## **PRIVACY POLICY**

This privacy policy governs the way Jarmila Špirutová s.r.o.

scollects, uses, maintains and handles the information obtained from users (hereinafter referred to as "the User") of the website **www.smartacademia.cz** (hereinafter referred to as "the Website").

This privacy policy applies to all products and services offered by **Jarmila Špirutová s.r.o.** Personal Information

Personal information is data that can be used to uniquely identify or contact a single person. We DO NOT collect, store or use any personal information while you visit, download or upgrade our aplication or our products, excepting the personal information that you submit to us when you create a user account, send an error report or participate in online surveys and other activities. Only for the following purposes that we may use personal information submitted by you: help us develop, deliver, and improve our products and services and supply higher quality service; manage online surveys and other activities you've participated in. In the following circumstances, we may disclose your personal information according to your wish or regulations by law:

- Your prior permission;
- By the applicable law within or outside your country of residence, legal process, litigation requests;
- By requests from public and governmental authorities;
- To protect our legal rights and interests.
- Personal Identification Data

We can collect personal identification data from the Users in various ways, including, but not limited to, in case the Users visit our Website, sign up for the Website, based on which activities, services, functions and sources which are then made accessible on our Website are implemented and used. The Users may be asked to provide their e-mail addresses. We will collect the personal identification data from the Users only if they submit the information to us at their discretion. The Users can always refuse to provide the personal identification data; however, the act can prevent them from participation in some activities on our Website.

#### **Non-Personal Information**

Non-personal information is data in a form that does not permit direct association with any specific individual, such as your Android ID, CPN model, memory size, your phone IMEI number, phone model, rom, phone operator, location, install, uninstall, frequency of use, etc. We may collect and use non-personal information in the following circumstances. To have a better understanding in user's behavior, solve problems in products and services, improve our products, services and advertising, we may collect non-personal information such as the data of install, frequency of use, country, equipment and channel. If non-personal information is

combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Policy.

#### **Non-Personal Identification Data**

We can also collect non-personal identification data on the Users in case of their interaction with our Website. The Non-Personal Identification Data can include the name of the internet browser, the type of computer and technical information about the User, which means the information relating to the connection to our Website, such as the operation system, internet service provider and other similar information.

#### **Protection of Personal Information**

We take precautions — including administrative, technical, and physical measures — to safeguard your personal information against loss, theft, and misuse, as well as against unauthorized access, disclosure, alteration, and destruction. All personal information with which the application works, are neither shared, nor forwarded.

#### **Internet Browser Cookies**

Our website can enhance the Users' comfort by using "cookies". The User's internet browser saves the cookies on the hard drive to maintain the records and monitor information about them. The Users can set their browsers to refuse the cookies or to warn about them when the cookies are to be sent. Should they do that, it may happen that some functions of the Website will not work properly.

# What is Our Practice of Information Collection

Jarmila Špirutová s.r.o.

can collect and use the User's personal data for the following purposes:

- For the process of payment settlement. We can use the personal information submitted by the user to create and place the order and to provide the service on the basis of the order. This information is not shared with any third parties, except for the scope required to provide the service.
- To send regular e-mails. We can use the submitted e-mail address to send information and changes concerning their orders.

### How Is Your Information Protected?

We have taken appropriate measures to collect data, to store and process procedures, and safety measures for protection against unauthorized access, modifications, disclosure and destroying your personal data, username, password, transaction information and data stored on our Website. Sharing your Personal Information: We do not resell trade or lend the users' personal data to any third parties. We can share general summary demographical information which is not related to any personal identification information to visitors, users, our business partners, reliable affiliated companies and advertisers for the aforementioned purposes.

#### **Changes in the Privacy Policy**

**Jarmila Špirutová s.r.o.** at its discretion, has the right to change this privacy policy. Should we do that, the changes will be added with the respective date at the end of this document and an informative e-mail will be sent to you. We recommend that the Users check the Website on a regular basis to stay informed about how we help to protect their personal data they have submitted to us. You take note of the fact and you agree that you take responsibility for reading this privacy policy and you will follow this information regularly and take the changes into account. By using this Website, you manifest your consent with this privacy policy and terms and conditions of the service. Should you disagree with this privacy policy, please, refrain from using our Website. Should you use this Website after registration of the change in the privacy policy, you will manifest your consent with these changes.

#### Feel Free to Contact Us

Should you have any questions as to this privacy policy, Website practices or your consent with the Website, please, contact us at: **Jarmila Špirutová s.r.o.** 

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