

PRIVACY POLICY
Palatinum Campus s.r.o.

Valid from 1.12.2023

This Privacy Policy is intended to inform you of Palatinum Campus s.r.o. (hereinafter referred to as “**Company**”, “**We**” or “**Us**”) practices regarding the collection and use of your data that you may submit to us through the website www.palatinumplus.cz (hereinafter referred to as “**Platform**”).

When you use our Platform, you provide us with a variety of information, including your personal data. This Privacy Policy will primarily introduce you to the services we provide, which personal data we process, and how we use and protect such data.

With respect to changes in legislation, we might change this Privacy Policy from time to time. Please, read following paragraphs carefully. You should find all necessary information herein. If you have any further questions regarding privacy, collection or processing of your personal data, please feel free to contact us at info@palatinumplus.cz.

PERSONAL DATA

All personal data voluntarily provided to the Company by the user are collected, processed and used in accordance with applicable privacy laws and regulations, especially General Data Protection Regulation (regulation in EU law on data protection and privacy in the European Union and the European Economic Area, hereinafter referred to as “**GDPR**”). Privacy Policy covers data collection and processing carried out by the Company. The Company is not responsible for the privacy practices of any other third parties.

DATA CONTROLLER

Your personal data are processed by Palatinum Campus s.r.o..

DATA PROCESSING AND DATA RECIPIENTS

We collect personal data you provide us voluntarily while using our Platform, including your **e-mail address, name and surname, address, your location, [●]**. If you provide us with personal data of third parties, it is your responsibility to inform the person concerned and secure their consent to this Privacy Policy. We also automatically collect technical data, such as IP address, [●]. That information helps us improve your browsing experience. In certain cases, it is possible to use technical data and identify you by them as an individual, thus making them personal data according to applicable legal regulations. We also use third party services provided by external suppliers. In some cases, these services also include partial processing of personal data. The Company shares personal data with its suppliers to the necessary extent only. These suppliers are contractually bound to keep the personal data in confidence and to protect the personal data the same way as the Company does. These suppliers include, in particular, the following categories of trusted service providers: **analytics providers, providers of technical services, marketing or communication providers, banks, providers of payment services, legal, tax and accounting services.**

PURPOSES AND LEGAL BASIC FOR PROCESSING OF PERSONAL DATA

The purposes for which we use your personal data may differ based on the service we provide and the type of communication between you and us.

We process your personal data especially for the following purposes:

- to provide service;
- to provide information and products you requested from us;
- to identify the contracting party before the conclusion of the contract;
- to carry out obligations arising from any contracts entered between you and us;
- to manage your account;
- to notify you of changes to our services;
- to process your payment transactions;
- to comply with applicable laws and regulatory obligations;
- to manage our business operations and IT infrastructure;
- to understand how you use our services to give you the best browsing experience;
- to improve and develop new services based on user behaviour – using anonymised, aggregated data;
- to measure traffic on the Website;
- to keep our services secure and safe;
- to manage complaints, feedback and queries, and handle requests for data access or rectification, or the exercise of other rights related to personal data;
- for direct marketing of our services.

We process your personal data on legal basis hereunder:

- contractual obligations entered into by you and us;
- your explicit consent given to specific purposes;
- compliance with legal obligations;
- legitimate interest of the Company or third parties.

DATA TRANSFER TO COUNTRIES OUTSIDE THE EU



LENGHT OF DATA STORAGE

Personal data are stored as long as necessary for the purpose for which it was processed. The length of time that the Company holds your personal data depends on the legal basis of processing. Data processed based on performance of a contract: the data are processed for the duration of the contractual relationship and for an applicable limitation period. Processing based on your consent: personal data are processed until you revoke your consent. Data processed based on legal obligations: the data-retention period is prescribed by applicable legal regulations.

Processing based on legitimate interest: data are being processed for as long as the given legitimate interest of the Company or 3rd party (external supplier) is in place.

Bear in mind that the same data may be processed based on other legal basis, in which case your revocation of consent or request to delete all your data might not mean full erasure of your data.

DATA SAFETY

The Company is obliged to protect the user's personal data against unauthorised interference. Personal data is protected against loss, theft, unauthorized access, disclosure, alteration or destruction, using appropriate physical, technical, and administrative security measures. The Company uses number of security measures, including password protected directories and databases, SSL technologies for the encryption and secure transmission of personal data on the Internet or physical access control of the relevant hardware.

Communication between your device and servers is encrypted. Login details (including your password) are hashed and all your data are stored on servers in secure data centres with limited and carefully controlled access.

In the case of security breaches that are likely to adversely affect your privacy and occur despite security measures, we will take immediate protective precautions and notify you as soon as possible via e-mail attached to your account

USE OF COOKIES

We use cookies to provide our users and clients with the best services. Cookies are small files stored by websites on the hard drive of a user's device; these are not used to obtain personal data about users (obtained information could include the user's IP address or the type of browser used) but rather to distinguish individual users connecting to Company websites.

