



General information

Company improtech s.r.o. is a controller of personal data of customers using our PhotoRobot services or products and potential customers who are interested in our offer (filled in contact forms or signed for newsletter). This means that we collect and use such data (process personal data) to perform customer orders, provide services, support (especially warranty support) and inform about our products and services.

Since our products and services are focused to business customers - not to consumers, most of the data we process are not personal data.

This Privacy Policy is designed to protect personal data, although it also governs how we use all information we obtain about our customers (including “non-personal data”). In cases where this Policy applies to any data we process about our customers or potential customers, we will use the term “data”, while “personal data” will mean only data about the identity of individuals.

The Privacy Policy is in line with the provisions on the protection of personal data, in particular with 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 (General Data Protection Regulation, hereinafter referred to as the GDPR). The rules of the GDPR govern the processing of any personal data of individuals from any Member State of the European Union.

We treat the received data as confidential, which is why we do our best to protect them as far as possible against unauthorized persons. For this purpose, we use technical means, such as e.g. secure communications protocols. All our employees who come into contact with your data have been properly trained to process them.

We respect your right to privacy. We only use the information you provide to us for the purpose for which it was collected with your consent or pursuant to legal provisions allowing us to do so.

You will learn from this Privacy Policy, how we use the information, how you can protect your privacy and what rights you have in relation to your personal data. Please read it carefully and contact us if you have any questions.



Data we collect

Due to the fact that our offer is addressed mainly to business customers (B2B) and not to consumers (B2C), we primarily collect data concerning companies (enterprises) interested in or already using our products and services. They may also include personal data of their representatives and employees.

The information is provided to us either by the interested parties themselves via our website (contact forms, newsletter subscriptions), by e-mail or telephone and by personal contact (e.g. at trade fairs), or is collected by us automatically via cookies or similar technology.

In the contact forms on our websites (on the website you can choose different language versions, the English version is available at: <https://photorobot.com>), we ask you to provide the company name, company e-mail address, phone, country and possibly the name and surname of the contact person.

You can also subscribe to our newsletter via our website by entering your e-mail address and clicking the “Subscribe” button. Our newsletter may contain information about our products, news, etc. You can opt out from receiving it at any time.

In order to process your purchase order, issue an invoice and deliver the products, we will need additional information as required by law (e.g. a invoice address and tax identification number of your company).

Remember, that by providing us with your data you do it voluntarily. You have no legal or contractual obligation to do so. However, some details may be necessary, for example, to process your order (company name, invoice address, tax identification number). Without such information we may not be able to sell you our products nor provide services.

Data collected automatically are data about the activity of visitors to our website, collected using the so-called cookies or similar technologies (see section “Use of cookies”). They allow us to constantly improve and adjust our websites and offers to the customer’s preferences.



Use of the PhotoRobot Cloud Service

We own and manage the Photorobot cloud website available at cloud.photorobot.com and account.photorobot.com. It provides a 360/3D/2D multimedia presentation management service. The Service also serves the users solutions to manage purchased licenses for PhotoRobot software and to buy additional services such as technical support and extended warranty.

A user of the Service is a company (entrepreneur) registered in the Service. In order to register, you need to provide a company name and a user e-mail. The data of the company registered in the Service are not visible to other users using the Service, except for PhotoRobot and it's sale partner (e.g. a subsidiary company, or distributor), who has made a sale of any PhotoRobot product to the company. The data is used by PhotoRobot and it's sales partners to provide warranty and technical support service. The company that owns the account can manage access to the account by individuals (e.g. its employees or co-workers).

If you become our customer, i.e. you have purchased one of our products, you will receive an invitation e-mail from us, which will allow you to register with the Service.

If you are not our customer yet (you have not used our products yet), you can register in the Service (create a company account) by providing the above data and choosing a password to the account. Free registration will enable you to test our PhotoRobot Cloud Service.

If you register with the Service on its website, you may also give your consent to receive, at the e-mail address provided, commercial communications containing news about our product and service offerings. The information is sent in the form of a marketing newsletter.

You can unsubscribe from receiving the marketing newsletter at any time in your account settings or by clicking the unsubscribe button in the newsletter.

Other parts of the Privacy Policy also apply to the data of PhotoRobot Cloud users. Please read them carefully.



Use of cookies

Through our websites, including PhotoRobot Cloud Service, we use cookies and similar local storage technology. Cookies are information technology data containing a small amount of text which are sent by a web server to a user's browser when he or she accesses web pages.

