

RICHTIG APPLICATION PRIVACY POLICY

1. GENERAL PROVISIONS

- 1.1. This document (“Privacy Policy”) governs the processing of personal data of visitors, users, and customers (collectively, “data subjects” or “you”) when using the Richtig web application and related services (the “Application”).
- 1.2. The Provider of the Application and the controller of personal data is IBPM Solutions s.r.o., Company ID: 24260169, registered office: #1307/2, Náměstí 14. října, 15000, Prague, Czech Republic, registered with the Municipal Court in Prague under file no. C 198175 (“Provider”, “we”, “us”).
- 1.3. This Privacy Policy is prepared in accordance with the General Data Protection Regulation (GDPR) and applicable Czech legislation.
- 1.4. Definitions from the Main Terms:
 - 1.4.1. “Tenant” means a separate instance of the Application created for a specific Customer (individual or organization). Multiple Tenants may be created for a single entity.
 - 1.4.2. “Object” means any entity recorded in the Application (e.g., document, process, business rule) used for the licensing and pricing model of the Application.

2. SCOPE OF PERSONAL DATA PROCESSING

- 2.1. We process personal data that you voluntarily provide when:
 - 2.1.1. Registering and creating an account in the Application (e.g., first name, last name, email address).
 - 2.1.2. Communicating with customer support or other contact points.
 - 2.1.3. Completing forms or providing additional information (e.g., for Tenant configuration).
- 2.2. We may also process technical data (e.g., IP address, browser data, cookies) that help ensure the functionality and security of the Application.
- 2.3. If you choose to use the Application’s optional AI-based features (“AI Features”), your personal data (e.g., texts, documents, or other files) may be processed by external AI solution providers. Such processing is also subject to their terms and privacy policies. Before activating any AI Feature, you will be informed about the specific provider and given access to their terms. Without your explicit consent, AI Features cannot be used.

3. PURPOSE OF PROCESSING

3.1. We process your personal data primarily for the following purposes:

- 3.1.1. Service delivery: Providing access to and operation of the Application.
- 3.1.2. Billing and payment processing: Managing Service delivery: Providing access to and operation of the Application subscriptions, issuing invoices, and sending payment information.
- 3.1.3. Communication and support: Responding to inquiries, resolving issues, and sending notifications related to the Application.
- 3.1.4. Application improvement: Analyzing usage and user behavior to improve features and functionality.
- 3.1.5. Legal compliance: Such as accounting obligations or responding to statutory requests.

4. LEGAL BASIS

4.1. Your personal data is processed on the following legal bases under GDPR:

- 4.1.1. Performance of a contract (Art. 6(1)(b) of GDPR) – when providing the service, handling payments, etc.
- 4.1.2. Compliance with legal obligations (Art. 6(1)(c) of GDPR) – e.g., accounting or tax requirements.
- 4.1.3. Legitimate interest (Art. 6(1)(f) of GDPR) – ensuring Application operation, protecting our rights and property, conducting analytics.
- 4.1.4. Consent (Art. 6(1)(a) of GDPR) – for specific purposes when required (e.g., certain marketing activities). Consent is voluntary and can be withdrawn at any time.

5. COOKIES AND SIMILAR TECHNOLOGIES

- 5.1. The Application may use cookies to ensure core functionality, personalize content, and analyze usage.
- 5.2. Users will be notified about cookies during their first visit, and cookies can be disabled via browser settings.

6. DATA RETENTION

- 6.1. Personal data is retained for the duration of your account (contractual relationship) and subsequently deleted or anonymized in accordance with Article 10 of the Terms of Use, unless longer retention is required by law (e.g., tax document archiving).

7. RECIPIENTS OF PERSONAL DATA

- 7.1. We may disclose your personal data only to the extent necessary to:
- 7.1.1. External service providers (processors) assisting with IT administration, billing, marketing, etc. These parties may process personal data only under a written data-processing agreement.
 - 7.1.2. Authorities or other authorized entities, where required by law.
- 7.2. We do not transfer your personal data outside the EU/EEA unless necessary. If such a transfer occurs, we will take appropriate measures to ensure adequate protection.
- 7.3. If you activate and use AI Features, certain personal data (e.g., text content) may be shared with external AI technology providers acting as independent controllers or processors. Such sharing occurs only based on your explicit consent and only to the extent necessary for the functionality of the AI Feature. You will always be informed in advance about the AI provider and their data-processing terms.

8. YOUR RIGHTS

- 8.1. Under GDPR, you have the following rights regarding your personal data:
- 8.1.1. Right of access – to request confirmation of processing and obtain a copy of your data.
 - 8.1.2. Right to rectification – to correct or complete inaccurate or incomplete data.
 - 8.1.3. Right to erasure (“right to be forgotten”) – in certain circumstances you can apply for data deletion.
 - 8.1.4. Right to restriction of processing – in specific cases you can request to for eliminate data processing.
 - 8.1.5. Right to object – particularly to processing based on legitimate interest.
 - 8.1.6. Right to data portability – in the case of automated processing carried out on the basis of consent or contract, you can request that we transfer your data to you or another controller in an adequate format.
 - 8.1.7. The right to lodge a complaint – with the supervisory authority (Office for Personal Data Protection) if you found your rights have been violated.

9. DATA SECURITY

- 9.1. We implement and maintain appropriate technical and organizational measures to ensure the security of your personal data and to protect it against accidental or unauthorized access, alteration, destruction, or loss.
- 9.2. Access to personal data is granted only to authorized personnel who need it to perform their job duties.

10. CONTACT DETAILS

- 10.1. For exercising your rights or for any inquiries regarding personal data processing, you can contact us at:
- E-mail: info@richtig.cloud
 - Postal address: IBPM Solutions s.r.o., #1307/2, Náměstí 14. října, 15000, Prague, Czech Republic
- 10.2. If you are not satisfied with our response or believe that your personal data is being processed unlawfully, you have the right to lodge a complaint with the Czech Data Protection Authority (www.uoou.cz).

11. FINAL PROVISIONS

- 11.1. This Privacy Policy is valid and effective as of 1 December 2025.
- 11.2. The Provider may update or amend this Privacy Policy at any time. Updated versions will be published on the website or within the Application. If any changes require your consent, such consent will be requested separately.