

Privacy Policy (GDPR, EN)

Version 2026-04-01

1. Data Controller

- HOOKAH GARAGE s.r.o.
- Registered office: Dobrovského 874/29, 702 00 Ostrava, Czech Republic
- Company No. (IČO): 08997608
- VAT No. (DIČ): CZ08997608
- Contact e-mail: office@titaniumcarcare.eu

2. Categories of Personal Data Processed

- Identification data: first name, surname, company name, company registration number, VAT number.
- Contact data: e-mail, phone number, delivery/billing address.
- Order data: order contents, purchase history, payment and delivery information.
- Communication data: enquiries, complaints, customer support.
- Technical data: IP address, device data, access logs, consent and document-acceptance records.
- Login verification data: a one-time code (stored as a cryptographic hash) and an associated challenge token, generated when the customer opts in to email login verification (MFA).

3. Purposes and Legal Bases

- Conclusion and performance of the purchase contract: Art. 6(1)(b) GDPR.
- Compliance with legal obligations (accounting, taxes): Art. 6(1)(c) GDPR.
- Legitimate interests (security, fraud prevention, enforcement of claims): Art. 6(1)(f) GDPR.
- Direct marketing (newsletter): Art. 6(1)(a) GDPR (consent).
- Email login verification (one-time code): Art. 6(1)(b) GDPR (performance of contract / account security as part of the service). The customer opts in voluntarily and may opt out at any time in their account settings.

4. Categories of Data Subjects

- B2C customers (consumers).
- B2B customers and their authorised contact persons.
- Prospective customers (leads, newsletter subscribers).

5. Recipients and Processors

- **Carriers and logistics partners:** Geis CZ s.r.o., GLS Czech Republic s.r.o., Zásilkovna s.r.o. (Paketka) and any other contracted carriers – the recipient's name, delivery address and phone number are passed to the selected carrier solely for the purpose of delivering the parcel. Legal basis: Art. 6(1)(b) GDPR (performance of contract).
- **Payment service providers:** ComGate Payments, a.s. (payment gateway for card payments, bank transfers and BLIK) – personal and payment data are processed in accordance with ComGate's terms and privacy policy.
- **IT infrastructure, hosting, e-mail and support tool providers** (to the extent necessary for operating the e-shop and ERP system).
- **Accounting, tax or legal advisors** (to the necessary extent).
- **Public authorities**, where required by law.

6. Transfers Outside the EEA

- Where personal data are transferred outside the EEA, the controller ensures appropriate safeguards under the GDPR (e.g. Standard Contractual Clauses).

7. Retention Periods

- **Contract-related data** (orders, delivery and billing data): for the duration of the contractual relationship and a further **3 years** after its termination for the purpose of protecting legal claims (limitation period).
- **Accounting and tax documents** (invoices, tax documents): **5 years** from the end of the tax period in which the obligation to issue them arose.
- **Marketing consents** (newsletter): until consent is withdrawn; consent records are retained for **3 years** after withdrawal as proof of lawful processing.
- **Audit data on terms acceptance** (especially B2B): **5 years** after the end of the contractual relationship.
- **Technical logs and security records**: maximum **12 months** from their creation, unless otherwise required by law.
- **Login verification codes** (email MFA): the code hash and challenge token are automatically and permanently deleted within **10 minutes** of generation, regardless of whether the code was used.
- **Deleted customer/account records (B2C and B2B)**: where legal retention obligations still apply (especially accounting/tax or enforceable claims), records are first **anonymised/pseudonymised** (soft delete) and hidden from standard operational views; identifying data are permanently removed once the applicable legal retention period expires.

8. Rights of Data Subjects

- Right of access to personal data.
- Right to rectification of inaccurate data.

- Right to erasure, where GDPR conditions are met.
- If immediate full erasure conflicts with legal obligations (e.g. accounting/tax), processing is restricted to minimum necessary data and personal identifiers are anonymised until lawful retention expires.
- Right to restriction of processing.
- Right to data portability.
- Right to object to processing.
- Right to lodge a complaint with the Czech Data Protection Authority (ÚOOÚ), www.uoou.cz.

8a. Withdrawal of Marketing Consent

- You may withdraw consent to receive marketing communications (newsletter) at any time, in particular via the unsubscribe link in the e-mail or by contacting the controller.
- Withdrawal is free of charge and effective for the future; it does not affect the lawfulness of processing prior to withdrawal.
- Withdrawal of marketing consent does not affect the sending of transactional messages necessary for the performance of the contract (e.g. order confirmation, invoicing and status e-mails).

9. Cookies and Online Identifiers

- The website may use technical and functional cookies.
- Details are set out in the separate Cookie Policy document.

10. Data Security

- The controller implements appropriate technical and organisational measures (access control, logging, backup, encryption where appropriate).
- Access to data is restricted to persons who need it to perform their work duties.

11. Automated Decision-Making

- The controller does not, as a standard practice, carry out decision-making based solely on automated processing that would have legal effects on data subjects, unless explicitly stated otherwise.

12. Contact and Policy Updates

- Questions and requests regarding data protection should be sent to: office@titaniumcarcare.eu.
- These policies may be updated reasonably; the current version is published in the e-shop.