



Buggyra Powersports OÜ

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Personal Data Protection Principles

(Valid and effective since 1 January 2020)

Principles of Personal Data Protection

By filling out an order form, registering and subscribing for commercial information provision or browsing through our web site you permit the company Buggyra Powersports OÜ, with registered seat at Harju Maakond, Kesklinna linnaosa, Roosikrantsi tn 2-1119, 10119 Tallinn, Estonia, Company Registration Number: 14788380, V.A.T.ID: EE102217322 (hereinafter "Controller" or "Personal Data Controller") to use your personal data. This site, in compliance with the Regional of the European Parliament and of the Council (EU) no. 2016/679, of 27 April 2016, on the protection of natural persons in connection with the processing of their personal data (GDPR), is to inform you about the type(s) of information collected about you, about the reason(s) and method(s) of our use of your data, about your rights in connection with the personal data used by us and the ways you can apply your rights with us in compliance with GDPR regulation.

What kind of information we collect about you

For the purpose of our order record keeping we process your personal data in the following scope: your e-mail address, full name, phone number, residential address and price data. We need these data in the first place for your order processing, that is for the purpose of our contract implementation. After the contract closing we use personal data from order records for other purposes. It is our legitimate interest to maintain complete order records for the purpose of our legal protection in case of potential future legal disputes. With regard to the legal warranty period throughout which we guarantee goods quality, the statute-barred period and the court system functioning we have to process your data stored in our order records for the period of 6 years. We further use order record data for fulfilment of our legal duty of document archiving for the purpose of potential tax inspection for the period of 10 years.

For the purpose of user record keeping we process your personal data in the scope provided by you for the purpose of your registration or profile amendment in connection with order placement. It is our legitimate interest to keep user database, permitting our individual customers to maintain and manage their profile in the framework of web site registration. In addition to registration purpose, this database is further used by us for personal identification in dealings with the customer centre, for complaint settlement or order management at delivery points or for marketing purpose (for more details see below). We further process collected personal data for marketing purposes. These data are described in detail below. Personal data for the purpose of user record keeping are held for the period of 10 years from your last implemented order.

Your personal data also serve for transport assurance (fulfilment of our contract obligations). We forward these data to haulier companies. For the purpose of potential customer and/or haulier complaints we process these data used for the purpose of transport provision for the period of 10 years from the respective order placement. Saving personal data from your order form permits facilitation of your further purchases and pre-population of your electronic shopping basket with your earlier used data. Personal data processing for the purpose of purchase facilitation is done on the basis of the legal title of legitimate interest and the data are kept in our database together with other data collected about you for the period of 5 years from your last order placement.

To provide you with appropriate technical support for your use of our web site we store technological data of your device used for access to our web site (your browser and operating system and the device used for access to our web site). Technical support provision is both our and your legitimate interest. This information is part of our internal logs and is not used for any purpose other than technical support provision. Despite this the information must be maintained by us for the whole period of life of the personal data processed by us. The latest date of these data erasure is 5 years from your last order placed with us.

How we use data for marketing purposes

Data processed for marketing purposes include your contact data filled out by you in your order placed with us, in the context of your registration or subscription for commercial information delivery, and we use these data for sending commercial information to you and for making this information most relevant to you. We try to make our information entertaining and inspiring to you, that is why we need to know your response to our messages, and to keep your feedback. You can obviously unsubscribe from delivery of our commercial information any time, or change the frequency of its provision, for example in your customer profile. After complete unsubscribing (from all information channels) we will no longer use your contact data for any commercial information delivery to you.

To be able to intermediate a most pleasant customer experience to you and to continuously improve our services we store data helping us find out what in particular you are interested in and what you like most in connection with us. We greatly value your opinion, which is our driving force. That is why we carefully store your feedback received most often through your answers to our questionnaire inquiries. Thus we try to protect us and you against its abuse. Your feedback also enables us to operatively address issues with vouchers with the help of our customer centre.

All personal data used for marketing purposes are used on the basis of the legal title of legitimate interest and we keep your data for marketing purposes for the period of 5 years from your last order placement. As we are well aware that data about what in particular you are interested in, what you like, and your feedback to our commercial messages may be perceived as sensitive data, we only save them for 2 years from the date of their obtaining.

Who we forward your personal data to

Your personal data are used exclusively for our internal need and solely for the above mentioned reasons. However, not all the necessary services connected with personal data processing can be assured by our in-house resources, and that is why we use third-party services (of specialised companies). We have contracts executed with the third parties to whom we provide your personal data, including clauses assuring and protecting your rights in the area of personal data protection.

