

PRINCIPLES FOR PERSONAL DATA PROCESSING AND PROTECTION

1. The Controller of personal data.

The Controller of personal data is Fórum Karlín, a.s., with its registered office at Prague 9, Českomoravská 2345/17a, 190 00 Prague, Company ID No.: 08259551, registered in the Commercial Register kept by the Municipal Court in Prague, Section B, File 24487 (hereinafter referred to as the “**Controller**”). The Controller is the operator of the so-called **Forum Karlín** (i.e., the building located on plot No. 408, cadastral area Karlín, at Pernerova 51, Prague 186 00) (hereinafter also referred to as the “**Building**”).

2. Lawfulness of personal data processing.

Personal data is collected and processed by the Controller in compliance with legal regulations governing the protection of personal data, in particular Act No. 110/2019 Coll., on the Processing of Personal Data, as amended (hereinafter referred to as the “**Act**”), Act No. 480/2004 Coll., on Certain Information Society Services, and Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter referred to as the “**GDPR**”).

3. Definition of personal data.

The Controller collects personal data provided directly by the data subject, either based on consent or in connection with the conclusion of a contract between the data subject and the Controller or other legal action carried out between the data subject and the Controller, as well as personal data collected during a visit to the Building. Personal data provided in this way typically include first name, surname, e-mail address, contact details (phone, mobile phone, address, contact address), personal ID number, photographs for the purpose of registering into the system in the case of repeated entries into the Building, and, in the case of purchases made by the data subject, also information about such purchase (in particular the type of goods/services, price, quantity, and payment method), as well as any other personal data communicated by the subject to the Controller (hereinafter also referred to as “**personal data**”).

4. Purposes of personal data processing.

Personal data is processed by the Controller for the following purposes and based on the following legal grounds:

- a. in the case of **providing an e-mail address for receiving a newsletter on the Controller's website**, the purpose of personal data processing it to send marketing communications and business-related updates from the Controller, **based on consent for such processing**; the purpose may include sending

operational and informational communications regarding the operation of the Building (e.g., information on security measures for events, etc.); the e-mail address is provided voluntarily by the data subject for this purpose, and consent is not a prerequisite for the provision of any service or sale of goods by the Controller.

- b. in the case of **purchasing goods/services** from the Controller, the purpose is to fulfill the contract, or to provide operational and other information necessary for the use of the goods/services, based on the **contract**; the purpose may also include sending operational and informational communications regarding the operation of the Building (e.g., information on security measures for events, etc.); the purpose may also serve the Controller's internal needs, primarily to protect the rights and legitimate interests of the Controller, to generate statistics and analyses, to improve and enhance services, and, if necessary, to analyze business opportunities, etc.; In the case of purchasing goods/services, providing personal data is a prerequisite for the conclusion of a valid contract, without which the contract cannot be concluded; in the case of purchasing goods/services from the Controller, **personal data is also processed for the purpose** of sending a newsletter (marketing communications); the data subject has the right to object to the processing of personal data for direct marketing purposes, which is carried out without consent, at any time, by submitting a written objection via e-mail to the Controller at osobniudaje@forumkarlin.cz or by sending a written notice to the Controller's registered office address;
- c. in the case of consent to the processing of personal data by the Controller on the **website of the Controller's ticket operator** (companies selling tickets for events held in the Building, among others), the purpose of processing personal data is to send marketing communications and business-related updates from the Controller, based on **consent for such processing**; this may also include sending operational and informational communications regarding the operation of the Building (e.g., information on security measures for events, etc.), statistical analysis of visitors to events held in the Building, and other analytical evaluations for the Controller's purposes; the personal data is provided voluntarily by the data subject for this purpose, and consent is not a prerequisite for the provision of any service or the sale of goods by the Controller or a third party;
- d. in the case of **live broadcasts** on screens, the purpose is to provide customer services at selected events – live broadcast from the auditorium to large screens inside the Building, used for services such as entertainment during breaks, etc.; the provision of such personal data is a prerequisite for entry into the Building and is based on the **legitimate interests** of the Controller; the live broadcast is always conducted in accordance with Act No. 89/2012 Coll., the Civil Code, as amended (hereinafter referred to as the “**CC**”).
- e. in the case of creating **event records**, the purpose is the legitimate interest of the Controller, such as
 - (i) the operator of the Building, or
 - (ii) as the event organizer, to capture the artistic performance, the mood and atmosphere of the audience, to promote the event or future events, and for further commercial use of such recordings by the Controller,

