

PRIVACY POLICY AND PERSONAL DATA PROCESSING TERMS

Information for data subjects pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR)
dogsitting.cz | Version 1.0 | Effective as of 16 October 2026

I. Data Controller

The controller of personal data within the meaning of Article 4(7) of 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 (the “GDPR”) is **Martin Růžička, Company ID (IČO) 05788781, with its registered office at Terronská 873/3, Prague 6, Czech Republic**, providing animal care services under the name **dogsitting.cz** (the “Controller”).

Contact for data protection matters: **contact@dogsitting.cz**. The Controller has not appointed a Data Protection Officer, as there is no obligation to do so under Article 37 of the GDPR.

This policy informs the Controller’s customers (the “Customer” or the “data subject”) about which personal data the Controller processes, for what purposes and on what legal basis, for how long the data are retained, to whom they are disclosed, and which rights the Customer holds.

II. Legal Framework

The processing of personal data is governed in particular by the following legislation, as amended:

- Regulation (EU) 2016/679 (GDPR);
- Act No. 110/2019 Coll., on the Processing of Personal Data;
- Act No. 89/2012 Coll., the Civil Code, in particular Section 81 et seq. (protection of personality) and Sections 629 and 636 (limitation periods);
- Act No. 563/1991 Coll., on Accounting, Act No. 235/2004 Coll., on Value Added Tax, Act No. 586/1992 Coll., on Income Taxes, and Act No. 280/2009 Coll., the Tax Code (retention of accounting and tax records);
- Act No. 480/2004 Coll., on Certain Information Society Services, and Act No. 127/2005 Coll., on Electronic Communications (commercial communications and electronic communications);
- the Charter of Fundamental Rights and Freedoms of the Czech Republic (Articles 7 and 10) and the Charter of Fundamental Rights of the European Union (Articles 7 and 8);
- Commission Implementing Decision (EU) 2023/1795 (EU-US Data Privacy Framework) and Commission Implementing Decision (EU) 2021/914 (standard contractual clauses) for transfers of data to third countries.

III. Scope, Purposes and Legal Bases of Processing

The Controller processes only data that are necessary for the proper provision of animal care services (data minimisation, Article 5(1)(c) of the GDPR). The scope, purpose, legal basis and retention period are set out in the following table:

Category of data	Scope of data	Purpose and legal basis	Retention period
Owner’s identification and contact data	Full name, telephone number, e-mail address, residential address, and where applicable the address for the transport of the animal	Conclusion and performance of the contract, communication, arrangement of transport – Art. 6(1)(b) GDPR	Duration of the contractual relationship and 3 years after its termination

Category of data	Scope of data	Purpose and legal basis	Retention period
Data on the animal	Name, breed, behavioural characteristics, medical information, special requests	Proper and safe care of the animal, protection of its health, tailoring of the service – Art. 6(1)(b) and (f) GDPR	Duration of the contractual relationship and 3 years after its termination
Veterinarian contact	Name of the veterinarian or clinic, telephone number, address	Securing urgent veterinary care – Art. 6(1)(b) and (f) GDPR	Duration of the contractual relationship and 3 years after its termination
Backup contact person	Name and telephone number of the person designated by the Customer	Ensuring contact where the Customer cannot be reached – Art. 6(1)(f) GDPR (legitimate interest in protecting the animal and ensuring continuity of care)	Duration of the contractual relationship, and in any case no longer than 12 months after the last service was provided
Billing and payment data	Name, address, data on ordered services and payments	Compliance with legal obligations (accounting and tax) – Art. 6(1)(c) GDPR	Period prescribed by special legislation, generally 5 to 10 years
Correspondence and incident records	E-mail and written correspondence, records of extraordinary incidents	Protection of legal claims, handling of complaints – Art. 6(1)(f) GDPR	Limitation period (3 years, at most 10 years under Sections 629 and 636 of the Civil Code); in case of a dispute, until its final conclusion

Data on the animal. Data on the animal are not in themselves personal data. Where, however, they are linked to an identifiable owner, the Controller treats them with the same level of protection as personal data.

Special categories of data (Article 9 GDPR). The Controller does not intentionally process data concerning the health of natural persons. Should the Customer disclose such data on his or her own initiative (for example, an allergy relevant to the provision of the service), the Controller shall process it solely on the basis of explicit consent under Article 9(2)(a) of the GDPR and only to the extent necessary.

IV. Obligation to Provide Data and Data Relating to Third Parties

The provision of identification and contact data and data on the animal is a contractual requirement. Without such data, the contract cannot be concluded and the services cannot be properly provided.

The Customer declares that he or she is entitled to disclose to the Controller the data of the backup contact person and of the veterinarian, and undertakes to make these persons aware of this policy. The Controller obtained the data of these persons from the Customer; the information obligation under Article 14 of the GDPR towards these persons is fulfilled by means of this policy. These persons may exercise the rights set out in Article IX.

V. Recipients of Personal Data

Access to personal data is restricted to the Controller and to the following categories of recipients, in each case only to the extent necessary:

- **the Controller's official partners** under a collaboration agreement; they are contractually bound to confidentiality, to securing the data, to a prohibition on sharing the data with the public and to a prohibition on using the data for marketing purposes; where they act as processors, a contract pursuant to Article 28 of the GDPR is concluded with them;
- **the cloud service provider Google** as a processor (see Article VI);
- **a veterinarian or veterinary clinic** where urgent care of the animal is required;
- **tax and accounting advisers, legal representatives and insurers**, where engaged, in each case bound by a duty of confidentiality;
- **public authorities**, where required by law.