In the context of your order implementation your personal data may be provided to haulier companies, including but not limited to:

1. DPD CZ s.r.o., with registered offices at Zemská 211/I, Ejpovice
2. Česká pošta s.p., Czech Post, state establishment, with registered offices at Prague 1, Politických vězňů 909/4
3. Outside the order system we process your personal data in third-party information, analytical and marketing systems, in an extent necessary for our business, such as: Ler digital studio s.r.o. – our web site administrator, with registered offices at Platněřská 90/13, Prague 1
4. The Pohoda accounting system operated by STORMWARE s.r.o.

We never forward your personal data to any third party for the purpose of their further processing.

Where we keep your personal data

Your data are saved on backed-up servers of ONEsolution s.r.o., Cejl 82/58, Zábřovice, 602 00 Brno, Czech Republic. The data centre security is in full compliance with GDPR and further information can be found directly on the web site of the data centre. Access to the systems intermediating personal data of our customers is limited to a small number of internal users, on the need-to-know basis. Individual employees can only access a limited volume of personal data necessary for their work.

What rights are provided to data subjects by GDPR and how these rights can be applied with us

Right to access to and correction of personal data

Any time you want in future you can send an e-mail to buggyra@buggyra.com to request our confirmation whether we process your personal data or not. If we do process your personal data we can inform you, on your request, in addition to information provided in our General Business Terms and Conditions, and in addition to these Personal Data Protection Principles and information provided in the document on use of cookies by our web site, about potential third parties to whom your personal data have been or will be made accessible. In the case of your personal data not provided by you, you have the right to any information available to us about where we obtained your personal data from.

If we process inaccurate personal data about you, you can notify us about this fact by sending an e-mail to buggyra@buggyra.com, and we will correct your data without undue delay. Following your registration on our web site you will be able to correct your data yourself, through adjustment of your profile. If you want to add more personal data not previously provided to us, which is necessary for provision of our service to you, just fill it out once again in the relevant section in the context of your profile amendment. By written request addressed to the registered offices of our company you can ask about erasure of your user account and personal data not necessary for further processing purposes.

Right to objection against personal data processing

Even where we process your personal data on the basis of our legitimate interest, you can raise an objection against such processing, including an objection against your personal data processing for the purpose of direct marketing. You can do this by sending an e-mail to buggyra@buggyra.com. After raising such an objection we will assess without undue delay the extent to which we may claim legitimate reasons for your personal data processing in compliance with the law justifying the processing despite the objection raised by you, and how to deal with your personal data in the meantime. We will restrict your personal data processing until we are able to prove you our legitimate reasons for your personal data processing.

Right to restriction of personal data processing

You have the right to ask for restriction of your personal data processing, including their erasure, i.e. for discontinuation of our use of your personal data:

1. If you let us know that your personal data collected by us are inaccurate, until verification of their correctness.
2. In the case of illegal processing of your data, if you ask for restriction of your data processing instead of their erasure by sending an e-mail to buggyra@buggyra.com.
3. If we no longer use your data for our service provision but you may need them for application of your rights.
4. If you raise an objection against your personal data processing pursuant to the previous paragraph, until we verify whether our reasons for processing prevail over your interests.

Right to be forgotten (right to personal data erasure)

If you find out that we process your personal data:

1. Although we no longer need to process them for the purposes for which we obtained them,
2. Although you have raised an objection pursuant to the relevant paragraph above and we have been unable to prove to you justified reasons for their processing, prevailing over your interests, rights and liberties or over execution or defence of legal claims, and/or
3. Illegally,

You have the right to ask that we erase your personal data processed by us, without undue delay after your notification of such facts by sending an e-mail to buggyra@buggyra.com. However, we cannot erase your data, even on your request, if their processing is required for the purpose of execution of the right to liberty of expression and information, for the purpose of fulfilment of our legal duty, or for the purpose of fulfilment of a task performed in public interest, or for the purpose of specification, execution or defence of our legal claims.

Right to data provision in machine readable format

If you ask us by sending an e-mail to buggyra@buggyra.com to provide you the personal data we process about you, we will send them to you in a structured, commonly used machine readable format (such as *.xls, *.csv, or similar). If you request our sending your personal data to another personal data controller, we will certainly cater for your request.

Right to recall consent with commercial information delivery at any time

If in the context of our special events we request your consent with your personal data processing, you can take your consent back any time, without giving the reason. You can take your consent back either in the way described in more detail in the rules of consumer competition, or by sending information about your consent recall to e-mail address buggyra@buggyra.com.

Right to complaint filing with data protection officer

If in your opinion we do not fulfil all our legal obligations connected with your personal data processing, please address us directly. Should we not help you, you can obviously address the data protection officer using the address of the registered offices at: Pplk. Sochora 27, Prague 7, post code 170 00, or e-mail posta@uouu.cz, or any other way acceptable for the data protection officer. For more information about the data protection officer please visit www.uouu.cz.