We use cookies and local storage files for the purpose of:

- adapting the content of the pages to the user's preferences and optimising the use of those pages; produce statistics that help us understand how visitors to our websites use them; for this purpose, we also use Google Analytics, an external web analysis service provided by Google Inc., with its own cookies
- ensuring efficient operation of our websites, including all functionalities of the PhotoRobot website
- providing users with adverts that are relevant to them by collecting information about their browsing habits and site usage as provided by Google with their own cookies

By default, web browsers allow cookies to be placed on the user's computer. You can change the conditions for storing and accessing cookies by yourself in the settings of your browser (see your browser's help system for information). If you do not agree to the use of cookies, please change your browser settings accordingly. If you do not do this when you view our website, you will be consenting to the use of cookies for the above purposes.

More information on how Google use your data can be found here:

<https://policies.google.com/technologies/cookies?hl=en-US>

To change your cookie settings, you can use the button below.

COOKIE SETTINGS

Please note that blocking cookies may cause difficulties in using certain functionalities of the PhotoRobot Service.



Use of data and legal basis for it

We use your data only for the purposes for which you have given us your consent or for which we are entitled by law, in particular under the GDPR provisions.

The data provided to us for the purpose of purchasing our products are used for the execution of customer orders and after-sales service (warranty and post-warranty support). Similarly, data concerning the users of PhotoRobot Site are used to provide the PhotoRobot Service, including communicating to them (technical) information concerning operation of the Service. In this respect, the legal basis for our processing of personal data is Article 6(1)(b) of the GDPR provisions (processing of personal data is necessary for the performance of the concluded contract without the requirement of obtaining a separate consent for such processing).

If you are already our customer and use our products, you can receive from us at the indicated e-mail address marketing information about our current offer, novelties and products improvements. It will be mailed to you in the form of a newsletter after your company has been registered with the PhotoRobot Service. The legal basis that allows us to do so is the so-called legitimate interest of the controller (in accordance with Article 6(1)(f) of the GDPR provisions). However, you may object at any time to receiving such commercial information by not giving your consent to register with the PhotoRobot Service (rejecting the activation e-mail received from us), by changing settings in your account preferences or by deleting your account.

If you are not using our products yet (you are not our customer) but you have subscribed to the marketing newsletter (upon registration in the PhotoRobot Cloud Service or through our website), we will use the data provided by you, including your e-mail address, to send the newsletter.

If you send us a product related inquiry through e-mail or using any of contact form, we will only give you information (send email or phone you) related to this inquiry.

In the above cases, the legal basis for processing your personal data is your consent to receive specific commercial information (in accordance with Article 6(1)(a) of the GDPR).



You can unsubscribe from receiving our newsletter at any time simply by clicking “unsubscribe” button in the newsletter.

Data collected automatically (by means of cookies or similar technologies, such as local storage) are used by us to analyse the behaviour of visitors to our websites, to collect statistical information related to it and to personalize our websites. All this to improve the quality of our services and the attractiveness of our offer (for more information on how to block cookies, see the section “Use of cookies”).

Any data we hold will not be passed on to any other person or entity for advertising or commercial purposes.

Retention period for data

The data we hold are processed (i.e. used) by us in principle for the period necessary to achieve the purpose for which they were collected, i.e. to perform the contract for the customer, provide after-sales service (warranty and post-warranty support), provide PhotoRobot Cloud Service, send newsletter or communicate other information requested by the user (customer).

This does not mean, however, that once we have achieved the above purposes, we will immediately delete all the related data. The obligation to store the data for a longer period of time may result from the provisions of law (in accordance with Article 6 (1) (c) of the GDPR). This applies in particular to tax, accounting and statistical regulations, which require e.g. storing data on commercial transactions with customers for a specified period of time.

Moreover, in order to secure the data collected in our IT system, protect it against loss due to system failure, capture and eliminate potential violations of personal



data, we create back-up copies (backups) containing comprehensive data of the IT system for the time necessary for the above purposes (X months). The objective of achieving appropriate level of data security excludes the possibility to delete individual information (including specific personal information) from the backup copy. The legal basis for such data storage is the legitimate interest of the controller (in accordance with Article 6(1)(f) of the provisions of the GDPR).

