

The protection of our clients' personal data is a priority for us, and for this reason we would like to welcome the General Privacy Protection Regulation GDPR (General Data Protection Regulation), which up until today is the most comprehensive set of legislation in regards to the protection of personal data. The Regulation (EU) 2016/679 (GDPR) is a legal framework for the protection of personal data across the EU, which protects the rights of its citizens against the unauthorized handling of their data and personal information. The GDPR overwrites all the existing regulations of protection and processing of data represented by the Union's privacy system, and it confirms that the protection of personal data travels across borders. The General Data Protection Regulation outlines how we approach personal data processing and what steps we take to ensure its security. All of this is in accordance with the GDPR and the valid legal framework of the Czech Republic.

I. Products of SuperNetwork s.r.o.

SuperNetwork s.r.o.

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SuperNetwork has been on the Czech market for 13 years. We provide innovative and customized solutions for each of our clients. We rent out dedicated servers and offer space for the placement of servers or racks.

Server Housing

Placing your own rack server in a modern datacenter, which is fully secured 24 hours a day, 7 days a week. Entrance into the Datacenter is only permitted to authorized persons.

Rack Housing

This pertains to a rack or rack rental, where the customer places their own servers in a data center that is fully secured 24 hours a day, 7 days a week.

Dedicated server

As part of the service for a dedicated server, you rent a server that is owned by SuperNetwork. The server is always reserved for only one customer. As with server housing and rack housing, the server is located in a modern data center that is fully secured.

Part of the service for dedicated servers includes 24/7 technical support and the guarantee of HW repair within two hours of the customer's request.

Managed server

This pertains to a dedicated server with extended administration.

The following is included in the service:

- Complete server management, adjustment of settings, assisted server changes, 24/7 monitoring and the guarantee of HW repair in case of a malfunction.
- Installation of a server under Linux or Windows. We offer virtualization and management of more virtual servers.

- Security settings and regular security updates. The customer is provided with secure access to the server.
- Regular backup of data and databases to a physically different location. We set up the procedure for backup as requested by the customer.
- Optimized set up for the database configuration, duplication, operation and backup of large databases on SSD disks.

II. What kind of personal data we process

We always process the data you provide us with and the data that we need in order to fulfill our services and obligations in the highest possible quality.

In some cases, there may need to be data provided by filling out one of the forms on the website, entering data into the user account created on our website, as well as providing data in order to complete a contract, and other related documents which are necessary for the execution of contract conditions. (ie relating to the supply of goods, the provision of services), by personal contact, telephone, in writing, or by e-mail.

In some cases, we also process data from public registers (especially for verifying or entering your identification details into contracts).

If we need to process some personal data for a specific purpose that requires your consent, we will always inform you about this and we will only process the data for this specific purpose with your explicit consent.

In regards to the data that you provide us voluntarily, in some cases without this data we wouldn't be able to complete your order for goods and services. However, you are only required to provide us with the data in cases where it's clearly stated by law.

Personal data may fall under the category of „normal personal data“ or it may be a specific category of data, for example, sensitive data, when stricter conditions must be fulfilled for processing.

- Common personal data: name, surname, title, address, PO number (which is required to enter the data-center) telephone number, e-mail, IP address, information about or description of the goods and services you ordered from us, information on which goods you purchased from us, and information about what services we have provided.
- Sensitive personal information: We do not process any specific categories of sensitive personal information.

III. Protection of Personal Data and information about its processing

For those to which it applies, these Participants are subject to Act No. 101/2000 Coll., on the Protection of Personal Data, as amended, and other relevant legislation.

The Participant is aware that upon sending a completed registration form, the subsequent processing of Personal Data by the Operators begins.

If the Participant fails to provide his / her Personal Data, it is not possible to enter into a contract with the Operator and / or provide him / her with services. This Personal Data is necessary in order for the Operator to proceed with the provision of a particular service or product.

Providing Personal Data to the Provider is generally a contractual and legal requirement. In regards to providing Personal Data for marketing purposes that doesn't pertain to the fulfillment of contractual and legal obligations of the administrator, consent is required. If the Participant does not give the Operator consent to process Personal Data for marketing purposes, it does not necessarily mean that the Operator would therefore refuse to provide its services to him / her.

Personal data will be processed during the period of finalizing contract negotiations between the Operator and the Participant, as well as for the duration of the contractual relationship or for the period specified in the agreement.

In order to fulfill the statutory obligation of archiving accounting documents pursuant to Act No. 563/1991 Coll., on accounting, as amended, Personal Data (except e-mail address and telephone number) will be further processed and kept for 5 years, starting one year following the year in which the agreement between the Operator and the Subscriber has gone into effect.

After expiry of the period in reference to in Article III. (5) (6) and (7) The Operator shall dispose of personal data.

The Participant is required to provide the Operator only with true and accurate Personal Data.

The Operator shall make every effort to avoid the unauthorized processing of Personal Data.

