



IMPACT HUB PRIVACY AND PERSONAL DATA PROCESSING POLICY

We process personal data only when necessary and only to the extent required for the given purposes. At the same time, we ensure that the data available to us are correct, appropriately protected and not used for any other purposes. We only process personal data for the necessary period of time. This document is primarily intended to inform you about the details of the processing and your rights.

Controller

We are HUB VENTURES a.s., IČO (Company ID Number): 024 18 321, having its registered office at Drtinova 557/10, Smíchov, 150 00 Prague 5, a group of companies which include:

- RegioHub, s.r.o., IČO (Company ID Number): 24145424, having its registered office at Drtinova 557/10, 150 00 Prague 5;
- Hub s.r.o., IČO (Company ID Number): 29021391, having its registered office at Drtinova 557/10, 150 00 Prague 5;
- K10 SERVICES s.r.o., IČO (Company ID Number): 05351243, having its registered office at Na Kozačce 1103/5, 120 00 Prague 2;
- Hub Innovation s.r.o, IČO (Company ID Number): 28459938, having its registered office at Drtinova 557/10, Prague 5;
- Hub for Change, spolek, IČ (Company ID Number): 02228025, having its registered office at Drtinova 557/10, 150 00 Prague,

(hereinafter referred to as “Impact Hub”, “we”, “our” or “us”), email: osobni-udaje@impacthub.cz

Terms and Definitions

Data subject = you

Data subject means an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Controller = we

As defined in Art. 4 (7) GDPR, controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. We are the controller of your personal data.

Processor

As defined in Art. 4 (8) GDPR, processor means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller as instructed by the controller.

Supervisory authority

In the Czech Republic, supervisory authority means the Office for Personal Data Protection (hereinafter referred to as the “ÚOOÚ”).

Job candidate

Job candidate means a person applying for a job in the controller’s company and participating in a selection procedure. The selection procedure may end with the selection of a suitable candidate or by termination of the selection procedure.

Customers

As used herein, Customers means persons using Impact Hub services.

Business partners

Business partner means an entrepreneur as well as a non-entrepreneur with whom we have entered into any contract, except for persons who qualify as customers. This term includes but is not limited to supplier relationships

Affiliated organizations

Affiliated organizations are those entities that are subsidiaries of Hub Ventures. That includes the following entities:

- Hub s.r.o., IČ (Company ID Number): 29021391, having its registered office at Drtinova 557/10, 150 00 Prague 5 - Smíchov
- RegioHub s.r.o., IČ (Company ID Number): 24145424, having its registered office at Drtinova 557/10, 150 00 Prague 5 - Smíchov
- Hub Innovation s.r.o., IČ (Company ID Number): 28459938, having its registered office at Drtinova 557/10, 150 00 Prague 5 - Smíchov
- Hub for Change, spolek, IČ (Company ID Number): 02228025, having its registered office at Drtinova 557/10, 150 00 Prague 5 - Smíchov
- K10 services s.r.o., IČ (Company ID Number): 05351243, having its registered office at Na Kozačce 1103/5, 120 00 Prague 2 - Vinohrady

Categories of Data Subjects, Personal Data Processed, Purpose, Legal Basis and Processing Period

We process personal data for clearly defined purposes:

Categories of data subjects	Purpose of personal data processing	Legal basis and personal data processed	Processing period
Job candidates	Selection of a suitable job candidate.	<ul style="list-style-type: none"> The legal basis is negotiating an employment contract. For this purpose, we process primarily identification details, contact details and other data provided by the candidate, including but not limited to data provided in the candidate's CV and cover letter, and an extract from the criminal records if necessary or appropriate 	For this purpose, personal data may be processed for up to 6 months after the end of the selection procedure (for the purpose of re-establishment of contact in the event that the selected candidate's employment is terminated during the probationary period).
	Proving the lawfulness of the procedure when selecting job candidates.	<ul style="list-style-type: none"> The legal basis is the Impact Hub's legitimate interest to prove non-discrimination For this purpose, we may process primarily identification details, contact details and other data provided by the candidate, including but not limited to data provided in the candidate's CV and cover letter. 	For this purpose, personal data may be processed for the period of 3 years (to prove non-discrimination if necessary).
Customers	Negotiating contracts and handling inquiries.	<ul style="list-style-type: none"> The legal basis is negotiating a contract. For this purpose, we process identification details (including but not limited to first name, middle name, last name) and contact details (including but not limited to email address and phone number). 	For this purpose, personal data may be processed for the duration of negotiations regarding the conclusion of the contract, or while the customer is on the waiting list.
	Execution and performance of contracts concerning the provision of Impact Hub services.	<ul style="list-style-type: none"> The legal basis is the performance of a contract between the customer and Impact Hub. For this purpose, we process identification details (including but not limited to first name, middle name, last name, date of birth, IČO (Company ID Number), DIČ (Tax ID Number), nationality), contact details (including but not limited to delivery address or address of residence, email address, phone number), details of work activities (website, links to publicly accessible social media profiles; work experience), bank details (bank account number and bank code), details of purchase orders, complaints, names and categories of products, in which the customer is involved, photos. 	For this purpose, personal data may be processed for the duration of obligations arising from the contract .