Data protection and data security

In order to ensure the best protection of the data transferred to us against their disclosure to unauthorized persons, we have applied a number of technical, IT, organizational and legal safeguards:

- we collect data on our own server, located in a separate, guarded place; data from the PhotoRobot site or PhotoRobot Cloud service are stored on secure Google cloud servers located in the European Union
- the premises in which we process data are protected by numerous physical security measures against unauthorised access
- we use an internal firewall-protected network that is not accessible from the outside
- we use communication encryption to our servers using SSH protocol and our servers can only be accessed by authorized person
- we back up personal data (backups) in order to protect them against accidental loss or intentional destruction
- we have implemented appropriate procedures to collect and process personal data in accordance with the provisions of the GDPR, we monitor and enforce their observance; in the case of a personal data breach we are obliged to notify to the national data protection supervisory authority
- if the processing of personal data takes place with the participation of an external service provider, we use the services of only reputable companies, that ensure appropriate level of security and protection of the personal data entrusted to them



Entities with access to data

With a view to provide efficient and professional service to our customers, we also use IT solutions and tools developed by other companies. Therefore, personal data processed by us may be entrusted to external service providers to a certain extent. However, we select only those service providers that provide adequate guarantees for the protection of the data entrusted to them.

In relation to the data entrusted to them, we still remain the controller of the data and exercise control over them.

As far as processing of personal data for the purpose of sending newsletters to our customers is concerned, we use the external MailChimp mailing platform.

For efficient handling of customer enquiries and requests, we use Copper CRM platform.

The data of the users of our services are stored on a secure Google cloud server located within the European Union or United States.

The companies listed above, based in the USA, should ensure a level of protection of personal data in accordance with the provisions of the GDPR, as they are certified participants of the Privacy Shield Framework, regulating the secure transfer of personal data from the European Union countries to the USA. (For more information and contact details of these companies, please refer to their privacy policies on their websites)

We are also obliged to provide personal data held by us if such a request is made to us by authorized public authorities, e.g. the police, the public prosecutor's office, a court as well as the data protection supervising authority.

The data will not be passed on to other persons or entities for advertising or commercial purposes.



Your rights under the GDPR regulations

In accordance with the provisions of the GDPR stipulating personal data protection for EU companies to which this Privacy Policy complies, you have especially following rights with respect to your personal data, of which we are the controller:

- the right to obtain confirmation from us as to whether or not we are processing your personal data and, where this is the case, the right to access your personal data and receive information about your specific data we process, the purpose of processing it, its retention period and entities that have access to your data;

If you are a user of the PhotoRobot Cloud Service, you have access to your data registered in the Service through your profile created in it.

- the right to rectify personal data which are inaccurate or to have incomplete data completed;
- the right to withdraw at any time the consent to the processing of your data, where the basis for such processing is your consent (Article 6, point 1a of the GDPR provisions); this applies, for example, to withdrawing the consent to receive the newsletter, if you are not using our products and services yet (you are not our client);
- the right to erasure your data (“the right to be forgotten”) if we no longer need it for the purpose for which we received it (once this purpose have been achieved) or if you have withdrawn the consent to the processing of your data (where the basis for such processing was your consent);

In some cases, the obligation to store your data due to law or on the basis of the legitimate interest of the controller may prevent your request from being met.

- the right to demand that data processing be restricted to the storage of data without any further processing in the following situations:
 - in case of your contesting the correctness of personal data (the limitation of the processing will then last for a period enabling us to verify the correctness of your data)



- in case of the processing of your data proved to be unlawful and its erasure was impossible due to your objection,
- in case of your personal data became unnecessary for us and were needed by you in order to establish, assert or defend any of your rights;
- the right to data portability; you have the right to receive from us your personal data in a machine-readable format; or you may request that we transmit your personal data directly to another controller;
- the right to object to the processing of your personal data by us on the basis of the legitimate interest of the controller, such as the right to object to the marketing newsletter being sent to you as our customer.

You can unsubscribe from receiving the marketing newsletter at any time by clicking on the unsubscribe button in the email with the newsletter you received.

- the right to lodge a complaint with the data protection supervisory authority in a given country, if in your opinion we do not comply with the GDPR regulations.

If you wish to exercise these rights, or explain the content and scope of all rights under GDPR, please write to us (to an e-mail or postal address) or call us. Our contact details can be found at the bottom of this Privacy Policy.



How the company communicates with customers

Our company only communicates with you in the manner in which you have given your consent and only to the address (especially e-mail address) or telephone number provided by you for this purpose.

Changes to the Privacy Policy

We reserve the right to modify this Privacy Policy in order to adapt it to possible changes in data protection legislation or changes in the scope of data processed by us.



Information about our company

company name:

improtech s.r.o.

the address of the head office:

U Vysočanského pivovaru 701/3
190 00 Praha 9 - Vysočany
Czech Republic

identification numbers:

CIN: 27367762

TIN: CZ27367762

The company is registered in the Municipal Court in Prague, Czech republic,
under the number C 108825/MSPH.

contact details:

e-mail: info@photorobot.com

www.photorobot.com