

Privacy Policy

I. Content and Purpose of this Document

This document provides information regarding the protection of personal data processed by Arcaisoft s.r.o., including data of website visitors (<https://nutrixo.arcai.cz>), users of our mobile application, our clients, and other individuals whose data may be entered into our system for educational or research purposes.

The purpose of this document is to inform you (data subjects) about your rights and to provide clear and understandable information on how personal data is handled. We value the trust you place in us by providing your personal data, and therefore we process personal data in accordance with Regulation (EU) 2016/679, the General Data Protection Regulation ("GDPR").

For completeness, we assume that all data you provide to us is true and up-to-date. If there are any changes to your data, we ask that you inform us without undue delay so that we can take corrective action.

II. Controller of Personal Data

Arcaisoft s.r.o., Tax ID: CZ09669990

Registered address: Mahenova 164/2, Košíře, 150 00 Prague

Company registration: C 340107/MSPH, Municipal Court in Prague

Contact email: ondrej.kokes@arcai.cz

III. What Personal Data We Process and How We Obtain It

We process data that you voluntarily provide through our mobile application or web interface, and information entered into our software regarding you or your clients (educational/research subjects) and their nutritional intake.

Personal data we process includes:

- Name, surname, address, date of birth, age, personal identification number, phone number, email
- Food intake records, medical history, allergy and intolerance information
- Photos of client meals (uploaded voluntarily) for diet tracking and processing

IV. Purposes, Duration, and Legal Basis for Data Processing

A. For Nutritional Analysis and Client Management

We process personal data to provide nutritional analysis and support your ability to manage client or participant data within the application.

- Legal basis:
 - Article 6(1)(b) GDPR — processing is necessary for the performance of a contract with the user or for pre-contractual steps at the user's request.
 - Article 6(1)(f) GDPR — our legitimate interest in providing and improving our services.
 - If special category data (e.g. health data, dietary restrictions) is processed:
 - Article 9(2)(a) GDPR — explicit consent from the data subject, or
 - Article 9(2)(j) — processing necessary for scientific or research purposes, subject to safeguards under Article 89 GDPR.
- Retention:

We retain this data for as long as the user account is active or cooperation is ongoing, and for a reasonable period (e.g. 2 years) afterward unless required longer by law.

B. To Fulfill Legal Obligations

We process personal data to comply with legal obligations, including accounting, tax, and regulatory requirements.

- Legal basis: Article 6(1)(c) GDPR — compliance with legal obligations.
- Retention: As specified by applicable laws (e.g., tax and accounting regulations, typically 5–10 years depending on the jurisdiction).

C. Based on Legitimate Interests

We may process data based on our legitimate interests, such as:

- Protection of our legal rights (e.g., contract enforcement, defense against legal claims)
- Service improvement
- Client relationship continuity
- Legal basis: Article 6(1)(f) GDPR — legitimate interests pursued by the controller.
- Retention: Personal data is retained for up to 3 years after the end of cooperation or last meaningful contact, in case the cooperation is renewed or a dispute arises.

D. Based on Your Consent

You may withdraw your consent at any time. However, if we process your data under another legal basis (see A–C above), we will continue processing it for those specific purposes, as consent is not required for them. Consent for marketing purposes can be withdrawn at any time by a clear, unambiguous statement via email or through the opt-out option in every marketing communication.

V. Sharing of Personal Data with Third Parties

We only share personal data with trusted third-party processors as necessary to operate our services and fulfill contractual and legal obligations. All third-party service providers are bound by data processing agreements in accordance with Article 28 GDPR and process data solely on our instructions.

Current Data Recipients Include:

- OpenAI (www.openai.com):
For voluntary meal image analysis through an API. Images are processed and temporarily stored within the EU.
 - *Role:* Data processor
 - *Purpose:* Meal photo analysis (AI-powered dietary estimation)
- Vedos (www.vedos.cz):
Cloud infrastructure and hosting provider
 - *Role:* Data processor
 - *Purpose:* Secure application hosting and data storage

Other disclosures:

Personal data may be disclosed to **public authorities** or regulators when required by law, such as in the context of inspections, audits, or investigations.

Future processors:

If we engage new processors or services in the future, we will ensure they comply with GDPR and provide an equivalent level of protection. This privacy policy will be updated accordingly.

VI. Your Rights Regarding Personal Data

As a data subject under the General Data Protection Regulation (GDPR), you have the following rights in relation to your personal data. You may exercise any of these rights by contacting us at ondrej.kokes@arcaj.cz.

A. Right of Access

You have the right to confirm whether we are processing your personal data and, if so, access to that data and information on its processing.

B. Right to Rectification

You have the right to request the correction of inaccurate or incomplete personal data without undue delay.

C. Right to Erasure (“Right to Be Forgotten”)

In legally defined situations, you can request the erasure of your personal data without undue delay (Article 17 of the GDPR includes exceptions).

D. Right to Restriction of Processing

Under Article 18 of the GDPR, you can request restrictions on the processing of your personal data.

E. Right to Data Portability

Under Article 20 of the GDPR, you have the right to obtain your personal data and transmit it to another controller, or request a direct transfer, where technically feasible.

F. Right to Object

If we process your personal data under legitimate interests, you may object to such processing. We will then stop processing the data unless our interest overrides yours.

If the purpose is direct marketing, the objection will always stop further processing.

G. Right to Withdraw Consent

If processing is based on your consent, you may withdraw it at any time. This does not affect the lawfulness of processing based on consent before its withdrawal or processing based on other legal grounds.

H. Right to Lodge a Complaint

If you believe your data protection rights have been violated, you may file a complaint with the supervisory authority:

Czech Office for Personal Data Protection – www.uoou.cz

Further information, including the full text of Regulation (EU) 2016/679 (GDPR), is available at www.uoou.cz.

If you have any questions about how your personal data is processed, you may contact us at ondrej.kokes@arcai.cz.

Effective as of March 25, 2025