

Personal Data Processing Declaration

Personal Data Controller and the Issuer of this Declaration.

Vocalls Inc s.r.o.

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Company Registration Number: 064 13 421

e-mail: info@vocalls.cz entered in the Commercial Register administered by the Municipal Court in Prague, Section C, file number 281723 (hereinafter referred to as "Vocalls" or "the Controller")

Introductory Information

The objective of this Declaration is to inform the users of our services about their rights related to the processing of personal data and about our principles related to the safe processing and protection of personal data provided by users. This Declaration has been drawn up in compliance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016, the General Data Protection Regulation (hereinafter referred to as "the Regulation"), which came into force and effect on 25th May 2018. Vocalls reserves the right at any time to change or amend the Declaration, even without prior notice.

I.

Identity of the Personal Data Controller

Vocalls provides the services of an automatized call center and related services through the web application www.vocalls.cz to legal persons or natural persons – entrepreneurs (hereinafter referred to as "the Client") and this activity requires the processing of personal data. This Declaration has been drawn up in compliance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016, the General Data Protection Regulation (hereinafter referred to as "the Regulation"), which came into force and effect on 25th May 2018 and also in compliance with Act no. 110/2019 Coll., Act on Personal Data Processing.

Vocalls processes personal data as a controller, in the case of its clients, or as a processor for another personal data controller, if it concerns the personal data of the end customers of the clients of Vocalls. If the Client enters personal data in the form of customer contact information into the web application www.vocalls.cz, Vocalls becomes the processor of personal data disclosed in this manner. Vocalls is not responsible for the correctness of the personal data stored in the Client's user account on the web application www.vocalls.cz, nor for the lawfulness and legitimacy of the Client's processing – this responsibility always lies with the Client of Vocalls.

Vocalls has concluded contracts on personal data processing with its clients in relation to whom it acts as a processor which define the manners and purposes of possible processing of disclosed personal data of the Client's end customers. Vocalls is not authorized to modify or process personal data held by the Clients in violation of a concluded contract. Vocalls places maximum possible emphasis on securing personal data, which includes their protection using technical and organizational measures against unauthorized or unlawful processing, accidental loss, abuse or damage.

Vocalls may process personal data of Clients and their end customers through its collaborators or third persons with whom Vocalls concluded contracts on personal data processing and who provided sufficient warranties for the implementation of suitable technical and organizational measures to ensure that such processing meet the requirements of the Regulation and who pledged to preserve confidentiality.

Vocalls uses IT technologies to provide its services – data centers and telecommunication operators located in the territory of the European Union.

II.

Overview of Terms

“personal data” is taken to mean all and any information about an identified or identifiable natural person;

“processing” is taken to mean any operation or set of operations involving personal data, such as collection, recording, organizing, structuring, storage, adjustment or altering, searching, viewing, using, making accessible by transfer, transfer or any other disclosure, ordering or combining, limitation, deletion or destruction;

“controller” is taken to mean a subject that determines the purposes and means of personal data processing;

“processor is taken to mean the subject that processes personal data for a controller;

“services” are taken to mean the services of the automatized call center provided by Vocall through the web application www.vocalls.cz, including related services;

“the Client” is taken to mean a legal person or a natural person – entrepreneur, who has ordered the provision of services from Vocalls;

“end customer” is taken to mean a person whose personal data were stored by the Client on his user account in the web application Vocalls and who has designated it as the recipient of the individual campaigns within the ordered services.

Personal Data Processing by Vocalls

The following part deals only with the processing of personal data carried out by Vocalls from the position of the controller of this data. In cases where Vocalls acts in the role of a processor, the scope and manner of the processing of personal data is determined by the contract on personal data protection concluded between Vocalls and the controller of the respective data.

I.

Personal Data Categories

Vocalls requests from its clients only such personal information that is necessary for the ordering and provision of services and for compliance with legislative requirements.

It concerns in particular personal data in the following scope:

- Identification data (name, surname);
- contact information (phone number, e-mail address);
- **Audio recordings containing voice;**
- IP address of the device which was used to log into the web application Vocalls;
- Information on the use of services;
- Information from publicly accessible records and registers.

II.

Purpose of Personal Data Processing

Vocalls processes the Client's personal data exclusively for the following purposes:

- Provision of the services of an automatized call center through the web application www.vocalls.cz, including related services;
- **Meeting of legal obligations arising from the legal regulations;**
- **Protection of the rights of Vocalls and of its interests protected by the law;**
- **Offering own products and services;**
- **In the scope of the consent given by the Client with the processing of personal data.**

III.

Legal Grounds for Personal Data Processing

Vocalls processes personal data of its Clients based on the following legal grounds:

- **Processing that does not require the Client's consent**

The provision of personal data is voluntary, but at the same time necessary for ordering and provision of services on the part of Vocalls.