The Controller does not sell or publish personal data and does not use them for marketing, advertising or commercial communications of third parties.

VI. Storage of Data and Transfers to Third Countries

Personal data are stored (a) on the Controller's local hard drive and (b) in Google's cloud storage. Google processes the data as a processor on the basis of data processing terms pursuant to Article 28 of the GDPR.

Where the use of Google services may involve a transfer of data to a third country (in particular the United States of America), such transfer takes place on the basis of safeguards under Chapter V of the GDPR, namely a European Commission adequacy decision (EU-US Data Privacy Framework, Implementing Decision (EU) 2023/1795) or, where applicable, standard contractual clauses (Implementing Decision (EU) 2021/914) pursuant to Article 46 of the GDPR. The Controller shall provide a copy of the safeguards applied upon request.

VII. Retention Period

The Controller retains personal data only for as long as necessary to fulfil the purpose of processing (storage limitation, Article 5(1)(e) of the GDPR):

- data processed for the performance of the contract for the duration of the contractual relationship and subsequently for 3 years from the last service provided, i.e. for the general limitation period under Section 629 of the Civil Code;
- data of the backup contact person for the duration of the contractual relationship, and in any case no longer than 12 months after the last service was provided;
- accounting and tax records for the period prescribed by special legislation (in particular Act No. 563/1991 Coll., Act No. 235/2004 Coll. and the Tax Code), generally 5 to 10 years;
- data relating to the assertion or defence of legal claims for the limitation period, at most 10 years (Section 636 of the Civil Code), and in case of a dispute until its final conclusion;
- data processed on the basis of consent until the consent is withdrawn.

Upon expiry of these periods, the Controller shall without undue delay erase the data from the local storage and from the cloud storage, or irreversibly anonymise them.

VIII. Data Security and Personal Data Breaches

Having regard to the nature of the data, the Controller applies appropriate technical and organisational measures pursuant to Article 32 of the GDPR, in particular restriction of access to authorised persons, password protection, the use of encryption where technically feasible, regular backups, and a confidentiality undertaking by all persons with access to the data.

In the event of a personal data breach likely to result in a risk to the rights and freedoms of natural persons, the Controller shall notify the Office for Personal Data Protection within 72 hours after becoming aware of it (Article 33 of the GDPR). Where the breach is likely to result in a high risk, the Controller shall also communicate it to the affected data subjects without undue delay (Article 34 of the GDPR).

IX. Rights of Data Subjects

The data subject has the following rights:

- **the right of access** to personal data and to a copy of the data processed (Article 15 GDPR);
- **the right to rectification** of inaccurate data and completion of incomplete data (Article 16 GDPR);
- **the right to erasure** ("right to be forgotten") (Article 17 GDPR), where the statutory conditions are met, in particular where the purpose of processing has ceased or consent has been withdrawn;
- **the right to restriction of processing** (Article 18 GDPR);

- **the right to be notified** of rectification, erasure or restriction to the recipients of the data (Article 19 GDPR);
- **the right to data portability** in a commonly used, machine-readable format (Article 20 GDPR);
- **the right to object** to processing based on legitimate interests (Article 21 GDPR);
- **the right to withdraw consent** at any time, without affecting the lawfulness of processing carried out before its withdrawal (Article 7(3) GDPR);
- **the right not to be subject to automated decision-making**, including profiling (Article 22 GDPR);
- **the right to lodge a complaint** with a supervisory authority (Article 77 GDPR), **the right to a judicial remedy** (Articles 78 and 79 GDPR), and the right to compensation (Article 82 GDPR and Section 81 et seq. of the Civil Code).

X. Exercise of Rights

Rights may be exercised by e-mail to **contact@dogsitting.cz** or in writing to the Controller's registered office. Before handling a request, the Controller may require verification of the requester's identity (Article 12(6) of the GDPR).

The Controller shall handle the request without undue delay and in any event within **one month** of receipt; taking into account the complexity and number of requests, this period may be extended by a further two months, of which the requester shall be informed in advance (Article 12(3) of the GDPR). Information and actions are provided free of charge; in the case of manifestly unfounded or excessive requests, the Controller may charge a reasonable fee or refuse the request (Article 12(5) of the GDPR).

Upon a request for erasure, the Controller shall erase the data from the local storage and from the cloud storage; backup copies are erased within the regular backup cycles and are excluded from any further processing in the meantime. The Controller is not obliged to erase data to the extent that their processing is necessary for compliance with a legal obligation (in particular the retention of accounting and tax records) or for the establishment, exercise or defence of legal claims (Article 17(3)(b) and (e) of the GDPR). Such data remain stored with restricted access and are erased upon expiry of the relevant period.

XI. Right to Lodge a Complaint

If the data subject considers that the processing of his or her personal data infringes the GDPR or Act No. 110/2019 Coll., he or she has the right to lodge a complaint with the supervisory authority: **Office for Personal Data Protection (Úřad pro ochranu osobních údajů)**, Pplk. Sochora 27, 170 00 Prague 7, Czech Republic, www.uoou.gov.cz.

XII. Automated Decision-Making, Profiling and Marketing

The Controller does not carry out automated individual decision-making or profiling within the meaning of Article 22 of the GDPR. The Controller does not use the personal data of Customers for direct marketing and does not make them available to third parties for marketing purposes.

XIII. Final Provisions

This policy is governed by the laws of the Czech Republic and the law of the European Union. The Controller is entitled to update this policy, in particular following changes in legislation or in the manner of processing; the current version is available to Customers upon request at contact@dogsitting.cz.

This policy is drawn up in the Czech and English languages. In the event of any discrepancy between the language versions, the Czech version shall prevail.