

DATA PROTECTION

TWIGSEE – PREMIUM PARENT

This privacy policy governs the rights and obligations of the parties involved in the processing of personal data in connection with the use of the ‘**Premium Parent**’ service, which is provided by **Twigsee, s.r.o.**, company registration number: 05694655, with its registered office at Jankovcova 1596/14b, Holešovice, 170 00 Prague 7, registered in the Commercial Register maintained by the Municipal Court in Prague, file no. C 269109 (“Twigsee” or “the Provider”).

This Policy is governed by applicable legislation, in particular Regulation (EU) 2016/679 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, and repealing Directive 95/46/EC (General Data Protection Regulation) (“GDPR”).

For the purposes of personal data protection, the Service Provider named below is the data controller under the GDPR

1. Basic information

Controller: the controller of personal data is **the Provider**, namely **Twigsee, s.r.o.**, Company Registration Number: 05694655, with its registered office at Jankovcova 1596/14b, Holešovice, 170 00 Prague 7, registered in the Commercial Register maintained by the Municipal Court in Prague, file no. C 269109

Contact details of the Controller or Provider: email: helpdesk@twigsee.com / gdrp@twigsee.com, postal address: Jankovcova 1596/14b, Holešovice, 170 00 Prague 7, data box: ykq9sbz

Data Protection Officer: Jan Šindelář, jan.sindelar@mms.cz

Service: provision of access to the Twigsee app features listed on the Website as ‘Premium Parent’ for Users for a period of 12 months

User: a natural person ordering the Services who holds a user account in the Twigsee application

Website: www.twigsee.com

2. Purpose of personal data processing (legal basis)

- 2.1 The Provider, as the Controller, processes personal data for the purposes of the contract for the provision of Services between the Provider and the User, i.e. for the purposes of concluding this contract (ordering the Services) and ensuring the performance of this contract. The Provider also processes personal data in order to protect the Provider's rights and legal claims as a seller and provider of the Service, and to fulfil its accounting and tax obligations in connection with the payment of the price for the Service and the handling of claims or complaints regarding the Service.
- 2.3 The User acknowledges and agrees that the Provider may also use Users' contact details for the purposes of commercial communication, consisting of sending informative messages containing commercial communications relating to the Provider's similar services and products. The User may unsubscribe from such communications at any time by emailing the address provided in the Provider's Contact Details or by clicking the unsubscribe link in an electronic marketing message.
- 2.4 With the User's consent, the Provider may also use the User's contact details for the purposes of commercial communications consisting of sending informative messages containing commercial communications relating to other services and products of the Provider or companies within the Bakaláři group. The User may unsubscribe from these communications at any time by sending an email to the address specified in the Provider's Contact Details or by clicking on the unsubscribe link in an electronic commercial communication.

3. Personal data processed

- 3.1. For the purposes of providing the Service in accordance with Article 2.1 of this Policy, the Provider processes (i) the User's identification details (first name and surname) and contact details (home address, telephone number and email address) and (iii) data relating to payment for the Service.
- 3.2. The User acknowledges and agrees that, upon ordering the Service, the Provider will retrieve all personal data being processed from the Twigsee application via the User's account on that application.
- 3.3. For the Provider's marketing purposes as set out in Article 2 above, the Provider processes the User's email address. An objection to such processing may be lodged via the Provider's contact details.
- 3.4. The Provider processes only the User's personal data provided during the User's registration in the Twigsee application; the Provider does not use any other sources of information about the User.
- 3.5. The Provider does not require the provision of personal data falling within the so-called special categories of personal data under the GDPR and does not process any such data. The Provider processes personal data both automatically within information systems and manually through its employees or the employees of its suppliers listed in Article 4 of this policy.