IV. Datacenter Security

The server room is monitored by a 24/7 security service with connection to the Central Protection Desk (PCO connection). In the server room there is non-stop surveillance available. All doors are equipped with a smart card sensor chip and entrance can only be enabled with this chip.

The data center area is divided into 4 security zones, which are subject to special measures and rules. The physical security of the data center's workplace is handled by the Internal guidelines for movement in the datacenter.

V. Backup & Data Security Description

During the backup process, all data is transmitted securely and is not openly legible under any circumstance. At the time of transmission, and even during the storage process, the data itself is already in encrypted form. In order to read it, access to the private key of the source server or to the safeguarded master key is necessary.

VI. Guarantee of Personal data protection for the above-mentioned services

Within the framework of the above-mentioned Server housing services, Rack housing and Dedicated server, we only guarantee the physical security of the server in the datacenter, which is governed by ISO27001 and ISO9001 with our internal data center guidelines. Our company is not a GDPR data processor for these services because we do not have access to the data that is stored on the server. When providing these services, the customer (administrator) bears all liability regarding the accuracy of data stored on our servers.

In the case of providing services for a Managed Server and data backup services, our company acts as a Processor of Personal Data, however the data is not further processed and used by our company for third party purposes or for direct marketing. Proper data storage and manipulation of it is handled internally by the regulations of the General Data Protection Regulation (GDPR), which goes into effect on 25 May 2018. This regulation enforces the obligation of authorized persons to handle personal data of the client (administrator). In regard to the service for the Managed Server, the above mentioned ISO27001 and ISO9001 are also valid with our internal data center guidelines.

VII. Exemption of liability

We would like to inform you that, in all of the following cases, our company SuperNetwork is not held liable for, and cannot be held liable for leaked data and inadequate data security, misuse and transfer of it to third parties. However, our customer support is always glad to advise you on how to minimize potential risks on your part and how to improve your data security. Don't hesitate to get in contact with us. We cannot be held liable when the customer:

- still hasn't provided cooperation for setting security measures even after repeated requests
- uses systems without the latest updates, such as the WordPress editorial system
- uses FTP to connect to the server
- refuses to update the system
- refuses to upgrade to the Linux operating system
- does not have a properly programmed application and it breaks down
- operates an application that has been hacked (there will be a „hacking“ of the application)
- made the database system available on a public interface
- manages the configuration of a service on a public interface

VIII. Processed contracts

A processed contract will only be finalized in the cases outlined below, in which the administrator provides the processor with the following information:

- Output of inspection and audit regarding the nature of the data being processed
- What kind of data the administrator processes, for what purpose, and how the data is stored and secured.
- The nature of the data that is processed - personal data x sensitive data

If the processor does not provide the information outlined above, the processing of the contract cannot be finalized. Providing us with information on the nature of the data which is to be processed, its volume, purpose, and security, gives us the means to draw up a custom-made processed contract.

IX. Making personal information available to others

In order to ensure that some of our contractual or legal obligations are met, we have other people who assist us as processors. We are specifically referring to an accounting partner, law firm, data warehouse provider, and software applications. We have written agreements with all of these processors in order to ensure that your personal data protection obligations are met and that your data is kept safe.

Personal data will also be made available to the relevant administrative authorities if such a need arises and is enforced by the law (ie we are specifically referring to an inspection or official control in which the authority is authorized to request the submission of personal data)

X. Information regarding your other rights in the protection of personal data

The Participant has the right to withdraw their consent to process their provided Personal Data at any time (in cases in which the processing of Personal Data is subject to consent). However, the withdrawal of consent to process Personal Data is not possible in cases in which the Operator has a legal obligation to do so. The withdrawal of consent is without prejudice to the lawfulness of processing based on the consent given prior to its withdrawal. The withdrawal of consent also does not affect the processing of Personal Data which is processed by the administrator on a different legal basis other than the one for consent (ie, in particular, if the processing is necessary to fulfill the contract conditions, legal obligations, or for other reasons stated by law). You can withdraw your consent by filling out the form / by unchecking the box / by sending the withdrawal to the Operator's address of business or via email communication.

The Participant also has the right to:

- **Be informed about the processing of their Personal Data**

The Participant is entitled to request information from the Operator on whether or not their Personal Data has been processed. If Personal Data has been processed, the Participant has the right to request, in particular, information pertaining to the identity and contact details of the Operator and his / her representatives, and where applicable, the Data Protection Officers, the purpose for which the data was processed, the categories of the Personal Data in question, the recipients or categories of the recipients of the Personal Data, the rights of the Operator, the list of rights of the Participant, the ability to get in contact with the Office for Personal Data Protection, the source of processed Personal Data, and any automated decision-making and profiling.

If the Operator intends to further process the Personal Data of the Participant for a purpose other than that for which it was obtained, the Operator will provide the Subscriber with information about that other purpose and other relevant information before it will be further processed.

