

PRIVACY POLICY

Effective date: April 08, 2026

This Privacy Policy explains how Varnesn s.r.o. (“**Varnesn**”, “**Company**”, “**we**”, “**us**” or “**our**”) collects, uses, stores, discloses and otherwise processes personal data in connection with varnesn-ads.com and related interactions concerning the Website.

For the purposes of applicable data protection law, the controller of personal data described in this Privacy Policy is Varnesn s.r.o., Moskevská 1464/61, Vršovice, 101 00 Prague 10, Czech Republic, company ID No.: 28666151.

This Privacy Policy applies to personal data collected through the Website, through Website inquiry or contact functionality, and through communications that arise directly from a Website-based inquiry.

1. Scope of this Privacy Policy

This Privacy Policy covers personal data relating to:

- (a) visitors to the Website;
- (b) individuals who submit inquiries, request offers or otherwise contact us via the Website;
- (c) representatives, employees or contractors of prospective clients, existing clients, suppliers or partners where the interaction began through the Website or is directly connected to it.

This Privacy Policy does not automatically govern all personal data processing carried out by the Company in the context of a separate client engagement, employment relationship, or standalone contractual relationship where a more specific privacy notice is provided.

2. Personal data we may collect

Depending on how you interact with the Website, we may collect the following categories of personal data.

2.1 Data you provide directly

If you contact us through the Website, request an offer, or otherwise communicate with us, we may collect:

- your e-mail address;
- your name, company name, job title or business role, if you provide them;
- the content of your inquiry, message, brief, request, attachment or communication;
- any business contact details you choose to provide;
- records of our communications with you.

At the time of review, the Website appears to request at least an e-mail address in the “Get offer” form. If you provide additional details voluntarily, we may process those details as well.

2.2 Data collected automatically

When you visit the Website, we may automatically collect technical and usage-related information such as:

- IP address;
- browser type and version;
- device type and operating system;
- language and general configuration data;
- date and time of access;
- pages visited, navigation path and interaction data;
- referring URL or source;
- basic log data, error reports and security-related event information;
- cookie identifiers or similar online identifiers, where used.

2.3 Data from other sources

Where relevant to a legitimate business inquiry, we may receive limited business contact information from publicly available corporate sources, professional networking sources, service providers, or persons acting on behalf of your organisation.

We do not seek to collect special categories of personal data through the Website. Please do not submit sensitive personal data through the Website unless we have specifically requested it and there is a valid legal basis for doing so.

3. How and why we use personal data

We process personal data only where we have an appropriate legal basis under applicable law. Depending on the context, our legal bases may include:

- performance of steps at your request prior to entering into a contract;
- performance of a contract;
- our legitimate interests;
- your consent;
- compliance with legal obligations.

We may use personal data for the following purposes:

3.1 To operate and administer the Website

We use technical and usage data to make the Website available, maintain functionality, manage hosting, monitor performance, troubleshoot errors, protect the Website, prevent misuse, and improve reliability and user experience.

Legal basis: legitimate interests in operating and securing our Website; where required, consent for non-essential cookies or analytics.

3.2 To respond to inquiries and provide information

We use contact and communication data to review your request, communicate with you, answer questions, assess possible cooperation, prepare proposals, and take steps requested by you before any contract is entered into.

Legal basis: pre-contractual steps taken at your request; legitimate interests in managing business communications.

3.3 To manage business relationships

If your inquiry develops into further business discussions, we may use personal data to organise meetings, evaluate a potential engagement, conduct internal review, negotiate terms, and manage the prospective relationship.

Legal basis: pre-contractual steps; legitimate interests in business development and relationship management.

3.4 To comply with law and protect rights

We may process personal data where necessary to comply with legal, regulatory, tax, accounting, compliance, anti-fraud, cybersecurity, sanctions, court or governmental requirements, or where necessary to establish, exercise or defend legal claims.

Legal basis: legal obligation; legitimate interests in legal protection and corporate compliance.

3.5 To send business communications

We may send you service-related, transactional or inquiry-related communications where necessary to deal with your request.

If we send marketing communications, newsletters or updates, we will do so only where we have a lawful basis to do so, such as your consent or another basis permitted by applicable law. You may opt out of marketing communications at any time.

Legal basis: consent where required; legitimate interests in promoting our business where lawful.

4. Cookies and similar technologies

The Website may use cookies and similar technologies for technical, security, preference, analytics or related purposes.

Cookies are small text files stored on your device when you visit a website. Some cookies are necessary for the operation and security of a website. Other cookies may be used for analytics, performance measurement, remembering preferences, or loading third-party content.