processing may take place on, for example, the Controller's social media, the Controller's website, in a magazine published by the Controller, and other media; such recordings are made at each event held in the Building, and information about the recording is usually provided for the respective event on the event's website (www.forumkarlin.cz); the provision of such personal data is a prerequisite for entering the Building in order to attend the respective event, and thus conclude a contract for the sale of tickets for the event; recordings are made in accordance with the CC, particularly in accordance with Sections 88 and 89 of the CC for journalistic and artistic purposes and the protection of the Controller's rights;

- f. in the case of **commercial contractual relationships** between the Controller and the supplier/customer, the purpose is to perform the contract, or to communicate operational and other information for the performance of the contract, based on a **concluded or pending contract**; the purpose may also be the internal need of the Controller, particularly to protect the rights and legitimate interests of the Controller, to produce statistics and analyses, to improve and enhance services, and, if necessary, to adapt them, for the analysis of business opportunities, etc.; the provision of personal data of the negotiating and sometimes contact persons is a prerequisite for the conclusion of a valid contract, without which the contract cannot be concluded;
- g. in the case of providing services at Forum Karlín and signing the document **“Protection of Confidential Information and Rules of Movement Around Forum Karlín”**, the purpose of processing personal data is to protect the rights of the Controller and its clients against breaches of the protection of confidential information, including trade secrets; the provision of personal data is a prerequisite for the data subject to provide services at certain events, and without providing such data, the entity cannot provide performance to the Controller, Fórum Karlín, a.s., at such an event;
- h. in the case of a **request by the data subject** to the Controller, the purpose of processing personal data is to fulfill the Controller's obligations under the GDPR and to record the fulfillment of such obligations in accordance with the GDPR. Personal data provided by the data subject is processed, usually including name, surname, contact information (e-mail, phone, address), as well as the method and date of delivery of the request and the manner and date of its resolution, or other data necessary for identifying and processing the request in accordance with the GDPR.
- i. in the case of negotiations on the conclusion of an employment relationship, the purpose of processing personal data is to process the application necessary for the conclusion of the employment relationship, while processing personal data provided by the data subject, usually including first name, surname, contact information (e-mail, phone, address), education, previous work experience, and other relevant data.

5. Source of personal data.

The source of personal data is:

- a. the data subject (either directly by communication to the Controller, by their activity on social media profiles managed by the Controller, or through cookies, if the data subject has enabled this, or e.g. via e-mail);
- b. the employer of the data subject (e.g., when providing contact details of its employees) or another intermediary of the data subject who communicates them with the knowledge/consent of the data subject;
- c. cameras of the Controller as the operator of the Building or the event organizer, when recording an event held in the Building;
- d. public registers of entrepreneurs (commercial register, trade register, VAT payer list, land registry database, and other publicly accessible professional registers).

6. Consent to provide an e-mail address.

If personal data is processed based on the consent granted by the data subject, in electronic form – by providing an e-mail address on the Controller's website, it is necessary to enter the e-mail address in the appropriate field, check the box to give consent, confirm familiarity with these terms in the corresponding checkbox, and confirm via the e-mail sent that the e-mail address was entered by an authorized person. If the entered e-mail is not confirmed via the provided link, the e-mail will not be registered in the Controller's database nor otherwise processed.

7. Correctness of personal data.

By entering and providing personal data to the Controller (on the website www.forumkarlin.cz when purchasing goods or services, etc.), the data provider confirms the legitimacy of providing such personal data, as well as its accuracy and completeness.

8. Processors.

The Controller may entrust the processing of personal data, including sending commercial communications, to external entities that provide administrative, professional, or technical support for the Controller, or carry out marketing, commercial, or other specific activities (hereinafter referred to as “**Processors**”). These external entities are contractually bound to comply with the principles of Personal Data Processing Policy in accordance with the GDPR and other applicable legal regulations, just as the Controller’s company utilizes the services of the Processors in accordance with this policy by

- a. Marketing services and communication, taking photos and videos, social network and website operators;
- b. Operation of the accounting system (technical support);
- c. Event organizing and security services, camera system support;
- d. Ticketing services;
- e. Legal and payment services;
- f. Administrative and technical administration of the Building.