<p>Exercising claims arising from contractual relationships after the contract terminates.</p>	<ul style="list-style-type: none"> • The legal basis is Impact Hub’s legitimate interest. • For this purpose, we process identification details, contact details, accounting details, history of purchase orders and complaints, and history of communication. After the contract is terminated, these personal data are necessary to handle complaints, recover debts and enforce compliance with other obligations arising from contracts concluded between Impact Hub and customers. This documentation may include identification and contact details of natural persons representing legal entities. 	<p>For this purpose, personal data may be processed for the period of 10 years after the termination of the contractual relationship and, if administrative or court proceedings are initiated, for the entire duration of the proceedings.</p>
<p>Disseminating commercial communication via email in the form of newsletters containing information about the range of services offered and news.</p>	<ul style="list-style-type: none"> • The legal basis is Impact Hub’s legitimate interest. • Identification and contact details of customers are processed for the purpose of disseminating commercial communication in accordance with Act No. 480/2004 Sb. • In the event that a person cannot be considered a customer as defined in Act No. 480/2004 Sb., we send them commercial communication at their request only with their express consent. 	<p>For this purpose, the personal data may be processed for an unlimited period of time until the recipient unsubscribes.</p>
<p>Compliance with Impact Hub’s accounting, tax and other statutory obligations.</p>	<ul style="list-style-type: none"> • The legal basis is compliance with statutory obligations imposed on Impact Hub by legislation such as the Accounting Act or the Value Added Tax Act and other tax laws etc. • We process identification details, contact details, accounting details, history of purchase orders and complaints, and history of communication. After the contract is terminated, these personal data are necessary to handle complaints, recover debts and enforce compliance with other obligations arising from contracts concluded between Impact Hub and customers. 	<p>For this purpose, personal data may be processed for up to 10 years after the end of the tax period in which the transaction occurred.</p>
<p>Marketing (Impact Hub promotion).</p>	<ul style="list-style-type: none"> • The legal basis is the customer’s consent. • For this purpose, we process photos, video recordings and/or text quotes of customers together with their identification details and publish them online, in promotional materials etc. • Where these are group photos or video recordings without any identification of the customers, the legal basis is the legitimate interest of the Impact Hub. 	<p>For this purpose, personal data are processed for the duration of the consent. Group photos without identification may be processed for an unlimited period of time. However, the photo or video recording will be deleted at the request of the person shown.</p>

	Monitoring and statistics.	<ul style="list-style-type: none"> The legal basis is Impact Hub's legitimate interest to improve its services. For this purpose, we process behavioral details concerning the customer which include but are not limited to attendance at Impact Hub events, opening emails sent by Impact Hub, payment monitoring, frequency of signing online petitions and other online and offline activities. 	For this purpose, personal data may be processed for the duration of obligations arising from contracts concluded between the customer and Impact Hub. We process anonymized data for an unlimited period of time.
Business partners	Performance and execution of contracts.	<ul style="list-style-type: none"> The legal basis is the performance of a contract concluded between the entity and Impact Hub For this purpose, we process data of natural persons, with whom we communicate when concluding and executing contracts, and the contracting parties, specifically identification details (including but not limited to first name and last name), contact details (including but not limited to delivery address or address of residence, email address, phone number), accounting details (including but not limited to bank account number), payment details etc. 	For this purpose, personal data may be processed for the duration of obligations arising from the contract.
	Exercising claims arising from contractual relationships after the contract terminates.	<ul style="list-style-type: none"> The legal basis is Impact Hub's legitimate interest. For this purpose, we process identification details, contact details, accounting details, history of communication. After the contract is terminated, these personal data are necessary to recover debts and enforce compliance with other obligations arising from contracts concluded between the Impact Hub and the relevant entities. This documentation may include identification and contact details of natural persons representing legal entities. 	For this purpose, personal data may be processed for the period of 10 years after the termination of the contractual relationship and, if administrative or court proceedings are initiated, for the entire duration of the proceedings.
	Compliance with Impact Hub's accounting, tax and other statutory obligations.	<ul style="list-style-type: none"> The legal basis is compliance with statutory obligations imposed on Impact Hub by legislation such as the Accounting Act or the Value Added Tax Act and other tax laws, Act on Selected Measures Against Legitimation of Proceeds of Crime and Financing of Terrorism etc. We process identification details, contact details, accounting details, history of communication. After the contract is terminated, these personal data are necessary to handle complaints, recover debts and enforce compliance with other obligations arising from contracts. 	For this purpose, personal data may be processed for up to 10 years after the end of the tax period in which the transaction occurred.

