

Personal Data Processing and Protection Policy

Information memorandum pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR)

Version: 2.0

Effective from: 5 May 2026

Issued by: ELEKTRON-ETTO, s.r.o.

1. Introductory provisions

ELEKTRON-ETTO, s.r.o. (hereinafter the „**Controller**“) is aware of the sensitivity of the personal data of its clients, business partners and other data subjects and fully respects their right to privacy. By means of this document, the Controller fulfils the information obligation pursuant to Articles 13 and 14 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 („**GDPR**“), and pursuant to applicable national legislation.

The Controller processes personal data exclusively to the extent necessary for the purposes set out below, for the strictly necessary period and in accordance with applicable legal regulations.

2. Identity and contact details of the controller

Company name	ELEKTRON-ETTO, s.r.o.
Registered office	Školní 185, 753 66 Hustopeče nad Bečvou, Czech Republic
Company ID No.	26906040
Commercial register	Regional Court in Ostrava, Section C, File 44529 (CZ)
Telephone	+420 581 626 366
E-mail	info@etto.cz
Website	www.etto.cz

The Controller has not appointed a Data Protection Officer (DPO) as this obligation does not arise under Article 37 GDPR.

3. Categories of personal data processed

In the course of its activities, the Controller processes the following categories of personal data in particular:

Identification data – first name, surname, academic title, date of birth, company ID and VAT ID for self-employed persons;

Contact details – registered office / residence address, delivery address, telephone number, e-mail address;

Contractual and billing data – bank account number, data on orders, deliveries, complaints and payment history;

Communication data – content of correspondence (e-mail, letter), records of telephone calls related to the business relationship;

Technical data – when visiting the Controller's website: IP address, browser data and behaviour on the website (only within the scope of cookies).

The Controller **does not process** special categories of personal data (so-called sensitive data) within the meaning of Article 9 GDPR.

4. Purposes of processing and legal grounds

Personal data is processed mainly in connection with the manufacture and sale of electric resistance heating elements and related commercial and service activities. Processing always takes place on one of the following legal grounds (Article 6(1) GDPR):

Purpose of processing	Legal ground (Art. 6 GDPR)	Retention period
Conclusion and performance of contract / order, delivery of goods, handling of complaints	Performance of contract [Art. 6(1)(b)]	For the duration of the contractual relationship and 4 years thereafter (limitation period)
Bookkeeping, issuing and archiving of tax documents	Compliance with legal obligation [Art. 6(1)(c)]	10 years from the end of the tax period (Czech VAT Act No. 235/2004)
Archiving of accounting records	Compliance with legal obligation [Art. 6(1)(c)]	5 years (Czech Accounting Act No. 563/1991)
Protection of legitimate interests of the Controller – property protection, debt collection, dispute resolution	Legitimate interest [Art. 6(1)(f)]	For the duration of the legitimate interest, max. 4 years from termination of the relationship
Direct marketing to existing customers – offers of related goods and services	Legitimate interest [Art. 6(1)(f)]	For the duration of the business relationship, max. 3 years from the last order
Marketing communication outside an existing relationship (newsletter)	Consent of the data subject [Art. 6(1)(a)]	Until consent is withdrawn, max. 5 years from granting
Warranty service and long-term complaints	Compliance with legal obligation [Art. 6(1)(c)]	For the duration of the statutory warranty and 4 years thereafter

Provision of personal data to the extent necessary for concluding and performing the contract is a contractual requirement. Without such data, the contract cannot be concluded or performed. In other cases, the provision of data is voluntary.

5. Recipients and categories of recipients

Personal data may, to the extent necessary, be disclosed to the following categories of recipients, acting either as independent controllers or as processors based on a processing agreement under Article 28 GDPR:

Providers of accounting and tax services – external accounting firm, tax advisor, auditor;

IT service providers – information system administrator, hosting and cloud service providers, providers of accounting and CRM software;

Transport and logistics partners – entities ensuring the delivery of goods to customers;

Legal service providers – law firm in case of debt collection or dispute resolution;

Banks and payment service providers – to the extent necessary for processing payments;

Public authorities – tax office, courts, police, trade inspection and other state authorities within their statutory powers.

