



# PRINCIPLES OF PERSONAL DATA PROCESSING



**of the company Solverae s.r.o., ID: 23933721,**

with registered office at Ve Smečkách 595/28, Nové Město, 110 00 Prague 1,  
registered in the Commercial Register administered by Municipal Court in Prague  
under no. C 435425





## 1 OPENING PROVISION

The protection of personal data is a priority for us. We have developed this Privacy Policy to inform you, our customers and suppliers, about how Solverae s.r.o. (hereinafter also referred to as "**we**" or "**the Company**") obtains, stores, protects, and further processes your personal data in connection with the sale of our products and the provision of related services, as well as in connection with the purchase of products and services from our suppliers.

The processing of your personal data is necessary for the proper fulfillment of our contractual obligations and for the protection of our legitimate interests, as well as for the fulfillment of our legal obligations.

Through this Privacy Policy, we want to provide you with information about how we process your personal data (sections 3 to 7 below) and about your rights and how you can exercise them (section 8 below).

Personal data is any information relating to an identified or identifiable natural person, in particular our customers and suppliers and other persons whose personal data we may process in connection with the provision of our products and services or in connection with the purchase of products and services from our suppliers.

We recommend that you carefully review this Privacy Policy. If you have any questions, please feel free to contact us at any time using the contact details below.

## 2 PERSONAL DATA CONTROLLER AND CONTACT DETAILS

The controller of your personal data is Solverae s.r.o., with its registered office at Ve Smečkách 595/28, Nové Město, 110 00 Prague 1, registered in the Commercial Register maintained by the Municipal Court in Prague, file no. C 435425, ID no.: 239 33 721.

The contact details of the Data Controller for any matters relating to personal data protection are:

Address: Solverae s.r.o., Ve Smečkách 595/28, Nové Město, 110 00 Prague 1

Phone: +420 608 523 661

Email address: [info@recoveraccount.eu](mailto:info@recoveraccount.eu)

Please note that we may change this contact information in the future. You can always find the current contact information in the Personal Data Processing Policy. The current Personal Data Processing Policy is available on our Company's website.

## 3 PROCESSING OF PERSONAL DATA WHEN PROVIDING SERVICES

- 3.1 In order to provide you with our services, we need to know and further process some of your personal data. We process personal data primarily for the purpose of concluding (including negotiations prior to concluding a contract) and fulfilling a contractual relationship, and the legal basis for such processing is the fulfillment of the contract or our legitimate interest. Legitimate interest is the legal basis for processing, especially in cases where the customer is a legal entity and we process the personal data of its contact persons.

- 3.2 **Purpose of the processing.** We process your personal data primarily for the purpose of providing products and services and managing our customer relationship with you. We also process some of the data we have about you after the termination of the contract. Specifically, we process personal data for the following purposes:

- 3.2.1 **Sale of services.** We process personal data when selling our services to clients. For these purposes, we process your personal data on the legal basis of contract performance and/or





our legitimate interest (especially if you are dealing with us as an employee, representative, or other authorized person of a customer and we therefore have no contractual relationship with you). For this purpose, we store your personal data for the duration of the contractual relationship or for the time necessary to fulfill the contractual obligations arising from the relevant contract.

**3.2.2 Complaints.** If the client believes that the performance of our Company is defective, they are entitled to complain about the service in accordance with the relevant provisions of civil law. The handling of complaints is part of the contractual performance between the Company and you and is also our legal obligation.

**3.2.3 Determination, exercise, and defense of legal claims.** After the termination of the contractual relationship, we may also retain some of your personal data for the duration of the limitation periods, the processing of which is necessary to protect our rights and, if necessary, defend legal claims, including the recovery of outstanding payments.

**3.2.4 Accounting and tax documents.** Some personal data may be included in accounting documents (i.e., invoices in particular). Under applicable law (e.g., the Accounting Act or the Value Added Tax Act), we are required to retain these documents for up to 10 years. If we have a legal obligation to archive these documents, we also store your personal data contained in the relevant tax document.

**3.3 Scope of processed data.** For the above purposes, we process personal data that you provide to us within the framework of a contractual agreement. This includes, in particular, the following data:

- identification data (in particular, first name, last name, title, date of birth, and residential address, ID number, bank account number);
- contact details (your email address, phone number, and account name(s));
- photographs and/or video recordings, if applicable.