4. Other data processors and the transfer of personal data

- 4.1. The Provider discloses personal data, to the extent necessary, to its following suppliers, who require the data for (i) the operation of the Services within the Twigsee app and the Website; (ii) the operation of the payment gateway for payment of the Service fee; and (iii) the issuance of invoices using the FAPI automated software:

- a) **Global Payments s.r.o.**, with its registered office at V Olšinách 626/80, Strašnice, 100 00 Prague 10, Czech Republic, Company Registration Number: 042 35 452, registered in the Commercial Register maintained by the Municipal Court in Prague, file no. C 244453 ([GP webpay](#))
 - b) **FAP Business s.r.o.**, with its registered office at F. A. Gerstnera 2151/6, České Budějovice 7, 370 01 České Budějovice, Company Registration Number: 07671563, registered with the Regional Court in České Budějovice, file no. C 31386 ([www.fapi.cz](#))
 - c) **BAKALÁŘI software s.r.o.**, with its registered office at Čs. armády 2, Příbram IV, 261 01 Příbram, Company Registration Number: 27483045, registered and maintained at the Municipal Court in Prague, file no. C 344654 ([www.bakalari.cz](#))
 - d) **SmartSelling a.s.**, with its registered office at Netroufalky 797/5, Bohunice, 625 00 Brno, Company Registration Number: 29210372, registered and maintained by the Regional Court in Brno, file no. B 7559 ([www.smartemailing.cz](#))
 - e) Hosting or cloud service providers listed in Article 4.2 below.
- 4.2. The Provider stores personal data on third-party servers (hosting, including cloud services) with which the Provider has concluded contracts regarding the processing and security of personal data. The Provider has taken appropriate technical and organisational measures to protect personal data against unauthorised access.

Hosting providers:

Microsoft Ireland Operations, 70 Sir John Rogerson's Quay, Dublin 2, D02R296, Company ID No. 256796, registered in the register of cloud computing providers pursuant to Section 6q of Act No. 365/2000 Coll. on public administration information systems (as amended with effect from 1 September 2021 under No. 031, entry dated 14 March 2023)

Microsoft Ireland Operations is the operator of Microsoft Azure, the cloud platform on which the Twigsee Application runs. Microsoft Azure complies with international standards for information security management systems, including security in cloud environments, namely ISO 27001 and ISO 27017. The relevant ISO certificates are available on the Microsoft website or will be provided by the Provider upon request. All data within the Microsoft Azure system is primarily stored in the Europe West data centre, exclusively within the territory of and subject to EU legislation. https://download.microsoft.com/download/2/C/8/2C8CAC17-FCE7-4F51-9556-4D77C7022DF5/MCA2017Agr_EMEA_EU-EFTA_CZE_Sep20172_CR.pdf

- 4.3. The Provider is authorised to disclose personal data to other parties to the extent necessary only where required by law or where necessary to protect the Provider's legitimate interests. The Provider is authorised to disclose personal data to companies forming a group with the Provider to the extent necessary.
- 4.4. The Provider does not transfer personal data to any third party. The Provider does not transfer personal data to a country outside the EU or to an international organisation.

5. Data subject rights in relation to the protection of personal data

- 5.1. The data subject (User) has, in particular, the right to withdraw their consent to the processing of personal data at any time, the right to rectify or supplement their personal data, the right to request restriction of processing, the right to object to or lodge a complaint against the processing of personal data, the right of access to personal data, the right to request the portability of personal data, the right to be informed of a personal data breach and, under certain conditions, the right to have certain personal data erased which the Provider processes in connection with the Service.

- 5.2. The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning the data subject or similarly significantly affects them. The Provider does not use personal data for the purposes of automated decision-making.

- Withdrawal of consent

Any consent to the processing of personal data may be withdrawn at any time by means of a written statement sent electronically to the Provider's email address specified in the Contact Details.

Consent to receive electronic marketing communications from the Provider may also be withdrawn by clicking on the unsubscribe link in the marketing email received.

- Amendments and additions

The data subject may amend, delete or supplement their personal data via email, through their user account in the Twigsee app, or in writing to the Provider's email address.

- Access and portability

The data subject may, in writing to the Provider's email address as set out in the Contact Details, request a summary of the personal data processed by the Provider, or request that the Provider transfer such data to another controller as specified by the data subject.

In accordance with current legislation, the data subject has the right, in relation to their personal data, to access information concerning:

- a) the purpose of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) the envisaged period for which the personal data will be processed and stored;
- e) the right to request that the data controller rectify or erase personal data, or restrict its processing, or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority; and
- g) all available information regarding the source of the personal data, unless it has been obtained from the data subject.