Where required by applicable law:

- essential cookies may be used without consent to the extent strictly necessary for the Website to function properly; and
- non-essential cookies, such as analytics, preference or marketing cookies, should be used only after valid user consent has been obtained.

You can usually control cookies through your browser settings and, where implemented, through the Website's consent management interface.

Blocking or deleting certain cookies may affect Website functionality.

5. Disclosure of personal data

We do not disclose personal data on an unrestricted basis. We may disclose personal data only where necessary and appropriate to the purposes described in this Privacy Policy, including to:

- hosting, infrastructure, website maintenance, security and IT support providers;
- providers of analytics, contact management, CRM, communications, e-mail delivery or similar tools, where actually used by us;
- professional advisers such as lawyers, auditors, accountants or insurers where necessary for legitimate business or legal purposes;
- courts, regulators, law enforcement authorities or public bodies where required by law or where necessary to protect rights, safety or legal claims;
- actual or potential buyers, investors, lenders, advisers or transaction counterparties in connection with a merger, acquisition, restructuring, financing, sale of assets or similar corporate event, subject to appropriate confidentiality protections.

Where recipients process personal data on our behalf, we expect them to act under appropriate contractual and legal safeguards.

6. International transfers

Our service providers or business partners may process personal data in countries outside the European Economic Area or outside the country in which you are located.

Where we transfer personal data internationally, we will do so only where there is an appropriate legal mechanism in place under applicable law, such as an adequacy decision, standard contractual clauses, or another recognised safeguard or derogation.

7. Data retention

We retain personal data only for as long as reasonably necessary for the purposes for which it was collected, including for legal, compliance, evidentiary and record-keeping purposes.

Retention periods depend on the nature of the data and the reason for processing. In general:

- Website technical and log data are retained for as long as reasonably necessary for security, performance, troubleshooting and administrative purposes;
- inquiry and communication data are retained for as long as needed to respond to the inquiry, manage follow-up communications, assess potential cooperation, and protect our legal interests;
- where communications lead to a contract or business relationship, relevant data may be retained for the duration of that relationship and thereafter for as long as required by law or reasonably necessary for accounting, tax, audit, compliance and legal claims purposes;
- marketing records are retained until you opt out, withdraw consent, or until we determine that the data is no longer needed for lawful business communications.

When personal data is no longer required, we will delete it, anonymise it, or securely archive it as appropriate and permitted by law.

8. Data security

We use reasonable technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful forms of processing.

However, no website, transmission method, storage environment or technical system can be guaranteed to be completely secure. You therefore provide data through the Website at your own risk to the extent permitted by law.

9. Your rights

Subject to applicable law, you may have the right to:

- request information about how your personal data is processed;
- access personal data we hold about you;
- request correction of inaccurate or incomplete personal data;
- request deletion of personal data in certain circumstances;
- request restriction of processing in certain circumstances;
- object to processing based on legitimate interests, including objection to direct marketing;
- withdraw consent at any time where processing is based on consent;
- receive personal data in a structured, commonly used and machine-readable format, and request transfer to another controller where the legal conditions for portability are met;
- lodge a complaint with a competent data protection authority.

If you wish to exercise any of your rights, please contact us using the contact details set out below.

We may need to verify your identity before responding to a request. We may also refuse or limit a request to the extent permitted by applicable law, for example where the request is manifestly unfounded, excessive, or where legal exemptions apply.

10. Marketing communications

If you receive marketing communications from us, you may opt out at any time by using the unsubscribe mechanism included in the message, where available, or by contacting us directly.

Opting out of marketing communications does not affect service-related or inquiry-related communications that are necessary for the handling of your request or an existing business relationship.

11. Third-party websites and embedded content

The Website may contain links to third-party websites, platforms or content. This Privacy Policy does not apply to third-party websites or services that we do not control.

If you follow a third-party link or interact with third-party content, your personal data will be subject to the privacy practices of that third party.

You should review the privacy policy of any third-party site or service you use.

12. Children

The Website is intended for business and professional use and is not directed to children.

We do not knowingly collect personal data from children through the Website. If you believe that a child has provided personal data to us through the Website, please contact us so that we can take appropriate steps.

13. Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect legal, technical, operational or business changes.

The latest version published on the Website will apply. We encourage you to review this Privacy Policy periodically.

If required by applicable law, we will provide additional notice of material changes.

14. Contact us

If you have questions about this Privacy Policy or want to exercise your rights, please contact:

Varnesn s.r.o.

Moskevská 1464/61, Vršovice

101 00 Prague 10

Czech Republic

Company ID No.: 28666151

E-mail: privacy@varnesn-ads.com