

PRIVACY POLICY

AUTOMATO

About the website operator. Automato is a platform that helps its customers choose a vehicle – consultations and assistance, selection, verification of origin and physical inspection. The platform is operated by **Automato s.r.o.**, CRN: 093 17 902, registered office at Bělehradská 858/23, 120 00 Prague 2, registered in the Commercial Register maintained by the Municipal Court in Prague under file No. C 334149 ("we").

Privacy Policy. Protecting your privacy is extremely important to us, which is why we have prepared this Privacy Policy ("Policy") for cases in which we act as personal data controllers. Please read it carefully. This Policy complies with Regulation (EU) 2016/679 of the European Parliament and of the Council, known as the "GDPR", and provides information about what personal data we process, why and how we process it, and how long we will store it.

When do we process your data and in what capacity do we do so? Processing applies to both our customers who use our services and all other users of the website www.automato.cz (the "Website"). However, when you use the Website, we process less information about you (mostly data from cookies). We also process your personal data when we contact you on behalf of our customer with an interest in purchasing an advertised vehicle, or when we perform an inspection. However, as described below, we are not always the controller of personal data in this case – sometimes we act as a processor.

Overview of processing. Since the processing of personal data varies depending on your position in relation to us, we describe the different processing options below. To help you understand – we are controllers when we determine why and how personal data is processed. You can learn about this processing in this Policy. We are processors when our customer determines the "why" and "how" and then transfers the personal data to us to process it according to their instructions. We have a personal data processing agreement with our customer, on the basis of which they transfer this data to us. The processing of personal data only concerns **natural persons**. Data on legal entities (companies) is not personal data.

Who are you?	When do we process data?	What is our position?
Website visitor	When you visit our Website, we process certain information about you that we obtain from cookies.	Personal data controller
Our customer	If you order a service from us, we need to process your personal data in order to provide that service and communicate with you.	Personal data controller

Vehicle sellers (advertisers)	<p>If you are selling a vehicle, we may contact you. The provision of our services also involves contact with vehicle sellers:</p> <ul style="list-style-type: none"> • The selection assistance service includes searching for and recommending suitable vehicles according to the customer's requirements. • The physical inspection or verification of the origin of the vehicle includes inspecting a specific vehicle that our customer is interested in purchasing. 	<p>Personal data processor. The personal data controller is our customer, who determines the purpose and means of processing and instructs us to search for or inspect a vehicle or vehicles.</p>
-------------------------------	---	--

As our customer, please bear in mind that if you provide the personal data of sellers (natural persons), you are the controller of their personal data, and when you order a vehicle inspection or verification of origin, you instruct us to process it. You are also the controller if we assist you in selecting a vehicle (we search for suitable advertisements and communicate with sellers on your behalf).

Do you have any questions? Contact us at info@automato.cz, by telephone at +420 731 081 452, or at the address provided at the beginning of the Policy.

Do we really need your personal data? We always try to limit the extent to which we process your personal data, but sometimes it is unavoidable. If you want to use our services, we need your data so that we can communicate with you. However, we can assure you that we will not process your personal data using automated individual processing that would have legal effects on you as a data subject or significantly affect you in a similar way.

How do we process your personal data? We process your personal data in different ways based on our relationship with you, depending on whether you have concluded a contract with us and use our services, or whether you are browsing our website without any relationship between us.

A. If we provide our services, we process the following personal data:

- **Identification data.** We use this data to identify you when concluding a contract. This includes your first name, surname, address, company registration number and date of birth.
- **Contact details.** We use these to contact you if necessary. These include your telephone number and email address.
- **Billing and banking details.** We process these in connection with identification and payment processing. This includes information appearing on invoices, bank details and information about payments received or sent. Please note, however, that this applies to payments made by bank transfer to our bank account. In the case of card payments, your billing and bank details are processed by the payment gateway provider on our Website as

the controller, and we only receive limited information about the payment. We do not have access to your full credit card number or CVC code. We therefore ask that you please take up any payment issues directly with the payment gateway provider on our Website. The processing of your personal data is governed by the privacy policy of the specific payment gateway provider on our Website.

- **Information included in the contract.** This includes details about the services we provide for you and other details related to our cooperation. It also includes information about your financial capabilities, vehicle preferences, and other information you provide for the successful selection or inspection of a vehicle. If we also search for vehicle insurance offers for you, this may include additional information necessary to verify insurance conditions and arrange insurance (e.g. information about bonus months).
- **Information from our communication.** This mostly concerns information about emails and contact forms, and the content of our communication.