**3.4 Sources of personal data.** We process personal data that you provide to us in connection with negotiations on the conclusion of a contractual or other legal relationship and its course. We may further verify and/or directly obtain certain personal data from publicly accessible registers, lists, and records (e.g., the Commercial Register, Trade Register, Central Register of Enforcement Proceedings, Insolvency Register, etc.).

**3.5 Retention period.** Unless a longer retention period is required by law, we will retain your personal data for the duration of the contract and, based on our legitimate interest, until the expiry of the limitation periods for asserting claims under the contract (if the legal dispute continues after the expiry of the limitation periods, the data will be retained until the dispute is completely resolved).

## **4 ADDITIONAL SERVICES AND OTHER OPERATIONS**

We may also provide you with the following services, which also involve the processing of personal data, for the period specified below, for the purposes specified below, and on the basis of the legal grounds specified below:

### **4.1 CUSTOMER SERVICE LINE**

**4.1.1** If you contact us via one of our telephone lines where calls are recorded, we will notify you at the beginning of the call that the call may be recorded.

**4.1.2 Purpose of processing.** We usually record telephone communications and then systematically store them so that the recordings can be used to verify the correct understanding of the will of the parties conducting the call (especially when placing orders





by telephone) and to prove the fulfillment of our obligations. The recordings may also be used to protect our rights, especially in any court or administrative proceedings.

- 4.1.3 **Scope of data processed.** Customer service lines do not process any personal data other than data related to the provision of services (see Chapter 3) or operational data necessary to ensure the operation of these lines (including any recordings).

If you contact us through one of our customer service lines, your data may be made available to certain employees of our Company who will contact you to the extent necessary, in particular in connection with the resolution of your request or order.

- 4.1.4 **Retention period.** We retain recordings for a period of 3 months, but if the recording contains legal actions aimed at changing or terminating a contract with our Company, we may in some cases retain it for the duration of the contract and for the duration of the limitation periods.

## 4.2 MARKETING COMMUNICATION

- 4.2.1 If you give us your consent, we will continue to use your personal data for the purpose of sending you news about our services and other commercial communications related to our services. This mainly concerns news about our services that may be relevant to you. We may send news via your contact details. The legal basis for such processing is your consent or our legitimate interest in informing our customers about news within the Company or delivering related commercial communications. If you withdraw your consent to this processing or object to processing based on legitimate interest, we will immediately stop processing your personal data for the purpose of sending marketing communications.

- 4.2.2 **Scope of processed data.** In order to send you relevant marketing communications, we primarily use the following personal data:

- identification data (first name, last name);
- contact details (mailing address, email address);
- data about your orders. údaje o vašich objednávkách.

- 4.2.3 **Processing period.** We process data for this purpose for the duration of your consent or until you withdraw your consent.

## 4.3 ORGANIZING PROMOTIONAL EVENTS

- 4.3.1 We may offer certain customers or their contact persons or other authorized persons the opportunity to participate in a promotional event. In such cases, a contract is formed between our Company and the person participating in the promotional event, and the reason for processing is the performance of the contract, even if such a contract is not concluded in writing.

The organization of promotional events may also include arranging accommodation, transportation, insurance, and other related services. In connection with this, data may be transferred to third parties, such as insurance companies, accommodation facilities, carriers, companies on whose premises the promotional event is held, etc.

- 4.3.2 **Purpose of processing.** The purpose of processing is to properly organize the promotional event.

- 4.3.3 **Scope of processed data.** Various personal data may be processed as part of the promotion, in particular:





- identification data (in particular, first name, last name, title, date of birth, residential address, and company ID number);
- contact details (your email address and phone number);
- customer preference data (e.g., regarding meals or transportation, including health restrictions);
- travel document data.

4.3.4 **Doba uchování.** We retain data for this purpose until the end of the promotional event. In exceptional cases, we may retain data for longer based on our legitimate interests (for example, if an insured event occurs during the tour), up to the expiry of the limitation periods. pro tento účel uchováváme do ukončení pořádání promo akce.

## 5 PURCHASE OF GOODS OR SERVICES

5.1 If you are our supplier from whom we purchase goods or services (or an employee or other contact person of our supplier or other contractual partner), we need to know and further process your personal data in order to fulfill our contractual obligations and ensure effective communication between the contracting parties.

