

PRIVACY POLICY

1	Introduction	2
2	Data controller and contact details	2
3	Sharpgrid's services – Core data processing activities	2
3.1	Purpose of processing	2
3.2	Scope of data processed	3
3.3	Source of data processed	3
3.4	Regular updates	3
4	Ancillary data processing operations	4
4.1	Purposes of processing.....	4
	Scope of data processed.....	5
4.2	Source of data	5
5	Cookies	5
6	Sharing and transfer of personal data (recipients of personal data).....	5
6.1	Sharing data with customers within SharpGrid's services	5
6.2	Sharing data for ancillary operational purposes	5
6.3	Data transfers outside the EU	6
7	Data security	6
8	Your rights as a data subject	6
8.1	Access to your personal data.....	6
8.2	Withdrawal of consent.....	6
8.3	Rectification of your personal data	7
8.4	Erasure of your personal data	7
8.5	Restriction of processing	7
8.6	Objections to processing	7
8.7	Complaint to a Data Protection Authority	7
9	Updates to the Privacy Policy	7

1 INTRODUCTION

This privacy policy (the “**Privacy Policy**”) is meant to help you understand how SharpGrid s.r.o. (“**SharpGrid**” or “**we**”) collects, uses and processes data from publicly available sources (including some personal information) in order to provide its services.

We collect publicly available information relating to various business entities and their activities, in order to provide a clear and concise picture of their professional activities. While we strive to collect only business and commercial information, the collected set of information may, however, in some instances, include also information that qualify as personal data, for example data relating to legal entity’s representatives or when the business, outlet or establishment is owned or operated by a self-employed individual.

Where we process personal data, we are committed to respecting privacy and personal data protection. The purpose of this Privacy Policy is to inform you how we handle, process, and protect your personal data which we collect from various public sources or from your interaction with us. As used in this Privacy Policy, “personal data” means any information that identifies or may identify an individual, in particular our business partners, their contact persons, and other persons (“**you**”).

In this Privacy Policy you will learn (i) how we collect, process and protect your personal data, (ii) what are your rights as a data subject, how you can exercise them, and what we have done to help you exercise them.

We recommend that you carefully familiarize yourself with this Privacy Policy.

2 DATA CONTROLLER AND CONTACT DETAILS

The controller of your personal data is **SharpGrid s.r.o.**, with its registered office at Pernerova 697/35, Karlín, Praha 8, Czech Republic, Company ID No.: 095 40 385, registered in the Commercial Register maintained by the Municipal Court in Prague, file no. C 337841.

In case of any questions, concerns or other matters regarding the personal data protection, please contact us via the following e-mail address: **legal@sharpgrid.com**

Please note that these contact details may be a subject to future changes. Updated contact details can always be found in this Privacy Policy which is available at sharpgrid.com/privacy-policy.

3 SHARPGRID’S SERVICES – CORE DATA PROCESSING ACTIVITIES

SharpGrid’s products and services are data driven and lie in processing of publicly available business and commercial information. When providing these services, SharpGrid may collect and further process personal data.

3.1 Purpose of processing

We collect publicly available data about businesses to connect pieces of publicly available information shattered and fragmented across the publicly available online sources on the Internet. We pick up and collect the information to provide a clear and concise picture of businesses’ activities as registered in public registers (maintained by the state), advertised, or otherwise published by the businesses and their customers and visitors (such as reviews, recommendations, or endorsements).

We do not and do not intend to use any information or data to target individuals. The purpose of processing the data is to gain transparent knowledge about businesses to provide the public and other businesses with the desired transparency. Our processing activities are bringing wide benefits for the public as well as market players in question. We promote and enhance transparency of business activities in the relevant sectors and markets, including market structure and continuous development thereof. Such transparency and visibility are crucial to engage in business activities

in these sectors. That helps users of our services to utilize and diversify their investments based on objective non-biased data.

By doing so, we avail the transparency of the market in the sectors in question. That brings essential visibility for the market players, investors as well as customers who need to get acquainted with the market and to get a better understanding thereof.

We also use the data to create statistics and aggregated overviews of the sector development, growth, and diversification. The data may also be used retrospectively for a quality control and checks of the accuracy of the data and outcomes based thereon. For these purposes, we may store some source data on key business indicators based on which it follows the sector trends and creates aggregated overviews.

The legal basis for the processing of your personal data for this purpose is our legitimate interest. We have conducted and regularly review a legitimate interest assessment to ensure that the processing does not infringe your rights and freedoms.

3.2 Scope of data processed

We primarily collect information relating to businesses and their commercial activities (typically in the segment of gastronomy, retail, and beauty outlets). Although not primarily intended, this set of data may ultimately involve also some personal data. If any personal data are collected, they usually represent contact details of the business operator (if the business is operated by a natural person) or business' representatives (e.g., contact persons).

The scope of personal data that may be collected for this purpose corresponds to the following: name, business email address, business phone number, business social media accounts or websites that we collect from the public online profiles of a particular business, outlet or establishment.