9. Third party access.

The Controller may also disclose personal data to public authorities for legal reasons and, to the necessary extent, to other entities for the protection of the Controller's rights (e.g., courts, law enforcement authorities, etc.). The recipients of the personal data are listed below.

10. Duration of processing.

The Controller processes personal data

- a. for a maximum period of 5 years from the time of subscribing to the newsletter and granting consent for the processing of personal data, or until the data subject withdraws their consent;
- b. for a period determined by the purpose of processing personal data, to the extent necessary, in cases where personal data is processed based on a legal basis other than consent (particularly for the period required to exercise rights related to liability for defects or warranties for goods or services purchased from the administrator, typically two years; the period for exercising the administrator's rights against its debtors, usually three years; retention of tax documents for tax purposes, usually ten years, etc.), unless otherwise specified below;
- c. for the period specified in the consent, if personal data is provided with the consent of the data subject and such consent specifies the duration; otherwise, it will be valid for 5 years from the granting of consent;
- d. for a period of 10 years in the case of recordings of an event by the administrator as the event organizer;
- e. for the period necessary to process the request submitted to the Controller via a web form on the Controller's website, but no longer than 5 years from the time the data was provided, unless otherwise specified in the relevant form;
- f. for a period of 5 years in the case of signing the "Protection of Confidential Information and Rules of Movement around Forum Karlín" notice;
- g. for a period until the end of the calendar year in which three years have passed from the date of the holding of an event for which the data subject has purchased a ticket or service, in relation to

personal data processed for direct marketing purposes when purchasing goods or services from the Controller, unless such data are provided based on consent (in which case the period specified in the consent applies); unless the purchase is related to an event, for a period until the end of the calendar year in which the fourth year from the purchase of the product/service expires

- h. for a period of five years from the sending of a response to a request from the data subject to the Controller in relation to the exercise of the data subject's rights under the GDPR (e.g., a request to disclose which data the Controller processes, etc.)
- i. for a period of two months after the completion of the recruitment process to fill the position, or two months after submitting the CV without a recruitment process in the case of sending the CV to the Controller, unless consent is provided for longer processing. The first name, surname, and the position the data subject applied for will be processed for two years from the moment they were communicated to the Controller.

After the legitimate processing period ends, for example, due to the termination of the service or upon request in legitimate cases, the Controller will stop processing the personal data and will delete the personal data stored with the Controller or processor in accordance with applicable legal regulations.

11. Processing and security measures.

The provided data is processed by the Controller both automatically and manually, with the possibility of mechanical processing, in a secure manner and in accordance with technical and security mechanisms that ensure the maximum possible protection of the processed data (in particular, protecting it against unauthorized access or transmission, loss, destruction, or any other misuse).

12. Type of processing.

Personal data will be processed primarily in the form of collection, sorting, recording, organization, structuring, storage, adaptation, modification, retrieval, viewing, use, disclosure, including disclosure by transmission, dissemination, combination, restriction, destruction, erasure, etc.

13. Automated decision making.

The Controller does not carry out automated decision-making, including profiling, which has legal effects for the data subject or similarly significantly affects them. Automated processing with elements of profiling is carried out only in the case of sending newsletters (marketing communications) based on a previous purchase of goods/services from the Controller or the Controller's ticket operator, and only to the extent of

sending newsletters about similar products of the Controller that the data subject administrator or ticket operator purchased.

14. Withdrawal of consent.

The consent provided can be withdrawn at any time, with effect from that point forward. The withdrawal of consent can be made in writing by sending a written withdrawal to Fórum Karlín, a.s., Českomoravská 2345/17a, 190 00 Prague, or electronically by sending an e-mail to the e-mail address osobniudaje@forumkarlin.cz. In the case of newsletters (marketing communications), the method to withdraw consent is provided directly in the newsletter.

