

Vrgineers Privacy Policy

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This is the **Privacy Policy** of **Vrgineers, Inc.**, which operates through its registered branch Vrgineers, Inc., odštěpný závod, Jankovcova 1037/49, 170 00 Prague, Czechia ("**Vrgineers**" or "**we**"). Vrgineers develops and sells VR headsets and other equipment and provides various ancillary services, such as consulting, implementation or training and may organize or partner with various events (together "**Services**").

SCOPE OF THIS PRIVACY POLICY

This Privacy Policy describes how Vrgineers as the data controller collects and uses your personal data if you are doing business with us or otherwise deal with us, if you show an interest in our Services, for example by subscribing for our newsletter, if you apply for a job with us or if you visit our websites ("**you**"). This document also provides you with important information about your rights.

PERSONAL DATA WE COLLECT

Data that you provide to us:

- When you negotiate or transact with us, we ask you to provide certain personal data to identify you and your company and to be able to communicate with you and your company. These data may include your name, email address, company and your position and other information. We need this data to be able to negotiate and transact with you and your company.
- When you subscribe to our newsletter, we collect and use your email address which you provide on a voluntary basis.
- We ask for and collect personal data such as your name, address, phone number and email address when you register for or attend an event organized by us. We will make it clear in case some data is collected on a voluntary basis. In absence of such information, the provision of the information is needed for you to attend the event.
- When you apply for a job with us, we process your data which you gave us (usually your CV) and data which you published (such as your LinkedIn or Facebook profile). Such processing qualifies as steps prior to entering into a contract.

Cookies

Vrgineers and third parties identified in Third Parties' Policies below, may use cookies, local storage, and other storage technologies ("**Cookies**") to store or collect information in or from your browser or device and use that information for the following purposes:

- For the operation of our websites. We don't need your consent for such use of these so-called **Essential Cookies**, as we need these to operate our website.
- To analyze and improve the performance of our website and marketing. We only use such so-called **Non-Essential Cookies** if you allow us to do so via the Cookies Consent on our website. You can withdraw your consent at your will via the Cookies Consent on our website.

Third Parties' Policies related to Cookies

Google's [terms for use of cookies](#), and [information on opt-out](#) for Google Marketing Platform Google Analytics.

Facebook's [data policy](#) relevant for Facebook pixel.

LinkedIn pixels and ads [privacy policy and opt-outs](#).
X (formerly Twitter) [cookies policy](#).

HOW WE USE THE DATA – PURPOSE OF DATA PROCESSING

We use the personal data which we collect from you to:

- negotiate regarding your business or other engagement (including employment) with us;
- provide the Services;
- improve the Services;
- send promotional communications, such as providing you with information about products and services, features, surveys, newsletters, offers, promotions, contests, and events; and provide other news or information about us and our partners;
- comply with our legal obligations, including our obligations related to personal data protection;
- We use Cookies for purposes identified in the “Cookies” section.

DATA SHARING AND TRANSFERS

We may share your personal data with our affiliates and third-party service providers to provide data-warehousing, development, analytics and other services for us. These third-party service providers may have access to or process your personal data for the purpose of providing these services for us. We do not permit our third-party service providers to use the personal data that we share with them for their marketing purposes or for any other purpose than in connection with the services they provide to us. By default, we and our service provider process your personal data only within the EU. If the data are exceptionally transferred outside the EU, we do so in accordance with applicable laws and we rely either on [adequacy decisions](#) for the relevant countries, or other transfer mechanisms as may be available under applicable law, such as the [Standard Contractual Clauses](#).

SECURITY OF YOUR PERSONAL DATA

We take reasonable and appropriate steps to protect your personal data in an effort to prevent loss, misuse, and unauthorized access, disclosure, alteration and destruction.

LEGAL GROUNDS FOR PROCESSING (IF YOU RESIDE IN EEA, UK OR SWITZERLAND)

We process your data for the purposes described in this Privacy Policy, based on the following legal grounds:

- When we’re pursuing legitimate interests:
- We process your information for our legitimate interests and those of third parties. This means that we process your information for negotiating the and providing the Services (in case you are not a party to the underlying contract), improving the Services; sending promotional communication; operating our websites (Essential Cookies only).
- When it is necessary for the performance of our contract with you or in order to take steps before such contract:
- We process your data to provide the Services you’ve asked for under a contract between you and us. This means that we process your information for things like: Delivering your ordered goods or providing you with other Services; processing transactions, and sending you related information. We process your data when negotiating about your employment with us.

- When we're complying with legal obligations:
- We'll process your data when we have a legal obligation to do so, for example, if we're responding to a legal process or an enforceable governmental request.
- With your consent:
- We may ask for your agreement to process your information for specific purposes and you have the right to withdraw your consent at any time. For example, we use Non-Essential Cookies only with your consent. If you register for our newsletter without being our customer, you give us a consent to process your data for the purpose of sending you such promotional communications.

If you wish to withdraw your consent, you can use the provided link or you can contact us at privacy@vrgineers.com;

YOUR RIGHTS (IF YOU RESIDE IN EEA, UK OR SWITZERLAND)

To the extent that available by data protection is applicable to you (such as the [GDPR](#)), you may exercise the following rights:

- you may request access to your data from us (information about what your specific data we process and how do we work with them);
- you may request restriction of the processing your data (which means that we do not delete the data but we will not work with them);
- you may request data deletion and correction (always if the legal conditions are met); and
- you may object to the processing of data – it means that you may refuse data processing based on a legitimate interest and we will limit processing, unless we prove serious and qualified legitimate reasons for the processing. To exercise any of these rights, contact us via above mentioned contact details - the easiest way is to send us an email to privacy@vrgineers.com and we would be glad to help you exercise your rights. If you believe that we are violating legal rules by processing your personal data, you have the right to lodge a complaint with the national supervising authority ([Czech Office for Personal Data Protection](#)).

You can opt-out of receiving newsletters by clicking on the "unsubscribe" link located on the bottom of our newsletters you may send a request to privacy@vrgineers.com.

CALIFORNIA RESIDENTS

Under the California Consumer Privacy Act ("**CCPA**"), we are required to inform California residents who are users about the categories of personal information we collect about you and the purposes for which we will use this information. We collect information which you give us at the registration, in particular your name and email address and information about your use of our Services. We use and disclose the personal information we collect for our business purposes as identified in the CCPA for communicating with you about the Services as well as for legal compliance, performing services, internal operations, protection against security incidents and activities to improve and maintain our business. California residents have the right to request that we disclose what personal information we collect from you, to delete that information, and to opt-out of the sale of your personal information, subject to certain restrictions. We do not, and will not, sell your personal information.

DATA RETENTION AND DELETION

We retain personal data we collect from you where we have an ongoing legitimate business need to do so (for example, to comply with applicable legal, tax or accounting requirements, to enforce our agreements or comply with our legal obligations). When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal data has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing, until deletion is possible.

CHANGES TO THIS PRIVACY POLICY

We may change this Privacy Policy from time to time. If we make any changes to this Privacy Policy, we will add or change the “Last Updated” date at the top of the page. If such changes are material in nature, we will provide you with additional notice.

If you object to this Privacy Policy or any subsequent changes, you should discontinue use of our products and services.