Neither special categories of personal data nor any other specific set of data which might invade data subjects' privacy are processed.

3.3 Source of data processed

All data are collected from publicly available sources where they can be obtained by anyone. We only collect these publicly available data about businesses in order to connect pieces of publicly available information shattered and fragmented across the publicly available online sources on the Internet.

We use approx. twenty (20) internet sources to extract data, including public registers maintained by the state. The sources of data include, but are not limited to, the following categories:

- Official public (government) registers
- Local business online directories
- Map services such as [Google Places](#), [Openstreetmap.org](#)
- Social media sources such as [Facebook](#)
- Local and international restaurants portals such as [Restu.cz](#), [Zomato](#), [Ceskehospudky.cz](#) or [pyszne.pl](#)
- Travel portals such as [Tripadvisor](#) or [Viamichelin](#).

3.4 Regular updates

The data obtained from publicly available sources are updated on a regular basis (but no less than quarterly). By routinely updating the data, we ensure that its database and all the data are up to date and synchronized with all the publicly available data sources it uses.

The customers are always provided with the latest version of the processed data. It is our policy and dedication to have data as accurate and up-to-date as feasible. We therefore strive to enhance our techniques to have cutting-edge technologies ensuring that the data we process are up to date.

4 ANCILLARY DATA PROCESSING OPERATIONS

We may further process personal data for **other purposes that are not tied up to our [core services](#)** (as described in Chapter 3 above), however, directly relate to our business activities and communication with our customers, vendors or other persons. We particularly process personal data (scope of which is defined below) for the following purposes:

4.1 Purposes of processing

4.1.1 Fulfilment of contractual obligations. If you or your company or organization entered into an agreement with us, we may process your personal data for the purpose of performance of the agreement and fulfilment of our contractual obligations under the agreement. That also covers scenarios when your employer (our customer) provides us with your email to give you access to our services and tools

The legal basis for such processing is the performance of the contract for which the personal data are necessary and/or related legitimate interest to store such data. The retention period for the processing of the personal data will correspond to the duration of the contractual relationship.

4.1.2 Effective communication. We also process your personal data for the purpose of ensuring effective communication between you and us, as well as for the purpose of ensuring effective administration of our contractual relationship, if applicable.

For this purpose, your personal data are processed on the basis of our legitimate interest. The personal data necessary for this purpose is retained primarily for the period of the duration of our relationship.

4.1.3 Fulfilment of statutory obligations. Some personal data may be included in documents that we are required to store under applicable legislation, in particular with respect to accounting (e.g. Accounting Act, VAT Act).

For this purpose, your personal data are processed on the basis of our legal obligation. The duration of the period for which we will process your personal data is set out by the relevant legislation; in principle, the retention period will not exceed the period of 10 years from the collection of the personal data.

4.1.4 Determination, exercise and defense of our legal claims. Following the termination of our contractual relationship, if applicable, we may continue to process the personal data that are necessary for the protection of our rights and for the potential defense of our legal claims, including collection of outstanding payments.

For this purpose, your personal data, will be processed on the basis of our legitimate interest, and for a period of time in which the relevant legal claims may can be pursued under applicable law.

4.1.5 Our marketing activities. In the course of our contractual relationship and/or if you give us your consent (such as to receive our newsletters), we may contact you to inform you about the SharpGrid news, services, features, and special offers and to invite you to our events that we believe may be of interest to you. For that purpose, we process your data on the basis of your consent or our legitimate interest, as applicable, including the provision of marketing communication within the limits prescribed by law.

The processing will be limited to the duration of our contractual relationship, unless you grant us your consent to receive our marketing communication in which case your personal data will be processed for the duration of your consent, not exceeding the period of 3 years.

Your marketing communication preferences may be changed at any time. If you would like to unsubscribe from an email sent to you, please follow the "unsubscribe" link and/or instructions placed at the foot of every SharpGrid email.

Scope of data processed

If you or your company have entered into a contractual relationship with us, we process the personal data necessary for the **conclusion of the contract** and for the **effective communication** with you, namely your and your company's identification and contact details, payment information, the content of the communication and other information you may have shared with us for the purpose of the performance of the contract.

If we are required to retain some personal data for **statutory purposes**, the scope of personal data will be limited to the content of the respective documents and will mostly contain only identification and contact details and payment-related information.

The scope of that processed for the purpose of **determination, exercise and defense of our legal claims** will be limited to the information we processed during our contractual relationship.

In regard to our **marketing activities**, we will only process your business contact details given to us, namely your name, surname, email address, phone number and company.

4.2 Source of data

For all other purposes of processing set out in Section 4.1 above, we obtain the personal data directly from data subject, in particular in the course of the contractual relationship.

5 COOKIES

We use cookies and other technologies (such as site measuring software and user experience software) to enhance your online experience and learn about how you use our services in order to improve the quality of the services. We may combine data gained through cookies with other data you provide to us.

Further information relating to the use of cookies is available at sharpgrid.com/cookies-policy.

