

POWER NODES PRIVACY POLICY

Identification of personal data controller: Power Nodes s.r.o., ID no. 17655455, with its registered seat at Počernická 699/62, Malešice, 108 00 Praha 10, incorporated under the laws of the Czech Republic, registered at Municipal Court in Prague under the file No. C 374553 (“**we**”).

Contact details: hello@power-belt.cz

We provide you with Power Belt application (“**Power Belt**”) and in this Privacy policy, we would like to inform you about how we process your personal data when using Power Belt. All information about Power Belt is available on the website: <https://power-belt.cz/> (“**website**”).

We recommend that you read this information carefully. If you have any questions, you can contact us at any time using the contact details below. As we are company located in European union, the processing of personal data is governed by Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (“**GDPR**”) and other relevant privacy regulation applicable to us.

We also use cookies on our website. For more information, please see our cookies policy which is available here: power-belt.cz/downloads/cookie-policy.pdf

A. PERSONAL DATA PROCESSED

As we want to be as transparent as possible, we divided personal data that we process about you as personal data controller into these categories:

- **Identifiers**, such as name and surname (if provided via Single Sign-On and depending on your settings), company name, job title and other account-related identifiers.
- **Contact details**, such as phone number (if provided) and e-mail.
- **Billing information**, such as billing address, company identification number, VAT number and other invoicing details.
- **Registration information**, such as user ID, password (hash).
- **Purchase information**, such as chosen pricing plan, payments made, records of payments.
- **Communication data**, such as text, messages, information about communication between us, feedback, troubleshooting communication, attached files and additional information, information about solution of your issues and other information shared with us when communicating.
- **Usage data**, such as uploaded content, projects and other information gathered when using Power Belt app.
- **Technical data**, such as IP address, logs, device identifiers, browser information and (where enabled) product usage diagnostics and session-related telemetry (e.g., to help us troubleshoot and improve the app), marketing preferences.
- **Cookies data**, such as analytics data, marketing data, security and safety data. All information about cookies is available in the cookies policy. Depending on your choices, cookies may include strictly

necessary cookies (e.g. storing your cookie preferences), analytics cookies (e.g. website traffic measurement), marketing cookies (e.g. attribution/advertising measurement) and cookies from embedded third-party content (e.g. video or design embeds). Where such third-party cookies are not strictly necessary, we only place them after you have provided your consent.

Please, do not use Power Belt to upload any sensitive information about you or any other person, such as health data, genetic data, biometric data, data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, data concerning sexual orientation.

Power Belt is not designated for children. Power Belt does not intentionally collect or process personal data of minor under 13 years old. If you upload such data, you are solely responsible for any damage or loss that we may suffer because of his untruthful declaration.

***Please note:** In relation to certain Usage data, Identifiers and data uploaded or generated in the app when you use Power Belt on behalf of your employer/customer organization, we may process such data as a data processor on behalf of the relevant customer (data controller). In such cases, the customer's own privacy information and our data processing agreement (DPA) apply to that processing.*

B. PURPOSES OF THE PROCESSING OF PERSONAL DATA

B.1 Contract relationship

We primarily process personal data to provide you with Power Belt app and to treat you (or your company) as a customer, when you Sign Up and agree with T&C, or when you use Single-Sign-On feature. Personal data is processed to authenticate you as the user, enable features of the Power Belt app, use its functionalities, perform customer support, ensure proper function of the app. As part of this, we may also send you messages about the conclusion and performance of a contract, authentication e-mails, new releases, payment reminders or approvals, etc.

For this purpose, we process these **categories of personal data**:

- Identifiers, E-mail address, Purchase information, Communication data, Usage data and Cookies data (in the scope of required for proper functionalities of the Power Belt app).

The **legal basis** for this processing is the performance of the contract between you and us and the need to take steps at your request before entering the contract.

The data are processed for the duration of the mutual relationship and for the period necessary for the performance of the obligations under such contract and thereafter for up to 2 years to handle claims and disputes (unless a longer retention is required by law).

B.2 Improving Power Belt and analytics

We may process data about how you use Power Belt (e.g. what features you use most, effectiveness of features, performance and diagnostics) so that we can better understand usage trends and improve and further develop Power Belt. This may include the use of analytics and troubleshooting tools (e.g., to understand feature usage and to diagnose errors).

Where we use cookies or similar technologies for analytics purposes, we do so only based on your consent.

For this purpose, we process these categories of personal data:

- Identifiers (where applicable), E-mail address (where applicable), Purchase information, Communication data, Usage data, and Cookies data (only if you consent to non-essential cookies).

The legal basis for this processing is our legitimate interest in improving Power Belt and services. Where analytics cookies or similar technologies are used, the legal basis is your consent. The data is processed for a maximum of 3 years from the date of collection (unless a shorter period is set in our Cookies Policy / cookie settings).

