

**Principles of the processing of personal data by  
Two beards LLC, ID Number: 47-3749160, with its registered office  
at 69 Charlton Street, 100 14 New York, NY, USA**

Our company, Two beards LLC, offers products and provides related services exclusively in the territory of the United States of America. We work to promote our business interests by looking for various options of cooperation and we cooperate with entities from the European Union.

When processing personal data of our cooperating entities, we handle the personal data in accordance with valid and effective legal regulations, namely in accordance with 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, and repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter the “**GDPR**”).

These principles constitute a generally applicable document concerning the protection and the processing of personal data of natural persons (hereinafter the “**data subjects**”). Herein below, we provide to you, the data subject, information on the processing of personal data regardless of whether the personal data are collected from you, the data subject (Article 13(1) of the GDPR), or whether the personal data have not been obtained from you, the data subject (Article 14(1) of the GDPR).

**I. Identity and contact details of the controllers**

**Controller number 1:**

**Two beards LLC**

ID Number: 47-3749160

With its registered office at: 69 Charlton Street, 100 14 New York, NY, USA

**Controller number 2:**

**Martina Červenková**

Recruitment & Community Lead at FigurePOS

Cyrilská 7, 602 00, Brno

Phone: +420 602 585 152

E-mail: [martina@figurepos.com](mailto:martina@figurepos.com)

Controller number 1 and Controller number 2 together or individually, further only as Controller or Controllers.

The Controller has not appointed any data protection officer.

## **II. The purposes of the processing of personal data concerning you by the Controller and the legal basis for the processing**

The legal basis for the processing of personal data concerning you is to comply with our rights and obligations. We process personal data to the extent strictly necessary and for as long as strictly necessary for the processing purposes. The processing of personal data is divided into two categories – without your consent and with your consent. The legal basis for the processing of personal data concerning you for which we do not need your consent is as follows:

- for compliance with our obligations arising from signed contracts;
- for compliance with our obligations vested in us by special legal regulations;
- to protect interests which are essential for the life of the data subject or that of another natural person;
- for the performance of a task carried out in the public interest;
- due to our legitimate interest or that of a third party (our legitimate interests include facilitating of communication with the data subject in relation to identification and contact personal data, as well as exercising our rights and asserting of our claims in litigations and vis-a-vis health and commercial insurers).

If it is impossible to process personal data concerning you based on any of the above specified legal titles, we will need your consent for their processing for one or several specific purposes.

## **III. The period for which personal data concerning you are kept by the Company**

We keep personal data concerning you only for a period limited to a strict minimum as we are required by legal regulations, or as long as our legitimate interest to keep such data exists.

The personal data are processed as long as our legitimate interest, contractual relationship or another legal title exists that enables us to process personal data concerning you. It means that we have set strict by-laws to verify both legality and duration of keeping personal data concerning you. Having lost the legitimate interest for the processing, we delete personal data concerning you.

The personal data that we process with your consent are kept only as long as the purpose for which your consent was acquired exists.

## **IV. Your rights related to personal data protection**

Personal data concerning you are processed in a transparent way and in compliance with applicable legal regulations. Nevertheless, you have the right to contact us at any time to obtain information about the processing of personal data concerning you or in order to exercise the below specified rights related to the personal data.

### **Right of access to personal data concerning you**

You have the right to ask for a copy of the personal data concerning you undergoing processing by the Controller.

**Right to have personal data rectified**

If you believe that personal data that we keep about you are inaccurate or incomplete, you have the right to have the personal data concerning you updated or completed.

**Right to have personal data erased (“right to be forgotten”)**

You have the right to obtain the erasure of personal data concerning you if no longer necessary in relation to the purpose for which they were processed, if you withdrew your consent on which the processing was based, if that data have been unlawfully processed or if they have to be erased for compliance with a legal obligation.

**Right to restriction of the processing of personal data**

You have the right to obtain restriction of processing if you contest the accuracy of personal data concerning you, if their processing is unlawful but you oppose the erasure of such personal data, or, should you so demand, we may process personal data concerning you even if no longer needed for the purpose for which they had been provided to the Controller (e.g. for the exercise of a legal claim in a court for which you need the personal data that we process), or if you raised an objection against the processing and it is not clear whether our legitimate interest overrides your legitimate interests.

**Right to object to the processing of personal data**

You have the right to object at any time to the processing of personal data concerning you, including profiling that we perform for a legitimate interest. You are also entitled to raise an objection against processing where we process personal data concerning you for direct marketing purposes. In such case we shall not process personal data concerning you for that purpose.