- Deletion

The data subject may at any time request, via the Provider's email address specified in the Contact Details, that the Provider erases their personal data. However, erasure shall not affect data contained in documents which the Provider is required by law to retain (e.g. invoices or credit notes) or data which the Provider needs to exercise its rights (e.g. where the Provider has an outstanding debt on record against the User).

With the exception of the cases mentioned above, the data subject has the right to erasure in the following circumstances:

- a) the personal data is no longer necessary for the purposes for which it was processed;
- b) the data subject has withdrawn their consent on the basis of which the data were processed and there is no other legal basis for their processing;

- c) the data subject has objected to the processing of personal data and considers that, upon assessment of the objection, it will become apparent that, in the specific situation, the data subject's interests outweigh the Provider's interest in processing such personal data;
- d) the personal data is being processed unlawfully;
- e) the obligation to erase the data is laid down by a specific legal provision; and
- f) the personal data relates to children under the age of 16.
- Right to object
If the data subject does not wish the Provider to process their personal data on the basis of a legitimate interest, they may lodge an objection with the Provider in writing.
- Restriction of processing
The Provider shall restrict the processing of personal data if the data subject:
 - a) points out an inaccuracy in their personal data;
 - b) believes that the processing is unlawful and, instead of erasure of the personal data, requests a restriction on its use;
 - c) the Provider no longer requires the personal data for the purposes of processing, but the data subject requires it for the establishment, exercise or defence of legal claims; and
 - d) the data subject objects to the processing of personal data.
- Lodging a complaint
If the data subject believes that the Provider is processing their personal data unlawfully, they may lodge a complaint with the Provider at any time and may also contact the Office for Personal Data Protection, www.uoou.cz

6. Duration of processing

- 6.1. The Provider processes personal data for the duration of the contract for the provision of the Service and its performance, and further for the limitation period of claims arising from this contract.
- 6.2. In the case of the processing of personal data to which the data subject has given consent (including for marketing purposes), personal data is processed for a period of 5 years from the termination of the contractual relationship with the Provider, or until such consent is withdrawn.
- 6.3. Upon expiry of the above-mentioned period, the Provider shall erase the personal data, unless it is authorised or obliged to process such data on another legal basis or for the purposes of conducting any legal proceedings.

7. Cookies

- 7.1. The Provider's website uses the Google Analytics service provided by Google, Inc.
- 7.2. Google Analytics uses cookies, which are text files stored on the data subject's computer and enable an analysis of their use of the Website. The information generated by the cookie regarding the use of the Website (including your anonymised IP address) will be transmitted to and stored by Google on servers in the USA. Google, Inc. will use this information for the purposes of evaluating the use of the Website and compiling reports on its activity for the Provider as the Website operator, and for providing other services relating to Website activity and internet usage. All such information is anonymous (it only tracks trends, such as users' clickstreams) and cannot be attributed to a specific individual.
- 7.3. Further information on Google Analytics cookies can be found here: <https://www.google.com/analytics/terms/cz.html> or <https://policies.google.com/technologies/cookies?hl=cz>.

- 7.4. Google Inc. may disclose this information to third parties where required to do so by law, or where such third parties process the information on behalf of Google Inc. Google Inc.
- 7.5. The data subject may refuse the use of cookies by selecting the appropriate settings in their browser. However, in such cases, certain personalised features may not be available to the data subject, and they will not be able to make full use of all the features of the Website.
- 7.6. These Privacy Policy terms are drawn up in the Czech and English languages. In the event of any ambiguities or discrepancies between the language versions, the Czech version shall prevail.

This policy is valid and effective from 18 August 2026.

This policy forms an integral part of the Provider's terms and conditions relating to the Premium Parent service. The current version of this policy is always published on the Website. The Provider may update the Privacy Policy as necessary by publishing a new version on the Website. In the event of changes to the policy, the User will be notified of such changes at the email address provided in the booking form. Users are advised to regularly check the information and conditions regarding the processing of personal data published on the Website.