

KVIFF Guide Privacy Policy

We at **KVIFF Group a.s.**, with a registered seat at Panská 892/1, Nové Město, Praha 1, postcode 110 00, ID No: 09750223, incorporated in the Companies Register maintained by the Municipal Court in Prague under file No. B 25907 ("**we**"), we pay great attention to the protection of personal data. In this document, you will find information on what personal data we process as a controller within the KVIFF Guide mobile application and also after logging in on the website www.kviff.com ("**KVIFF Guide**"), whether we process the data on the basis of consent or on the basis of another legal ground, for what purposes we use it, to whom we may transfer it and what rights you have in connection with the processing of your personal data.

A. What personal data do we process?

In particular, we process the following categories of personal data:

- **Identification and contact data**, which are mainly your e-mail address, first name, last name and information about your KVIFF ID;
- **Service usage data**, which is mainly information about how you use the KVIFF Guide app, what content you are interested in, your user account settings, as well as information about ticket reservations and a list of your favourite films;
- **Records of mutual communications**, which are mainly communication between you and us;
- **Network identifiers**, which are mainly your IP address, MAC address and information about the device you use in connection with KVIFF Guide.

B. Why do we process your personal data and what entitles us to do so?

We process your personal data for various purposes, either on the basis of your consent or without your consent if we have a different legal basis for the processing.

We process personal data for the following purposes:

- a) **providing the services of the KVIFF Guide**, based on the performance of the contract entered into with you at the time of the creation of your user account, in order to provide you with content within the KVIFF Guide and to provide you with the service you request (e.g. ticket reservation);
- b) **improving the quality of services provided, creating analyses, reports and statistics**, based on our legitimate interest in collecting feedback and evaluating information to continuously improve our services;
- c) **personalisation of content and basic targeted offers**, based on our legitimate interest in improving the user experience, recommending relevant content and promoting our services;
- d) **protection of legal claims**, based on our legitimate interest in ensuring the proper protection and effective exercise of our rights and claims;

e) **fulfillment of our legal obligations**, based on the fulfillment of our legal obligations.

If you give us your consent to do so, we will share your identification data, contact details and service usage data within the KVIFF Group so that we or other members of the KVIFF Group can send you relevant information about news, competitions, invitations to our events or offers tailored to you from time to time. The KVIFF Group includes the following companies: KVIFF Group a.s. (ID No: 09750223), KVIFF.TV a.s. (ID No: 10780777), KVIFF Events s.r.o. (ID No: 11685611), KVIFF Distribution s.r.o. (ID No: 10780645) and Film Servis Festival Karlovy Vary, a.s. (ID No: 25694545). All of these companies act as joint controllers and KVIFF Group a.s. also manages the shared personal data storage to which it and the others provide personal data and which all members can access. You may withdraw your consent and exercise other rights related to the processing of personal data at any time with any of the above-mentioned companies.

C. For how long do we process your personal data?

We retain the aforementioned personal data to the extent necessary for the duration of the user account to enable you to use the KVIFF Guide and for up to 4 years after termination of the account in case a dispute arises regarding the relationship between us and you in connection with your use of the KVIFF Guide, the KVIFF Guide Terms of Use or this KVIFF Guide Privacy Policy. Where the retaining of personal data is necessary to comply with legal obligations, we will retain personal data for as long as required by law.

D. From what sources do we obtain your personal data?

In most cases, we collect your personal data when you create a user account and when you subsequently use the KVIFF Guide or communicate with us. We also obtain personal data directly from you by monitoring your activity on the KVIFF Guide.

E. Who processes your personal data and who do we share it with?

As a data controller, we process all the above-mentioned personal data. This means that we determine the above-defined purposes for which we collect your personal data, determine the means of processing and are responsible for its proper execution.

We share your personal data with other controllers whose services we offer through the KVIFF Guide in order to provide you with the service you request (e.g. to make a ticket reservation).

We do not pass on your personal data to other controllers in any other way. The exceptions are cases where we are required to share such data by law (especially by courts and the police in the exercise of their statutory powers), and in cases where we share this data with the state authorities in order to achieve the above-mentioned purposes.

We share your data with other processors, who process your personal data for our company and in accordance with our instructions, in particular:

a) technical infrastructure providers such as vivalogic s.r.o. (ID No: 27606911)

All of these processors are bound by processing agreements to meet the requirements of personal data protection laws, in particular to protect your personal data.