6. Transfer of personal data to third countries

The Controller **does not transfer personal data to third countries** outside the European Economic Area or to international organisations. Should such a transfer occur in the future, it will be carried out only in compliance with the conditions of Articles 44 to 49 GDPR (adequacy decision, standard contractual clauses, etc.) and the data subject will be informed in advance.

7. Automated decision-making and profiling

When processing personal data, **no automated decision-making** within the meaning of Article 22 GDPR takes place that would have legal effects on the data subject or similarly significantly affect them. The Controller does not carry out profiling to this extent.

8. Security of personal data

The Controller has implemented appropriate technical and organisational measures to ensure an adequate level of security of the processed personal data, in particular:

- physical security of operational premises and archives;
- managing employee access on a „need-to-know“ basis;
- password protection of information systems, encryption of sensitive communication, regular data backups;
- contractual obligation of confidentiality for employees and processors;
- regular review and update of the implemented measures.

9. Rights of the data subject

In connection with the processing of personal data, the data subject has the following rights vis-à-vis the Controller, which may be exercised in the manner set out in Section 11 below:

Right	Brief description	GDPR Art.
Right of access	To obtain confirmation as to whether personal data is being processed and a copy of the processed data.	Art. 15
Right to rectification	To request rectification of inaccurate or completion of incomplete personal data.	Art. 16
Right to erasure („right to be forgotten“)	To request erasure of personal data if no longer needed or if processing was unlawful.	Art. 17
Right to restriction of processing	To request restriction of processing in cases set out by law.	Art. 18
Right to data portability	To receive provided data in a structured, commonly used and machine-readable format.	Art. 20
Right to object	To object to processing based on legitimate interest or for direct marketing purposes.	Art. 21
Right to withdraw consent	To withdraw granted consent at any time (in part or in full). Withdrawal does not affect the lawfulness of previous processing.	Art. 7(3)
Right to lodge a complaint	To lodge a complaint with the supervisory authority (see Section 12 below).	Art. 77

The Controller will handle the request to exercise rights **without undue delay, no later than one month** from receipt. This period may, if necessary and considering the complexity and number of requests, be extended by a further two months; the data subject will be informed of any extension and the reasons for it. The request is handled **free of charge**, except for manifestly unfounded or excessive requests.

10. Cookies and similar technologies

The Controller's website may use cookies. Technical (necessary) cookies are used on the basis of the Controller's legitimate interest in ensuring the functionality of the website. Analytical and marketing cookies are used only on the basis of the visitor's consent, which can be withdrawn at any time in the browser settings or via the cookie bar.

11. Exercising rights and identity verification

To prevent the misuse of rights by an unauthorised person and the transfer of personal data to a third party, the Controller is obliged to verify the applicant's identity. The request may be submitted in the following ways:

- In person** at the Controller's registered office upon presentation of a valid identity document;
- Via Czech Data Box** (if the applicant has one) – preferred method, identity is verified automatically;
- By post in writing** with an officially certified signature to the Controller's registered office;
- By e-mail** from the e-mail address registered with the Controller, or by e-mail with a qualified electronic signature.

Handling of requests to exercise data subject rights by telephone is not supported due to the impossibility of reliable identity verification.

12. Supervisory authority

If the data subject believes that the Controller processes their personal data in violation of GDPR or other legal regulations, they have the right to lodge a complaint with the supervisory authority, which for the Controller is:

Úřad pro ochranu osobních údajů (ÚOOÚ)
(Office for Personal Data Protection of the Czech Republic)
Pplk. Sochora 27, 170 00 Prague 7, Czech Republic
Phone: +420 234 665 111
E-mail: posta@uouu.cz | Web: www.uouu.cz

The data subject may alternatively lodge a complaint with the supervisory authority in the Member State of their habitual residence, place of work or place of the alleged infringement. A list of EU supervisory authorities is available at edpb.europa.eu.

13. Contact in matters of personal data protection

Any inquiries, requests or objections regarding the processing of personal data may be addressed to the Controller in the following ways:

By post	ELEKTRON-ETTO, s.r.o. Školní 185, 753 66 Hustopeče nad Bečvou, Czech Republic
By e-mail	info@etto.cz
By phone	+420 581 626 366 (general inquiries only)

14. Final provisions

This Personal Data Processing and Protection Policy is the currently valid version of the document. The Controller is entitled to update its wording at any time; the current version is always published on www.etto.cz. This version becomes effective on **5 May 2026** and supersedes all previous versions.