B.3 Internal records, statistics, and protection of our rights

We may process your data for the purposes of keeping internal records within our company, recording subscriptions made, producing statistical reports, protecting our rights and legal claims, and to ensure that only you use Power Belt in accordance with their terms.

For this purpose, we process these **categories of personal data**:

- Identifiers, E-mail address, Purchase information, Communication data, Usage data, and Cookies data (strictly necessary cookies and, where applicable, consent-based cookies).

The **legal basis** for this processing is our legitimate interest in keeping internal records, statistics, and the protection of our rights. The data is processed until a maximum of 10 years after the termination of the concluded contract (or longer in the event of a dispute).

B.4 Support and promotion of our products and services

If you subscribe to our newsletter (e.g., during registration or via a separate form on our website), we will process your e-mail address and related subscription records to send you updates, product news and marketing communications.

For this purpose, we process these **categories of personal data**:

- E-mail address and Marketing preferences (opt-in/opt-out records, including double opt-in confirmation).

The **legal basis** for this processing is your consent. You can withdraw your consent at any time by using the unsubscribe link in each email.

The data are processed until you withdraw your consent.

B.5 Fulfilling legal obligations

We may also process your personal data in order to comply with our legal obligations, particularly in the area of tax and accounting. At the same time, we need to be prepared to provide cooperation to state authorities if we are required to do so by law.

For this purpose, we process these **categories of personal data**:

- Identifiers, E-mail address, Purchase information and Communication data (and other data required by applicable law)

The **legal basis** for this processing is the fulfilment of our legal obligations. The data is processed for the period required by law.

B.6 Third-Party advertising

If you give us your consent, we (and/or our partners) may use marketing cookies and similar technologies to measure advertising performance, attribute conversions and, where applicable, display relevant advertising. The specific third parties and tools will be presented to you in the cookie banner / cookie settings at the moment you give consent.

For this purpose, we process these categories of personal data:

- Cookies data and online identifiers (e.g. device identifiers / cookie IDs), and where applicable information about your interactions with Power Belt app.

The legal basis for this processing is your freely given consent. You may withdraw this consent at any time via the cookie settings. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Data is processed until you withdraw your consent and, in any case, no longer than the retention periods set for the respective cookies in our Cookies Policy.

B.7 Power Belt and website operation and security (a necessity)

We process your personal data for the operation of Power Belt and its security, i.e. for the presentation of information in Power Belt or on the website, the internal functioning of Power Belt and website, your identification as a user when using and repeated visits to Power Belt or website and for ensuring your security.

For this purpose, we process your:

- Technical data, Usage data and Cookies data (strictly necessary cookies required for the operation, security and storing your cookie preferences).

The **legal basis** for this processing is our legitimate interest in the proper functioning and safe operation of Power Belt and our website. Data are processed, as a rule, for the duration of your visit of the website or Power Belt, for a maximum of 1 year from the date of collection.

Further information is available in cookies settings.

B.8 Power Belt/website support and promotion (marketing)

We use marketing cookies and similar technologies only based on your consent. These cookies help us measure advertising performance, attribute conversions and, where applicable, show you relevant advertising.

For this purpose, we process your:

- Cookies data and online identifiers (e.g. cookie IDs) and information about interactions with our website/Power Belt.

The **legal basis** for the use of marketing cookies is your consent. Personal data is processed until you withdraw your consent (or for the periods set in our Cookies Policy / cookie settings).

Further information is available in cookies settings.

C. SHARING OF PERSONAL DATA

We may share your personal data with other companies in our group who also process data in accordance with this document and helps us with better analytics.

At the same time, we may share personal information with third parties who help us provide Power Belt to you. These parties act as our data processors and process personal data for us, within the scope of our processing purposes set out above. Those data processors may be:

- Stripe (payments) - Stripe Payments Europe, Limited
- Supabase (database and authentication, hosted on AWS infrastructure) - Supabase, Inc., the transfer is based on Standard Contractual Clauses.
- Cloud infrastructure providers used for hosting and storage (e.g., AWS via Supabase, Azure, OVHcloud – in EU data centres) - Amazon Web Services EMEA SARL, Microsoft Ireland Operations Limited, OVH Groupe SA.
- Website analytics and marketing providers (e.g., Google Analytics, Google Ads) - Google Ireland Limited and Google LLC (company is registered under Data Privacy Framework).
- Product analytics - LogRocket, Inc. (company is registered under Data Privacy Framework)
- E-mail/newsletter delivery provider
- Provider of invoicing software (vyfakturuj.cz) - Redbit s.r.o.
- Mailsend Inc.
- Accounting/law service providers
- AI technology providers used for specific features (e.g., OpenAI and Google/Gemini) - OpenAI Ireland Ltd., Google LLC (company registered under Data Privacy Framework).