We then process this data for the following purposes and for the following period:

What is the legal basis for processing under the GDPR?	Why do we process your data?	How long will we process it?	What specific data do we process for this purpose?
<p>CONTRACT</p> <p>fulfilment of obligations arising from the contract or in the context of pre-contractual negotiations</p> <p><i>Article 6(1)(b) of the GDPR</i></p>	<p>So that we can conclude a contract with you and provide the services you have ordered. In other words, so that we can perform the ordered vehicle inspection or provide other services.</p>	<p>For the duration of the contract or until all rights and obligations under the contract have expired.</p>	<p>Identification data</p> <p>Contact details</p> <p>Billing and bank details</p> <p>Information contained in the contract</p> <p>Information from our communication</p>
<p>LEGAL REGULATIONS</p> <p>Compliance with legal obligations imposed on us by law</p> <p><i>Article 6(1)(c) of the GDPR</i></p>	<p>To comply with all legal obligations that apply to us.</p>	<p>For the period specified in the specific legal regulation under which we fulfil our obligations</p> <p>For example, we retain personal data related to tax and accounting matters for a period of 10 years from the end of the relevant accounting period (usually the year in which an event significant from a tax and accounting perspective occurred, i.e. in particular the provision of our services).</p>	<p>Identification data</p> <p>Contact details</p> <p>Billing and bank details</p> <p>Information contained in the contract</p>

<p>LEGITIMATE INTEREST</p> <p>it is in our legitimate interest</p> <p><i>Article 6(1)(f) of the GDPR</i></p>	<p>So that we can protect and enforce our claims.</p>	<p>For up to 16 years. This is the longest possible limitation period stipulated by law + the time that the court may need to inform us of a lawsuit filed by you. We set this at 1 year.</p> <p>Longer processing on our part is possible in the event of legal proceedings that continue after the end of the aforementioned period (16 years). In this case, we may continue processing.</p>	<p>Identification data</p> <p>Billing and bank details</p> <p>Information contained in the contract</p> <p>Information from our communication</p>
	<p>So that we can improve our services and conduct surveys on your satisfaction with our services.</p>	<p>For a period of 1 year after the end of the contract.</p>	<p>Contact details</p> <p>Information contained in the contract</p> <p>Information from our communication</p>
	<p>So that we can send you newsletters.</p>	<p>For a period of 3 years from the conclusion of the last contract between us, or until you object to this processing, e.g. by unsubscribing from our newsletters.</p>	<p>Contact details</p>
<p>CONSENT</p> <p>We process data based on your consent.</p> <p><i>Article 6(1)(a) of the GDPR</i></p>	<p>In order to process your data, the processing of which cannot be subsumed under any of the above-described legal grounds for data processing</p>	<p>For the duration of your consent.</p> <p>You can withdraw your consent at any time, e.g. by email. However, even if you withdraw your consent or the period of consent expires, this does not mean that we must erase all your data that we have processed on the basis of your consent. We may continue to process data for which we have</p>	<p>Data specified in the consent to the processing of personal data</p>

		another legal basis. If you withdraw your consent, this is without prejudice to the lawfulness of the processing of personal data prior to its withdrawal	
--	--	---	--

B. If you contact us via the contact form or by other means, we process the following personal data:

- **Identification data.** We use this to identify you, e.g. when responding to your enquiry. This includes your first name, surname, address and company registration number.
- **Contact details.** We use these to contact you if necessary. These include your telephone number and email address.
- **Information from our communication.** This mostly concerns information in emails, information in contact forms, and the content of our communication.

We then process this data for the following purposes and for the following period:

What is the legal basis for processing under the GDPR?	Why do we process your data?	How long will we process it?	What specific data do we process for this purpose?
LEGITIMATE INTEREST it is in our legitimate interest <i>Article 6(1)(f) of the GDPR</i>	So that we can respond to your enquiry.	1 year after our last contact with you	Contact details Information from our communication
PRE-CONTRACTUAL NEGOTIATIONS so that we can negotiate the terms of the contract with you <i>Article 6(1)(b) of the GDPR</i>	So that we can conclude a contract with you.	1 year after our last contact with you, unless we conclude a contract with you – in which case we will continue to process your data in accordance with the table above in point A.	Contact details Identification Information from our communication

C. When you browse our website, we process the following personal data:

- **Contact details.** We use these so that we can contact you if necessary. These include your telephone number and email address.
- **Cookies.** We use cookies for the operation and functioning of the Website.

We then process this data for the following purposes and for the following period:

What is the legal basis for processing under the GDPR?	Why do we process your data?	How long will we process it?	What specific data do we process for this purpose?
<p>CONSENT</p> <p>We process data based on your consent</p> <p><i>Article 6(1)(a) of the GDPR</i></p>	<p>To send you newsletters, if we offer this option on the Website</p>	<p>For the duration of your consent.</p> <p>You can withdraw your consent at any time, e.g. by email. However, even if you withdraw your consent or the period of consent expires, this does not mean that we must erase all your data that we have processed on the basis of your consent. We may continue to process data for which we have another legal basis. If you withdraw your consent, this is without prejudice to the lawfulness of the processing of personal data prior to its withdrawal.</p>	<p>Contact details</p>
<p>MISCELLANEOUS</p> <p>For more information, see the section of this Policy that deals with cookies.</p>	<p>To keep track of how you use our Website, where you come from, and which of our services interest you the most</p>	<p>For more information, see the section of this Policy that deals with cookies.</p>	

Processing of sellers' personal data

If you sell a vehicle and we recommend it to our customer, or contact you on their behalf regarding the availability and technical condition of the vehicle, the customer, as the controller, processes the following data. Please note that in this relationship, we act as personal data processors.