15. Information about the rights of the data subject.

Data subjects have the following rights:

a) **Right of access to personal data:**

The data subject has the right to request information on which personal data the Controller processes concerning him or her, either in writing by mail at the address Fórum Karlín, a.s., Českomoravská 2345/17a, 190 00 Prague or via e-mail at osobniudaje@forumkarlin.cz. Only in accordance with the GDPR can the Controller request reimbursement for the costs associated with providing this information. Upon request, the Controller will provide copies of the processed personal data in accordance with the GDPR. This right to obtain a copy shall not negatively affect the rights and freedoms of other individuals.

b) **Right to rectification:**

The data subject may request the Controller to correct inaccurate or incomplete personal data processed about the data subject.

c) **Right to erasure:**

The data subject may request the Controller to delete their personal data if any of the following situations occur:

- i. personal data are no longer necessary for the purposes for which they were collected
or otherwise processed;
- ii. the data subject has withdrawn the consent on which the personal data were processed, and there is no other legal basis for the processing;
- iii. the data subject has objected to being subject to decisions based solely on automated processing of personal data, and there are no overriding legitimate grounds for such processing, or the data subject has objected to the processing of personal data for direct marketing purposes;
- iv. the personal data of the data subject have been processed unlawfully;

- v. the personal data of the data subject must be erased in order to comply with a legal obligation under Union or Member State law to which the Controller is subject;
 - vi. personal data of the data subject were collected exclusively in connection with offering information society services.
- d) **Right to restriction of processing:**
The data subject may request the Controller to restrict the processing of their personal data if any of the following applies:
- i. the data subject has contested the accuracy of the personal data, for a period necessary for the Controller to verify the accuracy of the personal data;
 - ii. the processing of personal data is unlawful, but the data subject opposes the erasure of the data and instead requests the restriction of its use;
 - iii. the Controller no longer needs the personal data for the purposes of processing, but the data subject requires them for the establishment, exercise, or defense of legal claims;
 - iv. the data subject has objected to the processing pursuant to Article 21(1) of the GDPR, pending verification of whether the legitimate grounds of the Controller override those of the data subject.
- e) **Right to data portability:**
In cases of processing personal data based on consent or a contract and processed automatically, the data subject has the right to obtain the personal data concerning them that they have provided to the Controller, and the right to transfer these data to another Controller, in a structured, commonly used, and machine-readable format, provided that the exercise of this right does not adversely affect the rights and freedoms of others.
- f) **Right to object:**
The data subject may at any time object to the processing of personal data concerning him or her carried out based on the legitimate interest of the Controller and for the purposes of direct marketing carried out based on the legitimate interest of the Controller.
- g) **Right to be informed:**
The data subject has the right to be informed by the Controller if a personal data breach has occurred that is likely to result in a high risk to the rights and freedoms of natural persons, including the data subject.
- h) **Right in relation to automated processing:**
The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which has legal effects concerning the data subject or similarly significantly affects the data subject.

16. Changing personal data.

If personal data changes, the data subject is obliged to notify the Controller of the change in the situations specified by the relevant regulation, otherwise, the proper and accurate processing of the provided personal data cannot be guaranteed.

17. Place of exercising rights.

All rights (revocation, objections, etc.) may be exercised by the data subject

- a. **in writing by post** to the Controller at the following address: Fórum Karlín, a.s., Českomoravská 2345/17a, 190 00 Prague;
- b. **personally at the Controller's address:** Fórum Karlín, a.s., Českomoravská 2345/17a, 190 00 Prague;
- c. **by sending an e-mail** to osobniudaje@forumkarlin.cz.

The data subject may also lodge a complaint with the Office for Personal Data Protection,
Pplk. Sochora 727/27, 170 00 Prague 7-Holešovice, posta@uouu.cz.

18. Recipients.

Personal data may be provided to the following recipients:

- a. **Processors of the Controller** – providers of security and organizational services, event organizers, ticket operators (ticket vendors), media service providers (particularly media campaign processors), web service providers (especially hosting), providers of service and support services for the IT systems of the Controller or processor systems, and providers of administrative and technical support to the Controller.
- b. **Law enforcement agencies;**
- c. **Other public authorities** in the case of a legitimate request or due to the legal obligations of the Controller or the relevant Processor
- d. The **event organizers**, in the case of CCTV footage, when the data subject has been informed of the processing in advance (e.g. in the event organizer's instructions), and the organizer will request the footage for the purpose of ensuring or investigating the security or order of the event, compliance with event rules, or the organisation of the event they are organising in the Building.

19. Cookies.

The Controller may use cookies on its website for business and marketing purposes. In this case, the user is informed about the cookies when visiting www.forumkarlin.cz and asked to consent to their use.

20. Policy updates.

This Privacy Policy may be amended or updated from time to time. Any changes will be effective by posting the revised policy on www.forumkarlin.cz