Our websites may also contain third party cookies. Company uses these to obtain anonymous usage statistics of individual websites, such as the number of visitors and typical user behaviour. These third parties typically do not store any personal data in relation to the use of cookies since they do not have access to the identity of the Company service user (under the assumption that the user is not a registered user of the products by such a third party – e.g. Google).

The use of Cookies can be modified, i.e. disabled, deleted, etc. in the browser settings or via the cookie bar.

RIGHTS RELATED TO PERSONAL DATA

Under the GDPR, the user is granted certain rights related to the processing of his personal data. The Company is obliged to use, collect and process personal data in such a way that the user and other persons do not suffer harm to their rights.

Every user of our services has the following rights, which we fully respect:

- **Transparency**

Whenever you enter personal data within Company services, we always transparently inform you of the purpose for which the entered data may be used, who uses these data, and who the controller is. This document is part of any such guidance that refers to it.

- **Right of access to your personal data and data portability**

The owner of the data is authorized to receive a confirmation of whether his/her personal data are being processed, and if so, then he/she is authorized to gain access to such personal data. This means that, upon request, we provide our users with all information about the processing of those personal data where we have the position of controller of personal data (a request can be sent via e-mail to info@palatinumcampus.cz. If a user of our services wishes to receive information regarding the personal data they provided to a client, in this case, they should contact the client who holds the position of administrator of personal data.

If you want Company to transfer your personal data that it processes on the basis of consent or data that are necessary for the performance of a contract to a third party, you can exercise your right to data portability. If the exercise of this right would adversely affect the rights and freedoms of others, Company will not be able to comply with your request.

- **Right to rectification**

If an applicant discovers that some of their personal data are incorrect or not being processed correctly, he/she is authorized to have the personal data corrected as soon as possible (the request can be sent by e-mail to info@palatinumcampus.cz.

- **Right to be forgotten**

If personal data are being processed for a specific purpose and at some point, no longer become necessary for that purpose, we will automatically delete them. If personal data are being processed based on consent and the owner of the data withdraws his/her consent, we also delete them. Here, however, it is necessary to note that we only delete personal data for which we hold the position of controller, including for all joint controllers. For personal data held by our clients, it is necessary to apply to the clients who are controllers of the given personal data for the right to be forgotten. Furthermore, it is necessary to specify that the right to be forgotten is not absolute, and if we have an objective obligation to maintain the data (e.g. accounting), then we will only delete the personal data that are no longer necessary for the original purposes of processing.

Requests for erasure of personal data can be sent by e-mail to [•]. You acknowledge that in case the consent to personal data processing is withdrawn, such a withdrawal shall not affect the lawfulness of processing based on consent before its withdrawal.

- **Right to limit processing**

The owners of personal data have the right to limit the processing of his/her personal data (a request can be sent by filling in a contact form or by sending an e-mail to [•]), if:

- i) the owner of the data disputes the accuracy of the data – for the period necessary for the controller to verify the accuracy of the personal data; or
- ii) the processing is illegal and the owner refuses the deletion of personal data but instead requests that their use be limited; or
- iii) the controller no longer needs the personal data for processing, but the owner requires them for legal reasons; or iv) the owner of the data makes an objection to their processing – until determining whether the justified interests of the controller supersede the justified interests of the owner of the data.

- **Right to protection of privacy**

If a user of Company services discovers or believes that Company is processing his/her personal data in a way that violates the protection of his/her personal and private life and/or illegally, especially if the personal data are inaccurate with respect to the purpose of their processing, he/she may request that Company provide an explanation or request that Company remedy the situation; this may especially refer to blocking, corrections, amendments, or deletion of personal data (the request may be sent by e-mail to justified interests of the owner of the data.).

In the event of repeated or manifestly unjustified requests to exercise the aforementioned rights, Company is entitled to charge a reasonable fee for the exercise of the right in question or to refuse to exercise it. We would inform you in advance of such action.

Company reserves the right to verify the identity of the applicant in a reasonable manner in accordance with Article 12(6) GDPR in relation to the rights exercised.

If Company does not comply with the Company service user's request as per the previous sentence, then the Company service user is authorized to contact the Office for Personal Data Protection.

We always process your personal data on the legal basis listed in this Privacy Policy. If we process your personal data on the basis of a legitimate interest, you have the right to object to such processing. If you wish to file a complaint in regard to the processing of your personal data by the Company, please feel free to contact us at [•]. The Company resolves objections and other inquiries related to data processing within one (1) month and informs you how we solved your request.

The authorized person for the protection of personal data at Company is:

[•]

You also have the right to lodge a complaint with our supervisory authority seated in the Czech Republic, Prague (the country and city of the Company residence): Holubova 1, Praha 5 150 00 – Czech Republic

The Office for Personal Data Protection

Adress: Pplk. Sochora 27, 170 00 Prague, Czech Republic

If any problem related to you privacy or data protection on Platform occurs, please always contact the Company first and we will gladly try to solve such problem towards your satisfaction.

CONCLUSION

This Privacy Policy enter into force on [•] and are available online on the website of Company. Company is authorized to change this Privacy Policy using the procedure used to change the conditions of use of Company services.

Your personal data are kept private and safe and remain fully under your control.