**Right to personal data portability**

Where the processing of personal data is carried out by automated means based on a signed contract or a consent awarded by you to our Company, you have the right to portability of the personal data to be provided to you in a structured, commonly used and machine-readable format.

**Right to withdraw consent with the processing of personal data**

If you gave us your consent with the processing of personal data for the purposes that require such consent, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of personal data processing based on consent before its withdrawal. We shall respond to your requests concerning the exercise of your rights without undue delay after receiving your request.

**Right to lodge a complaint with a supervisory authority**

You shall have the right to lodge a complaint with a supervisory authority (The Office for Personal Data Protection) if you consider that the rights of personal data protection have been infringed as a result of the processing of personal data concerning you. Contact details of the supervisory authority are as follows:

The Office for Personal Data Protection  
Praha 7, Pplk. Sochora 27, Post code 170 00, Czech Republic  
Phone: +420 234 665 111  
Data box ID: qkbaa2n

WWW: <https://www.uoou.cz>

E-mail: [posta@uoou.cz](mailto:posta@uoou.cz)

## V. Categories of concerned personal data

Categories of concerned personal data are divided based on the legal relationship between the Controller and you. To make your life easier, we have prepared a simple table for you with a detailed description of the concerned personal data that we process.

Categories of data subjects	Purpose of personal data processing	Legal basis and processed personal data	Duration of the processing	Transfer of personal data to third parties
Contractors	Performance and implementation of contracts entered into with our contractors.	The legal basis is <b>the performance of a contract</b> .  Identifiers (name, surname, title, date of birth, permanent residence, temporary residence, billing address, mailing address, e-mail, phone number, business ID, tax ID, bank account number, signature).	For that purpose, personal data can be processed for as long as the contractual relationship and the warranty period last.	The personal data are not transferred to third parties.
	Assertion of claims arising from contractual relationships following termination of the contract	The legal basis is <b>our legitimate interest</b> consisting of the right to recover receivables, seek damages and assert other claims that might have arisen during our legal relationship.  Identifiers (name, surname, title, date of birth, permanent residence, temporary residence, billing address, mailing address, e-mail, phone number, business ID, tax ID, bank account number, signature).	For that purpose, personal data can be processed for a period of three years after the termination of the contractual relationship, or, in the event of litigation, throughout the entire proceedings.	Your personal data can be transferred to third parties, i.e. our legal representatives, for the purpose of asserting our rights.
	Compliance with our obligations related to bookkeeping and taxes	The legal basis is compliance with <b>the legal obligation</b> imposed on us by legal regulations governing bookkeeping and paying of taxes.  Identifiers (name, surname), contact details (mailing address or permanent residence address, e-mail, phone number), bookkeeping data (bank account number and other information in tax documents).	For that purpose, personal data can be processed for a period stipulated by applicable legal regulations.	Your personal data can be transferred to third parties, i.e. our tax consultants and outsourced accountants, for the purpose of

				technical consultations.
<b>Potential contractors</b>	Keeping records of potential contractors	The legal basis is <b>our legitimate interest</b> consisting of the right to expand our network of potential contractors.  Identifiers (name, surname, title, date of birth, permanent residence, temporary residence, billing address, mailing address, e-mail, phone number, business ID, tax ID, bank account number, signature).	For that purpose, personal data can be processed until the data subject objects pursuant to Art. 21(2) of the GDPR.	Your personal data can be transferred to third parties as follows providers of cloud services.

## VI. Transfer of personal data to third countries

Company Two beards LLC, offers products and provides related services exclusively in the territory of the United States of America. In order to expand our network of potential contractors, our company collects personal data from potential contractors from the European Union whose personal data are processed outside of the European Union. I.e. your personal data are transferred to third countries outside of the EU. Specifically, we are referring to cloud services (data storage) by competent contractors. However, such transfers always take place in accordance with GDPR and with a high level of protection of your personal data security.

Where personal data is shared between the Controllers, it is based on contracts the content of which is given in particular by the standard contractual clauses resulting from the [Commission Decision of 15 June 2001](#) on standard contractual clauses for the transfer of personal data to the third countries under Directive 95/46/EC or Commission Decision of 27 December 2004 amending Decision 2001/497/EC as regards the implementation of an alternative set of standard contractual clauses for the transfer of personal data to third countries.