- *processing based on the title of meeting of contractual obligations*

Vocalls processes personal data of its Clients based on the title of meeting contractual obligations, including but not limited to the stage of pre-contractual negotiations. If the person is interested in using the services provided by Vocalls, s/he shall fill in their personal data in the web application www.vocalls.cz and set up a user account. All and any administration and ordering of services is carried out through this account

- *Processing based on the title of meeting a lawful obligation*

Vocalls shall abide by all regulatory requirements and obligation defined by legal regulations (in particular by the act on electronic communications, act on accounting, act on value-added tax etc.) and archive for the determined period of time receipts and related documentation. For the purpose of preserving the legitimacy and integrity of such receipts, such documents may contain Clients' personal data.

- *Processing based on the title of a justified interest of the Controller*

The following situations in particular represent a justified interest of Vocalls:

- defending the lawful claims of Vocalls;
- handover of personal data to processors;
- processing of electronic communication including phone call recordings;
- investigation of criminal activity.

The processing of Clients' personal data may, with regard to the requirements arising from legal regulations, continue for up to 10 years after the origin or the termination of the contractual relationship. In this respect, Vocalls does not store or process any personal data in excess of the framework set forth by legal regulations.

- Processing with the Client's consent
 - *handover of Client's personal data to other entities;*
 - *processing of personal data through cookies.* Information on this manner of personal data processing is contained in a separate file labelled Cookies and stored at: <https://www.vocalls.cz/Content/Downloads/cookies.pdf>
 - The Client has the right at any time to revoke their consent. In order to revoke consent, an email must be sent from the Client's authorized email address to the address info@vocalls.cz. After the receipt of the email, the request will be verified by Vocalls. The revocation of consent does not affect the lawfulness of processing arising from the consent granted prior to its revocation.

III.

Client's Rights under the Regulation

In compliance with the Regulation, Vocalls guarantees the following rights for its Clients:

- **Right to be informed and the right to access personal data (Article 13 – 15 of the Regulation)**

The Client of Vocalls has the right to information regarding the purpose of processing, categories of affected personal data, recipients of personal data, the period for which personal data will be stored and regarding their rights. Personal data is entered into the web application www.vocalls.cz by the Client themselves, and s/he can also edit it in the application, and s/he will find the data stored in the user profile after login to the website www.vocalls.cz. The first copy of the processed information will be provided by Vocalls free of charge, repeated requests will carry a charge appropriate to the actual costs of making that copy.

- Right to rectification of personal data (Article 16 of the Regulation)

The Client of Vocalls has the right to a rectification of incorrect personal data and/or to the completion of incomplete personal data. This rectification or completion shall be carried out by the Client themselves in the settings of their user account upon login into the Vocalls web application.

- Right to erasure (Article 17 of the Regulation)

The Client of Vocalls has the right to have their personal data erased by the Controller provided at least one of the following assumptions has been met:

- *the personal data is no longer necessary for the purposes for which it was processed;*
- *The Client has revoked their consent with the processing of their personal data and there is no other lawful reason for the processing of said personal data;*
- *The client has successfully raised an objection against the processing of personal data (Article 21 of the Regulation);*
- *The Client's personal data has been processed unlawfully.*

- Right to restriction of processing (Article 18 of the Regulation)

The Client of Vocalls has the right to have the Controller restrict processing in cases where:

- *The client denies the accuracy of personal data, for a period necessary for the Controller to verify the accuracy of the data;*
- *Processing is unlawful and the Client refuses to have the data erased;*
- *The Controller no longer needs to process personal data, but the Client has requested that the data be processed in order to protect their justified interests.*

- Right to data portability (Article 20 of the Regulation)

If Vocalls processes the personal data of Clients based on their consent or for the purpose of meeting contractual obligations, and if such processing is carried out in an automatized manner, the Client has the right to request that the Controller hand over the processed information in a structured, commonly used and machine readable format to another controller.

- Right to object against personal data processing (Article 21 of the Regulation)

The Client of Vocalls has the right to raise an objection against the processing of their personal data if such data is being processed for the purpose of protecting the justified interests of the Controller. Despite the objection, Vocalls is authorized to process the Client's personal data if serious justified reasons justify it to do so.

- Right not to be subject of automatized decision-making (Article 22 of the Regulation)
- Right to file a complaint or another objection to a supervisory authority

The Client of Vocalls has the right at any time to turn to the supervisory authority, which in the case of the Czech Republic means the Office for Personal Data Protection, registered office pplk. Sochora 27, 170 00 Prague 7, phone number +420 234 665 111, website www.uoou.cz.

In order to exercise the above rights, an email must be sent containing a specific request from an authorized email address of the Client to the address info@vocalls.cz. After receipt of the email Vocalls will verify the request. Vocalls reserves the right to settle the Client's complaint/request within one month of its receipt, and this deadline may be extended for reasons determined by the legal regulation. If the Client has not requested a different manner of the provision of information, Vocalls will provide the requested information in electronic form.