- **Requesting the Operator for access to its Personal Data**

The Participant is entitled to request information from the Operator on whether or not their Personal Data has been processed and, if so, has access to information on the purpose of its processing, the categories of the Personal Data in question, recipients or categories of recipients, the time period for storing the Personal Data, information on the Participants' rights (rights to request the Operator for the correction or deletion, limitations for processing, objection to such processing), the right to file a complaint to the Personal Data Protection Office, information on the source of the Personal Data, whether automated decision-making, profiling, and information for the procedure

has been used, as well as the expected implications for such processing, information and any assurances in the case Personal Data is transferred to a third country or an international organization. The Participant has the right to obtain copies of the processed Personal Data. The right to obtain these copies, however, must not adversely affect the rights and freedoms of others.

- **Changes in the provided Personal Data**

If, for example, there has been any change in the place of residence, telephone number, or other personally identifiable information of the Participant, the Participant has the right to require the

administrator to correct the processed Personal Data. In addition, the Participant has the right to supplement any incomplete Personal Data, which is to be provided by an additional statement.

- **The deletion of the Personal Data provided**

In specified cases, the Participant has the right to require the Operator to delete their Personal Data. Such cases include, for example, that the data processed is not necessary for any of the purposes mentioned above. The Operator of the Personal Data will automatically delete it after the expiry of the period, however, the Participant may at any time submit their request for deletion. The Participant's request is then subject to an individual assessment (despite the right of the Participant to delete their Personal Data, the administrator may have an obligation or a legitimate right to retain the Personal Data of the Participant), and the Participant will be informed about the details of its execution.

- **Limitation of the processing of Personal Data**

The Operator processes the Personal Data of the Participant only to the extent necessary. However, if the Participant feels that the Operator, for example, has exceeded the above stated purposes for which Personal Data is processed, the Participant may submit a request that his / her Personal Data be processed solely for the most necessary reasons stated by law or to block their Personal information. The Participant's request is then subject to individual assessment and the Participant will then be informed about the details of its execution.

- **Submitting a complaint to the Office for Protection of Personal Data.**

The participant may at any time file a complaint or a complaint regarding the processing of Personal Data to the Supervisory Authority, at the Personal Data Protection Office, at Pplk. Sochora 27, 170 00 Praha 7, website at <https://www.uoou.cz/>.

- In the case that the Participant has reason to believe that the Operator is carrying out or has carried out the processing of his or her Personal Data in violation to the protection of his / her private and personal life, or in violation of the law, or if it is suspected that any Personal Data is unnecessary for the purpose of processing, the Participant may:

Request an explanation from the Operator by e-mail at obchod@superhosting.cz;

Object to the processing of Personal Data which can be requested by e-mail at obchod@superhosting.cz, in order to ensure that Operator resolves the situation (eg by blocking, making corrections, supplementing or disposing of Personal Data). The Operator shall promptly resolve and inform the Participant about the objection. If the Operator finds reason not to comply with the objection, the Participant has the right to contact the Office for Personal Data Protection directly. This provision is without prejudice to the Participant's right to get in contact directly with the Office for Personal Data Protection with his/her complaint.

The participant may exercise its above mentioned rights in writing to Na Šafránce 33, Prague 10 101 00 or electronically at obchod@superhosting.cz.

- If the Participant requests information about the scope or manner in which their Personal Data is processed, the Operator is required to provide information without delay, no later than one month from the day that the request was received by the Operator.
- If a Participant exercises the right to access Personal Data in electronic form, the Operator will also provide the requested information in electronic form, unless the Participant requests a different means of providing information.
- The Operator has the right, in the event of a repeated or unjustified request to provide a physical copy of the Personal Data processed, to charge a fee reflective of the associated administrative costs.
- Personal data is automatically analyzed and can be used for profiling or automated decision making for the

administrators' marketing activities. The operator uses the following methods:

Analysis of your activities on the administrator's website.

- The Participant's behavior on the Website will be mapped and analyzed, which on one hand represents a kind of interference with the right to privacy, but at the same time this evaluation affects what kind of promotional offers are to be sent from the Operator to the Participant, and which could be of interest to the Participant based on the results of the analysis.

XI. Other important information for exercising your rights

In case you have further questions for us about the processing of your personal information, you can contact us via email at shop@superhosting.cz. You can also directly exercise your rights to the address that we have listed above in Article X. We'd just like to point out that in order to proceed with your request, we may contact you and verify your identity which will ensure that your request is properly processed. The same applies to any telephone call and similar forms of communication.

XII. Concluding Provisions

All legal relationships that arise in relation to the processing of Personal Data are governed by the laws of the Czech Republic, regardless of the location from which access has been made. The relevant Czech courts are to resolve any disputes arising between the Participant and Operator in relation to the protection of personal data.

For Participants who provide their Personal Data by means of a registration form or provide their Personal Data for the purpose of finalizing a contract with the Operator or giving their consent for the processing of Personal Data, they do so voluntarily on their behalf, and the Operator has by no means any control over their activities in this way.

The Operator may change or make an addition to the text of the Policy. For any change that occurs, the Operator will notify the Participants by email at least 30 days prior to the day that the change goes into effect.

These policies become effective starting May 25, 2018.