The legal basis for such processing is the fulfillment of contractual obligations, or our legitimate interest (especially if you are dealing with us as an employee or other contact person of the supplier), or the fulfillment of our legal obligations.

We process the personal data you provide to us in connection with negotiations on the conclusion of a contractual or other legal relationship and its course. We may further verify and/or directly obtain certain personal data from publicly accessible registers, lists, and records (e.g., the Commercial Register, Trade Register, Central Register of Enforcement Proceedings, Insolvency Register, etc.).

5.2 **Purpose of processing.** We process our suppliers' data for the following purposes:

- fulfillment of contractual obligations, including negotiations prior to the conclusion of a contract, which includes the processing of data necessary for the appropriate selection of a supplier, as well as the maintenance of records of suppliers and subsequent complaints about goods or services;
- ensuring occupational health and safety (if you provide us with services or other performance for which we have legal obligations to ensure occupational health and safety, we may also process your personal data for the purpose of fulfilling, checking, and proving compliance with these obligations);
- publication in accordance with personal data protection regulations (If you are also a processor of our personal data, we are entitled to publish your personal data in this Personal Data Processing Policy.);
- retention of accounting and tax documents (Some personal data may be included in accounting documents. Under applicable law (e.g., the Accounting Act or the Value Added Tax Act), we are required to retain these documents for up to 10 years.);
- determination, exercise, and defense of our legal claims (After the termination of the supplier relationship with you, we may retain some of your personal data, the processing of which is necessary to protect our rights and defend any legal claims, including the recovery of unpaid payments.).





5.3 **Scope of processed data.** We only process personal data that is necessary to fulfill the above purposes and that we obtain through the above sources. This mainly includes the following data:

- contact details (your email address and phone number);
- purchase and payment history, including related data;
- certificates, authorizations, attestations, qualification data, etc.

5.4 **Retention period.** Unless a longer retention period is required by law, we will retain personal data for the duration of the contract with the supplier and, based on our legitimate interest, until the expiry of the limitation periods for asserting claims under the contract (if the legal dispute continues after the expiry of the limitation periods, the data will be retained until the dispute is completely resolved).

## 6 SHARING AND TRANSFER OF PERSONAL DATA (RECIPIENTS OF PERSONAL DATA)

### 6.1 Recipients of personal data

We may share the personal data we process in the ways described above with third parties who provide certain services related to the sale of our products and the provision of our services, in particular administrative support, the provision of software tools, etc. These parties are in the position of personal data processors. We may share your personal data in particular with:

- with the operator of the social network on which your account has been blocked;
- some of your personal data may also be accessed by suppliers of our IT systems and related services, i.e. hosting providers and payment service providers;
- in some cases, external auditors, tax advisors, legal representatives may have access to some of your personal data if this is necessary for the enforcement or accounting of claims or for the protection of our legitimate interests, or insurance companies in the event of insurance claims;
- If public authorities contact us in the exercise of their powers with a request for information, which may include your personal data, we will be obliged to disclose your personal data to the extent necessary on the basis of our obligations under the law or other legal act.

### 6.2 Processing guarantees

We have entered into personal data processing agreements with personal data processors that guarantee at least the same level of protection for your personal data as this Personal Data Processing Policy.

## 7 DATA SECURITY

We have implemented and maintain the necessary technical and organizational measures, internal controls, and information security processes in accordance with best business practices appropriate to the potential risk to you as a data subject. At the same time, we take into account the state of technological development in order to protect your personal data from accidental loss, destruction, alteration, unauthorized disclosure, or access. These measures may include, among other things, measures to ensure physical security, taking appropriate steps to ensure the accountability of employees who have access to your data, employee training, regular backups,





data recovery and incident management procedures, software protection for devices on which personal data is stored, and other measures.

## **8 YOUR RIGHTS AS A DATA SUBJECT**

In accordance with applicable law, you have the right to request information about how your personal data is processed and the right to correct data that we process about you as a personal data controller. In certain cases, you have the right to request the deletion of your personal data, and you also have the right to access your personal data or transfer it (e.g., transfer to another service provider). In some cases, you have the right to object and also the right to request the restriction of the processing of your personal data. If you have previously given us your consent to the processing of personal data, you can revoke it at any time. The individual rights and how to exercise them are described in more detail below.