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

6.1 Sharing data with customers within [SharpGrid's services](#)

Your personal data may be primarily shared with our customers who use [our services](#) to obtain transparent and up-to-date information from publicly available sources about relevant business markets. The customers are always provided with the latest version of the processed data and the scope of personal data transferred to the customers is limited to a minimum. The customers are provided only with such set of data which they could collect from the Internet themselves; there are no data (all the more not so personal data) which would not be publicly available at the moment of collection.

6.2 Sharing data for ancillary operational purposes

To ensure our business operations we may process your personal data for some [ancillary operations](#). For those reasons, your data may be further shared (to the extent applicable, without limitations) with:

- companies of the group which SharpGrid is a member of, i.e.: BizMachine s.r.o. (Company ID No.: 05450641)

- service providers and external auditors, consultants, tax advisors and legal representatives bound by confidentiality obligation, ie.: Clever Maps, a.s. (Company ID No.: 03728277)
- public prosecution bodies, courts, and administrative authorities in accordance with our legal duties.

Where applicable, we have entered into data protection agreements with our processors to ensure adequate protection of your personal data.

6.3 Data transfers outside the EU

Should your data be transferred outside the European Union or European Economic Area, all data transfers are conducted in accordance with Chapter V. of GDPR — in particular, in accordance with adequacy decisions issued by the European Commission and standard contractual clauses (Model Clauses) supplemented by appropriate safeguards, as deemed necessary given the nature of the personal data processed.

7 DATA SECURITY

We have implemented and maintain appropriate technical and organizational measures, internal controls and information security processes in accordance with legal requirements and market standards corresponding to a possible threat to you as the data subject. We also take into consideration the state of technological development in order to protect your personal data from accidental loss, destruction, alterations, unauthorized disclosure or access. Such measures may, among other things, include taking reasonable steps to ensure the liability of relevant employees who have access to your data, training of employees, regular backups, procedures for data renewal and management of incidents, software protection for devices on which personal data are stored, etc.

8 YOUR RIGHTS AS A DATA SUBJECT

If you wish to exercise any of your rights according to this Section or according to applicable legislation, please contact us using the contact information listed in Section 2 above.

Also, if applicable, we will inform each recipient to whom your data have been provided according to Section 7 of this Privacy Policy of the measures taken or of the erasure of your personal data or of the restriction of processing in accordance with your request, if such a notification is possible and/or does not involve disproportionate effort.

8.1 Access to your personal data

You have the right to obtain confirmation as to what personal data we process or do not process with respect to you.

You can access your personal data via contact details.

8.2 Withdrawal of consent

Granted consent to the processing of your personal data can be withdrawn at any time without giving reason. For such purpose, please contact us via the contact details set out in Section 2 of this Privacy Policy. In such a case, we will erase your personal data within 30 days from the withdrawal of your consent.

When you have given us your consent to marketing communications, you can also withdraw your consent by clicking on subscribe button in a particular email communication (see [Our marketing activities](#)). Please note that the withdrawal of your consent does not affect the lawfulness of processing conducted on the basis of consent prior to its withdrawal.

8.3 Rectification of your personal data

According to applicable legislation, you have the right to rectification of your personal data that we are processing if you find that they are inaccurate or incomplete.

To request rectification of your personal data, please contact us via the aforementioned contact details.

8.4 Erasure of your personal data

You can request erasure of your personal data at any time. The scope within which we can comply with your request for erasure of personal data may be limited by our statutory obligations to store some personal data, particularly on the basis of accounting and tax regulations, etc. Further, we will also erase all of your personal data (and ensure erasure thereof by the processors that we engage) if you withdraw your consent.

8.5 Restriction of processing

If you request us to restrict the processing of your personal data, for example when you contest the accuracy, lawfulness or our need to process your personal data, we will limit processing of your personal data to a necessary minimum (storage), and if applicable we will only process this data to establish, exercise or defend legal claims or where necessary in order to protect the rights of other natural or legal person, or for other limited reasons required by the applicable law.. In case the restriction is lifted, and we continue processing your personal data, you will be informed accordingly without undue delay.

The request for restriction of processing can be made using the aforementioned contact details.

8.6 Objections to processing

You can object to data processing. If we do not demonstrate any compelling legitimate reasons for the processing which would override your interests or rights and freedoms, we will no longer process your personal data and will delete it without undue delay.

When we use your contacting details for [our direct marketing activities](#), you can also object to such use by clicking on subscribe button in a particular email communication.

Objections to processing can be raised using the aforementioned contact details.

8.7 Complaint to a Data Protection Authority

You have the right to lodge a complaint pertaining to processing of data conducted by us with the competent data protection authority, i.e., in Czech Republic the Office for Personal Data Protection, Pplk. Sochora 27, 170 00 Praha 7; website: www.uoou.cz.

9 UPDATES TO THE PRIVACY POLICY

This Privacy Policy can be a subject of change. Any changes to this Privacy Policy shall become effective with publication of the updated Privacy Policy at SharpGrid's website at sharpgrid.com/privacy-policy. This Privacy Policy was last updated on the 4th February 2021.