the rights and obligations for Your PII as described in this Privacy Policy.

We do not intentionally gather PII about visitors who are under the age of 16, without parental consent. If we become aware that we have collected personal information from a child under the relevant age without parental consent, we take steps to delete that information.

## **PowerHUB has chosen to use secure and encrypted connection (SSL).**

Except as set out in this Privacy Policy, your personal Information will not be used for any other purpose without informing you first by updating this Privacy Policy. Except for the limited disclosures described in this Privacy Policy, we do not sell or provide customer lists or any PII to third parties, and we will endeavor to keep your PII. Anonymous aggregate statistics that do not personally identify PowerHUB user will be kept and used by us for various purposes including analysis and reporting of usage patterns.

## **Third Parties**

Third parties, such as our analytics or hosting provider (mainly various Google services - Google's privacy policy and terms & conditions), may have limited access to databases of user information or registered member information solely for the purpose of helping us provide or improve our products and they will not be able to use the information about you for any other purpose. We may disclose personal Information in some other limited circumstances, but we will specifically describe them to you when we collect the information, such as in the terms of use for a new service or by revising this Privacy Policy.

### **Hotjar**

We use Hotjar to analyze how users use our website. Hotjar uses a cookie to link your page visits as you navigate our website. You can also read Hotjar Privacy Policy

### **Zendesk**

This service helps us to manage our customer support and provides us with support statistics to help us improve our services. You can also read Zendesk Privacy Policy

### **Google**

Our applications use a few Google services. You can find a short description on how we use them hereunder. You can also read Google's privacy policy and terms & conditions.

### **GSuite**

We use GSuite by Google. All email we receive passes through Google Mail, and all data associated with email such as your email address and any headers are stored by Google. In addition we use Google Drive to store spreadsheets and other documents which may include your name and email address.

### **Google Analytics**

We make use of cookies from Google Analytics to obtain information on the quality and effectiveness of this website. You can also read Google Analytics Terms of Service

## Google Firebase

At the core of our platform stand various cloud services of the Google Firebase family. We use them to increase the usability and user experience of our applications and better their online / offline capabilities. These services also help us with authenticating our user base. You can also read Firebase Privacy Policy

## Our disclosure of Your information

We may disclose PII to respond to legal requirements, to enforce our policies, to respond to claims that a listing or other content violates the rights of others, or to protect anyone's rights, property, or safety. Such PII will be disclosed in accordance with applicable laws and regulations.

We may also share Your PII with:

Law enforcement or other governmental officials, in response to a verified request relating to a criminal investigation or alleged illegal activity. In such events, we will disclose information relevant to the investigation, such as name, city, state, telephone number, email address, user account history and IP address. Without limiting the above, in an effort to respect Your privacy, we will not otherwise disclose Your PII to law enforcement, other government officials, or other third parties without an official request, court order or substantially similar legal procedure, except when we believe in good faith that the disclosure of PII is necessary to prevent imminent physical harm or financial loss or to report suspected illegal activity.

## Data management and unsubscription

The Client/Data Subject shall be entitled to demand access to their personal data, its correction, limitation of data processing or its complete deletion. In case of sending an electronic request via the e-mail address: [dpo@powerhub.cz](mailto:dpo@powerhub.cz) , it is necessary to place and send a demand for exercising the rights of the Data Subject from the contact e-mail address. If another e-mail address than the contact one is sent and stated, it shall not be possible to verify the applicant and the request shall be denied.

In all our products and services or newsletters, You have the opportunity to "opt-out" by following the unsubscribe instructions provided or by contacting us directly at [dpo@powerhub.cz](mailto:dpo@powerhub.cz) . However, regardless of Your indicated preferences, we may send You service e-mails regarding our products and services or notices of any updates to the terms and conditions or Privacy Policy according settings in your personal web account. You may change any of the PII in Your account by editing Your account information. You must promptly update Your PII if it changes or is inaccurate. If you have registered with us and wish to access or update your profile, or exercise certain opt-out rights, you may do so online by visiting the "profile" settings, in your account, on PowerHUB web page. In addition, users may also have the right to be provided certain personal information in a commonly used format where technically feasible, and, under certain conditions, to object to or restrict our use of certain personal information. You may also contact our privacy officer, as set forth below, to access or amend your personal information, to request that we rectify, delete or stop processing your personal information, to withdraw your consent to our processing. If you choose Delete Your Account in your privacy settings, then all of Your Content will be removed, and it may not be restored by us, even if you change your mind.

The Client shall be entitled to raise objections against processing of their personal data (request for change, correction or deletion of information on data subject). The Client is obliged to provide an explicit notification about any such objection and the information must be provided clearly and separately from any other information.

The Client has right to personal data portability within the extent and in form in which it has been provided to the Controller. The right to portability shall apply to personal data concerning the Data Subject which has been provided to the Controller. The right to portability shall not apply to processing the personal data necessary to fulfill a task realized in the public interest or when exercising the public authority entrusted to the Controller.

If the Data Subject believes that their personal data is being processed in a manner which is unfair or unlawful, it shall be entitled to bring proceedings on personal data protection with surveillance authority which is represented by the Office for Personal Data Protection of the Czech Republic, Pplk. Sochora 727/27, 170 00 Praha 7-Holešovice, Czech republic. Any legal proceedings with the Controller shall take place in the territory of the Czech Republic and shall be governed by the laws of the Czech Republic.

## Privacy Policy Updates

This Privacy Policy is subject to occasional revision, and if we make any substantial changes in the way we use Your PII, we will post a notice on our web page and/or in our apps for asking you with active confirmation. If You object to any such changes, using of our products and services might be limited or rejected.