### **8.1 How to exercise your rights**

If you exercise any of your rights under this article or under applicable law, we will inform each recipient to whom the data has been disclosed in accordance with Chapter 6 of this Privacy Policy of the action taken or the deletion of personal data or the restriction of processing, in accordance with your request, if such communication is possible and/or does not require disproportionate effort.

If you wish to exercise your rights and/or obtain relevant information, you may do so using the contact details provided in Chapter 2 of this Personal Data Processing Policy.

If you exercise your rights, we may ask you to provide certain additional personal data that you have previously provided to us. The provision of such data is necessary to verify that the request was actually sent by you. We will respond to you within one month of receiving your request, but we reserve the right to extend this period by a further two months in complex cases.

### **8.2 Correction of your personal data**

Under applicable law, you have the right to correct your personal data that you share with us. If you wish to request a correction of your personal data, please contact us using the contact details provided in Section 2 of this Privacy Policy.

We take reasonable measures to ensure that you can keep your personal data accurate and up to date. You can always contact us to ask whether we are still processing your personal data.

### **8.3 Deletion of your personal data**

You may request us to delete your personal data at any time using the contact details provided in Section 2 of this Privacy Policy.

If you contact us with such a request, we will delete all your personal data that we have without undue delay, unless we still need your personal data to fulfill contractual or legal obligations or to protect our legitimate interests as described above. We will also delete (and ensure deletion by the processors we engage) all your personal data if you withdraw your consent to the processing of data, if you have previously given us your consent.

### **8.4 Withdrawal of consent**

You may withdraw your consent to the processing of personal data that you have previously provided to us at any time without giving any reason. You can do so by using the contact details provided in Article 2 of this Privacy Policy.

Please note that withdrawing your consent does not affect the lawfulness of any processing carried out on the basis of your consent prior to its withdrawal.







## 8.5 Accessibility and portability of your personal data

You have the right to request information about whether we process your personal data and to what extent. You also have the right to request that we provide you with access to the personal data you have provided to us and other personal data relating to you. If you wish to confirm the scope of the data we process about you or obtain a copy of it, please contact us using the contact details provided in Section 2 of this Privacy Policy.

If you request the transfer of your personal data that we process on the basis of the performance of a contract and/or your consent, you may ask us to transfer it directly to a third party (another data controller) specified in your request, provided that such a request does not adversely affect the rights and freedoms of others and is technically feasible.

## 8.6 Right to object

If we process your personal data on the basis of our legitimate interest (e.g. if we process your data as a contact person of our customer), you have the right to object to such processing at any time for reasons relating to your particular situation. In such a case, unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or unless we demonstrate that the data is necessary for the establishment, exercise, or defense of our legal claims, we will no longer process the data and will delete it without undue delay. If you object to the processing of your personal data for direct marketing purposes, we will immediately stop processing your data for this purpose.

You can raise objections to processing via the contact details provided in Chapter 2 of this Personal Data Processing Policy.

## 8.7 Restriction of processing

If you request us to restrict the processing of your personal data, e.g. if you contest the accuracy, lawfulness, or our need to process your personal data, we will restrict the processing of your personal data to the minimum necessary (storage) and, where applicable, we will only process it for the establishment, exercise, or defense of legal claims, or for the protection of the rights of another natural or legal person, or for other limited reasons prescribed by applicable law. If the restriction is lifted and we continue to process your personal data, we will inform you without undue delay.

You can submit a request for restriction of processing using the contact details provided in Chapter 2 of this Personal Data Processing Policy.

## 8.8 Complaint to the Office for Personal Data Protection

You have the right to file a complaint regarding our processing of your personal data with the Office for Personal Data Protection, Pplk. Sochora 27, 170 00 Prague 7. The office's website is [www.uoou.cz](http://www.uoou.cz).

## 9 UPDATE OF THE PERSONAL DATA PROCESSING POLICY

We may amend or update this Privacy Policy from time to time.

This Personal Data Processing Policy takes effect on November 6, 2025.

In Prague on 6. 11. 2025

**Solverae s.r.o.**

Daniel Izák, jednatel