We retain personal data only for the period necessary for the purpose of their processing - see table above. After the expiration of this period, personal data may be retained only for the purposes of the national statistics service, for scientific purposes as well as for the purposes of archiving.

Recipients of personal data and transfer of personal data outside the European Union

In reasoned cases, we may transfer your personal data to other entities (hereinafter referred to as the “recipients”).

Personal data may be transferred to the following recipients:

- Affiliated organizations
- Processors, who process your personal data according to our instructions (primarily software providers and IT administrators), and relationships with such processors are regulated by data processing agreements:

Bit Carvers s.r.o., IČ (Company ID Number): 04507517, having its registered office at Neklanova 112/9, 128 00 Prague

- Provider of internal software for the administration of purchase orders, member tariffs, accounting and more
- We transfer our customers’ personal data for the purposes of performing or executing contracts in the provision of Impact Hub services
- We transfer members’ personal data for the purposes of performing or executing contracts in the provision of Impact Hub services and sharing contact details within the member community

The Rocket Science Group LLC, having its registered office at 675 Ponce de Leon Avenue, Atlanta, United States

- Provider of an email marketing system
- We transfer our customers’ personal data for the purposes of Impact Hub marketing and promotional activities

Prodimo Accounting s.r.o., IČ (Company ID Number): 24840891, with its registered office at Francouzská 284/94, Vršovice, 101 00 Prague 10

- Accounting firm
- We transfer our customers’ and suppliers’ personal data for the purposes of keeping tax and accounting records
- We transfer our employees’ personal data for the purposes of payroll accounting

- Processors who process your personal data according to our instructions:

Google Ireland Limited, Gordon House, Barrow Street. Dublin 4, Ireland

- Provider of the Google Drive service used to store data in an online repository
 - » We transfer personal data of all entities mentioned in this policy only for the purposes of archiving
- Google Analytics service provider
 - » We transfer behavioral data on visits to our website for the purposes of improving its functionality

- Public authorities and other entities if required by applicable legislation (including but not limited to financial administration, Police of the Czech Republic and other investigative, prosecuting and adjudicating bodies etc.), other entities in case of emergencies if data disclosure is necessary to protect life, health, property or another public interest or if to protect our rights, property or safety.

Cookies

Cookies are small files containing data, settings and preferences stored in your browser on your device. They allow you to personalize your content to improve your user experience. However, as the operator of the website, we can only use and store cookies with your consent (except for technical cookies).

We collect **3 main types of cookies on our websites:**

- Technical
 - » Technical cookies are necessary for the functioning of the website and their collection does not require consent.
- Analytical
 - » Analytical cookies are anonymized and help us understand how you use our website.
- Marketing
 - » We collect marketing cookies to be able to offer you services and products relevant to your interests.

Some cookies are placed on our website by third party services and are governed by the privacy and personal data processing policies of such third parties.

We use a pop-up window on our website to inform you about the use of cookies and to give you the option to manage them. This can be activated from the bottom right corner of the screen on a computer, and it appears when you first open a page on a mobile phone. The tool activation button is not displayed on devices with a resolution under 768px. You can change or withdraw your consent at any time.

Your rights as a data subject

You have the right to request that we grant you **access to personal data concerning you** under the conditions set out in Article 15 GDPR.

You have the right to revoke at any time your consent to the processing of personal data that we process based on your consent under the conditions set out in Article 7 GDPR.

You have the right to request that we **rectify personal data** under the conditions set out in Article 16 GDPR, **limit the processing of personal data** under the conditions set out in Article 18 GDPR or erase data under the conditions set out in Article 17 GDPR.

You have the right to **object to processing of personal data** concerning you under Article 21 GDPR.

You have the right to **portability of data to another controller** under the conditions set out in Article 20 GDPR.

You have the right **not to be subject to a decision based solely on automated processing, including profiling**, under the conditions set out in Article 22 GDPR. When processing personal data, **we do not use automated individual decision-making**, including profiling, i.e. without human intervention.

You have the right to **obtain information about any breach of your personal data** under the conditions set out in Article 34 GDPR.

If you believe that the processing of your personal data violates your obligations laid down in the GDPR, you have the right to **lodge a complaint with the supervisory authority** under the conditions set out in Article 77 GDPR. The Office for Personal Data Protection is the supervisory authority in the Czech Republic.

This Privacy and Personal Data Protection Policy is effective from 1st March 2023.

Úřad pro ochranu osobních údajů
(Office for Personal Data Protection)
Plk. Sochora 27, 170 00 Prague 7
Phone: 234 665 111