

## PRIVACY POLICY KVEEQ

This privacy policy is providing you the necessary information on how the company **SPR media s.r.o.**, with its registered seat at Drimlova 2513/1, 155 00 Praha, company registration number 045 71 592, registered in the commercial register maintained by the Municipal court in Prague section C insert 249837 (hereinafter referred to as „SPR media“ or as „Controller“) is receiving, storing and further processing your personal data in relation to your use of the services of the **KVEEQ** platform.

### 1. General provisions

The purpose of this privacy policy in accordance with the regulation (EU) of the European Parliament and of the Council of 27 April 2016, No. 2016/679 (hereinafter referred to as “**GDPR**”) is to provide you with information on what personal data is the Controller processing in connection with provision of the services of the KVEEQ platform, as well as what are the purposes of personal data processing and how long does controller processes personal data and to what Controllers can the personal data be transferred and also to inform you what rights natural person possesses in relation with processing of their personal data and how to execute such rights.

This privacy policy is relevant to all natural persons using the services of the KVEEQ platform, namely organizers of the sport events (eventually natural persons acting on behalf of the organizer), as well as journalists registered to the platform.

This privacy policy becomes effective on May 1st 2021 and is adopted in accordance with GDPR in order to fulfill the information obligation of the Controller as stipulated in art. 13 of the GDPR.

### 2. Controller of the personal data

The controller of your personal data is the company SPR media, with its actual contact info available at [www.sprmedia.eu](http://www.sprmedia.eu)

### 3. Data protection officer

The Controller is not obliged to appoint data protection officer. Data protection officer have not been appointed by the Controller.

You can contact SPR media, as the Controller directly at:

SPR media s.r.o.  
Drimlova 2513/1, Stodůlky  
155 00 Praha  
E-mail: [info@sprmedia.eu](mailto:info@sprmedia.eu)

## 4. What kind of personal data we process

Personal data is any information that relates to a natural person, ie to you, through which the Administrator is able to identify you. In connection with the provision of KVEEQ platform services, the Administrator may process the following categories of personal data.

### 4.1 General personal information

Personal data that is or in certain situation can be necessary for your registration to the KVEEQ platform:

- Name and surname;
- e-mail address;
- password;
- telephone number;
- name of your employer or the subject on which behalf you act.

### 4.2 Personal data processed in relation with the operation of the platform

For the purpose of smooth operation of the KVEEQ platform the Controller manages and processes mainly the personal data as specified in the section 4.1 of this privacy policy. However in relation with the operating of the platform other data might be processed, namely:

- Records of the communication between the Controller and registered users;
- Invoicing details and payment info.

## 5. Purposes, method and period of the personal data processing

5.1 Processing is necessary for the performance of a contract, for the compliance with our legal obligations and for the legitimate interest of the Controller

### 5.1.1 Processing is necessary for the performance of a contract

In order to operate the KVEEQ platform, the Controller needs to know your personal data and to further process such data. The Controller processes your personal data mainly for the purpose of your registration and further cooperation within the platform where legal title to process such data is fulfillment of the contract. For these purposes the Controller processes personal data in the scope of general personal information and personal data processed in relation with the operation of the platform as specified in the art. 4.1 and 4.2 of this privacy policy.

We obtain personal data processed in this way from you directly during your registration into the platform, and also during the provision of our services

This personal data is processed by the Controller only for the period of existence of the contractual relationship between you and the Controller and further for a period of three years from your cancellation of registration, or for the period for which it is imposed on the Controller by law.

### 5.1.2 Processing is necessary for compliance with our legal obligations

In some cases the Controller might be obliged to fulfill its obligations laid upon it by the following legislation Act No. 563/1991 Coll., on accounting (hereinafter referred to as "Act on accounting"), Act No. 235/2004 Coll., on value added tax, Act No. 586/1992 Coll on income tax. In these cases the Controller will process personal data as required by the above mentioned acts.

Some personal data may be stated on accounting documents (ie invoices or other documents). The above mentioned acts require the Administrator to keep these documents for up to 10 years. Therefore, if the Administrator has a legal obligation to archive these documents, your personal data listed on the relevant document are processed together with them.

### 5.1.3 Processing for the legitimate interest of the Controller

The Controller is entitled to process your e-mail address in with art. 7 paragraph 3 of Act No. 480/2004 Coll., On certain information society services, for the purpose of commercial communications concerning our services and products, if you have not refused such a submission.

## 5.2 Personal data processing based on your consent

The Controller processes your personal data mainly when required by law, when the processing of data is necessary for the performance of the contract or when this is done on the basis of the legitimate interest of the Controller. Only in exceptional cases the Controller process personal data on the basis of your consent, in accordance with the purpose and for the period specified in this consent.

## 6. Processors of personal data

In order to fulfill its legal and contractual obligations, the Controller is entitled to use professional and specialized services of third parties. In the case that these suppliers process personal data handed over by the Controller, they are in the position of personal data Processors and they process personal data only within the instructions of the Controller and may not use them otherwise.