In addition to this, if we process your personal data for fulfilling legal obligations, we may share your personal data with certain third parties as data controllers for this purpose where we are obliged to do so under applicable legislation (in particular, administrative authorities, police authorities and judicial authorities). Similarly, we may be obliged to share your data with persons who claim to have been harmed by your conduct.

Where we share your personal data with controllers and processors in third countries (outside the EEA), we only do so where there is a decision by the European Commission that a particular country outside the EEA provides an adequate level of data protection, including where controllers or processors have adopted additional data protection measures such as Binding Corporate Rules (BCRs) or Standard Contractual Clauses (SCCs).

D. YOUR RIGHTS IN PROCESSING AND THE POSSIBILITY OF EXERCISING THEM

Just as we have rights and obligations when processing your personal data, you have certain rights when processing your personal data as set out in the following paragraphs. You have the right to (i) request access to your personal data; (ii) withdraw your consent; (iii) request rectification of your personal data; (iv) request erasure of your personal data; (v) request restriction of the processing of your personal data; (vi) request

portability of your personal data; (vii) object to the processing of your personal data; or (viii) lodge a complaint with the relevant supervisory authority.

In all matters related to the processing of your personal data, whether it is a question, the exercise of rights, sending a complaint to our hands, etc., you can contact us at hello@power-belt.cz.

Your request will be processed without undue delay, at most within 1 month. In exceptional cases, in particular due to the complexity of your request, we are entitled to extend this period by a further 2 months. We will, of course, always inform you of any such extension and the reason for it.

You also have the right to lodge a complaint with the supervisory authority as described below.

D.1 Right of access

You have the right to obtain confirmation from us as to whether or not we are processing your personal data.

If we process your personal data, you also have the right to request access to information about the purpose and scope of the processing, the recipients of the data, the duration of the processing, the right to rectification, erasure, restriction of processing and to object to the processing, the right to lodge a complaint with a supervisory authority and the sources of the personal data (this information is already provided in this document).

You can also ask us for a copy of the personal data we process. We provide the first copy free of charge; further copies may be subject to a fee. The scope of the data provided may be limited so as not to interfere with the rights and freedoms of others.

D.2 Right to withdraw consent

You have the right to withdraw your consent to the processing of personal data at any time. However, the withdrawal of consent does not affect the lawfulness of the processing prior to such consent, nor does it lead to the termination of the processing of personal data that has already been anonymized.

D.3 Right to repair

You have the right to request us to correct inaccurate personal data concerning you. Depending on the purpose of the processing, you may also have the right to have incomplete personal data completed, including by providing an additional declaration.

D.4 Right to erasure (right to be forgotten)

You have the right to request the deletion of your personal data in cases where:

- we no longer need your personal data for the purposes for which it was collected or processed;
- you withdraw the consent on the basis of which the personal data was processed and there is no further reason for processing it;
- you object to processing and there are no other overriding reasons for processing, or you object to processing for direct marketing purposes;
- personal data is processed in violation of the law.

However, you cannot exercise this right where the processing is necessary for compliance with our legal obligations or tasks entrusted to us in the public interest or for the establishment, exercise, or defense of legal claims.

D.5 Right to restriction of processing

You have the right to request restriction of the processing of your personal data in cases where:

- you contest the accuracy of your personal data; in this case, you may request a restriction of processing until the accuracy of the personal data has been verified;
- the processing is contrary to the law and instead of erasure, you request a restriction of the processing of personal data;
- we no longer need your personal data for the purposes for which it was collected or processed, but you require it for the establishment, exercise, or defense of legal claims;
- you have objected to the processing of your personal data; in this case, you may request a restriction of processing until it is verified that our legitimate interests prevail.

D.6 Right to portability

You have the right to obtain a copy of your personal data that we process by automated means on the basis of your consent or for the performance of a contract. We will transmit this data in a commonly used and machine-readable format to you or to a controller designated by you, if technically feasible. The scope of the data provided may be limited so as not to interfere with the rights and freedoms of others.

D.7 Right to object

You have the right to object to the processing of your personal data that we process on the basis of our legitimate interest. We will stop processing your data if there are no other overriding reasons for processing or if the processing is not necessary for the establishment, exercise, or defense of legal claims or if you object to processing for direct marketing purposes.

E. RIGHT TO FILE A COMPLAINT

In addition to the possibility of exercising your rights with our company, you can also file a complaint with the relevant supervisory authority, which is the Office for Personal Data Protection located at Pplk. Sochora 27, 170 00 Prague 7.