E.1 Transfer of your personal data outside the European Economic Area

As part of the transfer of your personal data to our processors, listed above under „*Who processes your personal data and who do we share it with?*“ we may also transfer your personal data to third countries outside the European Economic Area that do not provide an adequate level of protection for personal data.

We will only make such transfers if the relevant recipient agrees to comply with the standard contractual clauses issued by the European Commission and available at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32021D0914>.

F. What are your rights in connection with the processing of personal data?

Just as we have our rights and obligations when processing your personal data, you also have certain rights during the processing of your personal data. These rights include:

F.1 Right to withdraw consent to the processing

You may withdraw your consent at any time. However, this does not affect the lawfulness of the processing based on the consent given prior to its withdrawal.

F.2 Right of access

Simply put, you have the right to know what data about you we process, for what purposes, for how long, where we get your personal data, who we share it with, who processes it apart from us, and what further rights you have in connection with the processing of your personal data. This has all been explained in this KVIFF Guide Privacy Policy. However, if you are unsure as to what personal data about you we process, you may ask us to confirm whether or not we process personal data concerning you and, if so, you have the right to access such personal data. Under the right of access, you may request a copy of the personal data undergoing processing, with the first copy provided to you free of charge and additional copies for a fee.

F.3 Right to rectification

If you find that the personal data we process about you is inaccurate or incomplete, you are entitled to have it rectified or completed without undue delay.

F.4 Right to erasure

In some cases, you have the right to have your private data erased. We will erase your personal data without undue delay if any of the following grounds apply:

- a) we no longer need your personal data for the purposes for which we processed it,
- b) you exercise your right to object to processing (see the "*Right to object to processing*" section below) regarding the personal data we process based on our legitimate interests, and we find that we no longer have any such legitimate interests that would justify such processing, or
- c) it appears that our processing of personal data has ceased to comply with generally binding regulations.

This right does not apply if the processing of your personal data is still necessary for:

- a) fulfilling our legal obligations,
- b) the purposes of archiving, scientific or historical research or for statistical purposes, or
- c) the establishment, exercise or defense of our legal claims.

F.5 Right to restriction of processing

In some cases, you may, in addition to the right to erasure, exercise the right to restriction of processing of personal data. This right allows you, in certain cases, to require that your personal data be flagged and that this data is not subjected to any further processing operations - in this case, however, not forever (as in the case of a right to erasure) but for a limited period of time. We have to restrict the processing of personal data when:

- a) you contest the accuracy of personal data until we agree on the correct data,
- b) we process your personal data without sufficient legal grounds (for example, beyond what we are obliged to process), however you would prefer merely restricting such data over the erasure of such data (for example, if you expect in any event to provide us such data in the future),
- c) we no longer need your personal data for the above-mentioned purposes of the processing, but you require it to establish, exercise or defend your legal claims, or
- d) you object to processing. The right to object is described in more detail below in the chapter entitled "*Right to object to processing*". For as long as we retain your data, if your claim is legitimate, we are obliged to limit the processing of your personal data.

F.6 Right of portability

You have the right to obtain from us all personal data you have provided to us yourself and which we process on the basis of the performance of the contract. We will provide your personal data in a structured, commonly used and machine-readable format. In order to easily transmit the data at your request, it can only be data that we process by automated means in our electronic databases.

F.7 Right to object to processing

You have the right to object to the processing of personal data that occurs on the basis of our legitimate interests. We will no longer process your personal data unless we have compelling legitimate grounds for continuing such processing.

F.8 Right to lodge a complaint

The exercise of your rights as outlined above does not in any way affect your right to lodge a complaint with the Office for Personal Data Protection, in the manner described below in the next chapter. You may exercise this right in particular if you believe that we process your personal data in an unauthorized manner or in violation of generally binding legal regulations.

You may lodge a complaint against our processing of personal data with the Office for Personal Data Protection located at Pplk. Sochora 27, 170 00 Praha 7.

G. How can you exercise your individual rights?

In all matters relating to the processing of your personal data, whether it be a question, the exercise of rights, filing a complaint, or anything else, you can contact us at the following e-mail address: **info@kviff.com**.

We will deal with your request without undue delay, but within one month at most. In exceptional cases, especially due to the complexity of your request, we are entitled to extend this period by another two months. We will, of course, inform you of any such extension and the reason for it.