These Processors are namely:

- Provider of data cloud, the company DEEP VISION s.r.o., with its registered seat at Hlaváčova 207, Zelené Předměstí, 530 02 Pardubice, company registration number: 275 40 065,

The Processors might also be the following external providers of services:

- Provider of legal services;
- External accountant and tax advisor;
- External provider of IT services, computer network and hardware.

The Controller has entered into a contract on personal data processing with the Processors mentioned above. These contracts guarantee at least the same level of protection for your personal data as this Privacy Policy.

As part of the performance of its legal obligations, the Controller may transfer your personal data to the administrative authorities and bodies specified by the applicable legislation.

## 7. Security of your personal data

The Controller have introduced to its system such necessary technical and organizational measures of internal control and processes of safety of the information that are in compliance with best practice corresponding to the potential risk to you. At the same time the Controller takes into consideration the perspective of the future technological progress in order to protect your personal data from unauthorized disclosure, access or its loss. These measures include, but are not limited to, employees' data protection training, regular backups of the data, data recovery procedure, and mechanism of responsibility for an infringement of protected data, software and hardware protection.

The employees of the Controller are bound by the duty of confidentiality of all your personal data, even after the termination of their employment. A signed declaration of confidentiality is part of the employment contract of the Administrator's employees.

## 8. Your rights as a subject of personal data

If you exercise any of your rights under this Article 8 or under applicable law, we will notify you of any action taken or deletion of your personal data or restrictions on processing in accordance with your request by any recipient to whom such data has been provided under Article 7 of this Policy as long as such notification will be possible and / or will not require disproportionate effort.

If you wish to exercise these rights and / or obtain the relevant information, you may contact us by e-mail [info@sprmedia.eu](mailto:info@sprmedia.eu) or in writing at the registered office of the Controller.

If you exercise your rights, we may require you to provide some of the identifying information you have provided to us. The provision of such information is necessary to verify that the relevant request has actually been sent by you. We will reply to you within one month of receiving your request, but we reserve the right to extend this period by two months.

## 8.1 Right to access to personal data

You have right to obtain from the controller confirmation as to whether or not personal data concerning you are being processed and where, access to the personal data and the following information:

- On the purposes of the processing; the categories of personal data concerned; the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations; where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; the right to lodge a complaint with a supervisory authority; where the personal data are not collected from the data subject, any available information as to their source; the existence of automated decision-making, including profiling, referred to in Sec. 22(1) and 22(4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject,

provided that the rights and freedoms of third persons are not adversely affected you also have right to get the copy of your personal data.

In the case of a repeated request, the Controller will be entitled to charge a reasonable fee for the copy of personal data.

## 8.2 Right to rectification of your personal data

In accordance with art. 16 of GDPR you have a right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. You are also obliged to notify changes to his personal data and to prove that such a change has occurred. At the same time, you are obliged to provide co-operation to the Controller if it is found that the personal data the Controller processes about you are not accurate. We will carry out the rectification without undue delay, but always with regard to the given technical possibilities.

## 8.3 Right to erasure your personal data

In accordance with art. 17 of GDPR you have the right to delete personal data concerning you, unless the Controller proves legitimate reasons for the processing of such personal data. The Controller has mechanisms in place to ensure automatic anonymization or deletion of personal data if they are no longer needed for the purpose for which they were processed.

## 8.4 Right to restrict processing of your personal data

In accordance with art. 18 of GDPR you have the right to restrict the processing of your personal data until the complaint is resolved, if you deny the accuracy of personal data, the reasons for their processing or if you object to their processing.

### 8.5 Right to data portability

In accordance with art. 20 of GDPR you have the right to portability of your personal data that you have given us as the personal data controller, in a structured, commonly used and machine-readable format. At the same time, you have the right to ask us to pass this data on to another administrator.

In case that the exercise of this right could adversely affect the rights and freedoms of third parties, your request cannot be granted.

### 8.6 Right to object

In accordance with art. 20 of GDPR you have the right to object to processing your personal data to the Controller.

If the Controller does not prove that there is a serious legitimate reason for the personal data processing which outweighs your interests or rights and freedoms, the Controller shall terminate the processing on the basis of the objection without undue delay.

### 8.7 Právo na odvolání souhlasu se zpracováním osobních údajů

If you grant the Controller consent to the processing of your personal data, you can revoke it at any time. The revocation must be made an explicit, comprehensible and specific expression of will, either in writing to the address of the registered office of the Controller or via the e-mail address [info@sprmedia.eu](mailto:info@sprmedia.eu).

### 8.8 The right to contact the Office for Personal data Protection

You have the right to file a complaint regarding the way how we process your personal data to the Office for Personal Data Protection, Pplk. Sochora 27, 170 00 Praha 7. web: [www.uoou.cz](http://www.uoou.cz).

## 9. Updates of this Privacy policy

We would like to inform you that we may modify or update this Privacy Policy. Any changes to this Policy will take effect upon publication on the website [www.sprmedia.eu](http://www.sprmedia.eu)