- **Identification data.** This is used to identify you; it includes your first name, surname, address and company registration number.
- **Contact details.** We use these to contact you on behalf of the customer if necessary. These include your telephone number and email address.

- **Information available in your advertisement and in communication.** This mostly concerns information that you publish about yourself in an advertisement or provide in emails or other communication. In addition to the identification and contact details mentioned above, this mostly concerns information about the vehicle, which may be personal data (e.g. VIN code and vehicle registration number).

What is the legal basis for processing under the GDPR?	Why do we process your data?	How long will we process it?	What specific data do we process for this purpose?
<p>PRE-CONTRACTUAL NEGOTIATIONS</p> <p>so that we can negotiate the terms of the contract with you and contact you to verify the availability and technical condition of the vehicle</p> <p><i>Article 6(1)(b) of the GDPR</i></p>	<p>So that our customer can conclude a contract with you.</p>	<p>1 year after the last contact with you</p>	<p>Contact details</p> <p>Identification</p> <p>Information available in your advertisement and in communication</p>

Who do we share your personal data with?

We may also pass on your data to other entities, especially to ensure our effective functioning.

Our service providers therefore commonly become processors of your personal data. However, they are only authorised to process your personal data to the extent agreed with them.

We specifically pass on your personal data to the following entities:

- **Our customers.** If you are selling a vehicle, we will pass on your personal data to our customers if we believe your offer to be suitable for our customer.
- **Cooperating technicians.** Vehicles and motorcycles are inspected by technicians who are our contractual suppliers. We must transfer personal data to them so that they can arrange the details of the inspection process with you.
- **Sellers of vehicles you are interested in purchasing.** If connecting you with these individuals is part of our services, we do not need your consent to pass on your data. In other cases, your consent is required.
- **Accountants and other advisors (e.g. solicitors)**
- **The operator and administrator of our website**
- **Google Ireland Ltd,** which operates the marketing tools Google Analytics, Google Ads and Google Tag Manager. Information on how Google processes your personal data can be found [here](#).
- **Other providers of marketing and advertising tools** such as Seznam.cz, a.s. and Meta Platforms Inc.
- **Companies providing information about vehicles and their history.** These include the Cebia and Vincario registers, providers of electronic service books, operational or financial leasing, and other databases.

We may also transfer your personal data to public authorities if it is in our interest, or if they request it.

Where will we transfer your personal data?

Because we use advanced tools to improve our Website, some of your personal data may be transferred to third countries outside the European Union. However, we always transfer such personal data in compliance with all standards for due care for personal data and provided that the recipient of your personal data has provided adequate guarantees for the protection of personal data.

What are your rights in relation to the processing of personal data?

You have the right to object if we process your personal data on the basis of our legitimate interest. This objection can be raised by sending a letter to our contact address or by email to info@automato.cz. We will evaluate it within one month of receipt at the latest. You can use a similar method to exercise other rights. You can also withdraw your consent to the processing of personal data in the same way.

In connection with the processing of personal data, you also have the following rights:

- You have the right to ask us whether we are processing your personal data. If so, you have the right to access this personal data and find out what personal data is involved. You also have the right to request a copy of your personal data. We will provide the first copy free of charge, and any further copies after payment of the necessary costs of production.
- You may request that we rectify incorrect data or complete incomplete data.
- Under certain conditions, we are also obliged to erase your personal data or restrict its processing if you request us to do so, and you also have the right to transfer your personal data to another controller.
- If you suspect that your personal data is being processed unlawfully, you can lodge a complaint with the Office for Personal Data Protection, <https://uouu.gov.cz>, address: Pplk. Sochora 27, 170 00 Prague 7.

What about cookies?

We use cookies to ensure the proper functioning of the Website. We classify cookies as necessary, functional, analytical and marketing cookies. You can find a list of the specific cookies we use in our cookie bar [here](#).

Essential cookies are necessary for the Website's proper functioning. We do not require your consent to use these cookies. It is in our legitimate interest to ensure that the Website functions properly – e.g. that it displays correctly on your device.

Functional cookies ensure that the Website is displayed according to your preferences. The use of these cookies allows us to improve your user experience and tailor the content to suit your needs. We need your consent to use them. You can refuse these cookies at any time by clicking the link above.

Analytical cookies are used to compile statistics and reports. We use them to monitor Website traffic and where you came to the Website from. We need your consent to use them. Again, you can refuse them at any time by clicking the link above.

Marketing cookies enable us to offer our products through targeted advertising. However, we need your consent to do so. You can refuse these cookies by clicking the link above. If you consent to marketing cookies, we may share your data with our partners who operate advertising tools or social networks for the potential storage of cookies in your browser, remarketing, targeting personalised advertising and linking to other information you have provided to the tools.

This Policy is effective from 10 November 2025.