

## PRINCIPLES FOR THE PROCESSING AND PROTECTION OF PERSONAL DATA

### 1. Personal Data Controller.

The personal data controller is Bestsport, a.s., with its registered office at Prague 9, Českomoravská 2345/17a, ZIP: 190 00 Prague, ID No: 24214795, registered at the Commercial Register administrated by the Municipal Court in Prague, Section B, Insert 17875 (hereinafter referred to as "**Bestsport, a.s.**") or "**Controller**"). The Controller is the owner and operator of

- the so-called **O<sub>2</sub> arena** (ie. part of building No. 2345, on the plot parc. No. 3343/35, cadastral area Libeň, at the address Českomoravská 2345/17a, ZIP: 190 00 Prague),
- the so-called **O<sub>2</sub> universum** (ie. parts of building No. 2345, on plots parc. No. 3343/32, 3343/109 and 3343/110, cadastral area Libeň, at the address Českomoravská 2345/17, ZIP: 190 00 Prague),
- the so-called **Parking house** (ie. building No. 2422, on the plot parc. No. 3344/36, cadastral area Libeň, ZIP: 190 00 Prague),
- the so-called **STAGES HOTEL Prague** (ie. building No. 2521, on plots parc. No. 3343/49 a 3343/90, cadastral area Libeň, at Českomoravská 19a, ZIP: 186 00 Prague),
- and the operator of part of the service of the so-called **Forum Karlín** (ie. building on the plot parc. no. 408, cadastral area Karlín, at the address Pernerova 51, ZIP: 186 00 Prague)

(O<sub>2</sub> arena, O<sub>2</sub> universum, Parking House, STAGES HOTEL Prague and Forum Karlín together as "**Buildings**").

### 2. Lawfulness of the processing of personal data.

Personal data is obtained and processed by the Controller in accordance with the 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, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter referred to as "**GDPR**")

### 3. Definition of personal data.

The Controller collects personal data that are communicated to him directly by the data subject, either on the basis of consent or in connection with the conclusion of a contract

between the data subject and the Controller or any other legal act carried out between the data subject and the Controller, personal data obtained through the camera system in the Buildings and their surroundings and personal data obtained during a visit to the Buildings. Personal data provided in this way are usually the name, surname, e-mail address, contact details (telephone No., mobile phone No., address, contact address), personal ID card number, photographs for the purpose of introduction into the system in the case of repeated entries into one of the Buildings, in the case of camera recordings photographs or other image recordings of data subjects and in the case of purchases by the data subject also information about this purchase (in particular the type of goods / services, price, quantity, method of payment) or other personal data that the data subject communicates to the controller (hereinafter also referred to as "**personal data**").

#### 4. Purpose of personal data processing.

The Controller processes the personal data for the following purposes and on the basis of the following titles:

- a. in the case of **submitting an e-mail address for sending a newsletter on the** Controller's website, the purpose of personal data processing is to send marketing messages and news from the Controller's business, based on **consent to this processing**; the purpose may also be to send operational and informational messages on the operation of the Buildings (e.g. information on security measures for events, etc.); the e-mail address is provided by the data subject for this purpose voluntarily and the consent is not a prerequisite for the provision of any service or sale of the controller's goods.
- b. in **the case of the purchase of goods/services** from the Controller, the purpose is to fulfil the contract, or to communicate operational and other information on the purchased goods/services necessary for the use of the goods/services, on the basis of **the concluded contract**; the purpose may also be to send operational and information messages for the operation of the Buildings (e.g. information on security measures for events, etc.); the purpose may also be the internal need of Bestsport, a.s., especially for the protection of the rights and legitimate interests of Bestsport, a.s., for the creation of statistics and analyses, for improving services and their quality and, if necessary, for their adaptation, for the analysis of business opportunities, etc.; In the case of the purchase of goods/services, the provision of personal data is a prerequisite for the conclusion of a valid contract, without which the contract cannot be concluded; in the case of the purchase of goods /services of the Controller, **personal data are also processed for the purpose** of sending a newsletter (marketing messages); against the processing of personal data for the purpose of direct marketing, which is carried out without consent, the data subject has the right to object to the Controller at any time free of charge, by written message sent via e-mail to the e-mail address [osobniudaje@bestsport.cz](mailto:osobniudaje@bestsport.cz) or in writing to the address of the controller's registered office;

- c. in the case of consent to the processing of personal data by the Controller **on the website of the Ticket Operator** of the Controller (the company is responsible for, inter alia, the **Controller**. tickets for events held in the Buildings of the O2 arena, O2 universum or Forum Karlín) is the purpose of processing personal data by sending marketing communications and news from the controller's business, based on **consent to this processing**; the purpose in this case may also be to send operational and information messages on the operation of the Buildings (e.g. information on security measures for events, etc.), statistical evaluation of visitors to events held in the Buildings and other analytical evaluation for the purposes of the Controller; personal data is provided by the data subject for this purpose voluntarily and consent is not a prerequisite for the provision of any service or sale of goods by the controller or a third party;
- d. in the case of **monitoring of the premises** (Buildings) and the surroundings of the Controller's premises (Buildings), the purpose is to protect the property, safety and other legitimate interests of the Controller, the Controller's employees and other persons located in these premises (including event organisers); the camera recordings are held for 21 days from the date of acquisition (information on the camera recordings is provided separately) , or 48 hours from the moment of acquisition in the case of the Parking House; the provision of such personal data is a prerequisite for entering the Buildings and their surroundings and the reason is the **legitimate interests of the Controller**;
- e. in **the case of live transmission** to screens, the purpose is to provide services to customers at selected events – live transmission from the auditorium to large screens inside the hall, serving for the provision of services such as entertainment during breaks, etc. ; the provision of such personal data is a prerequisite for entry into some of the Buildings and the reason for the **legitimate interests of the Controller**; the live transmission is always carried out in such a way that it complies with Act No. 89/2012 Coll., the Civil Code, as amended (hereinafter referred to as the "CC");
- f. in the case of **a visit to the O2 arena or O2 universum through a personnel reception** (i.e. for the purpose of visiting one of these Buildings outside the events) without the use of a ticket, the purpose is to protect property, security and other protected interests of the Controller; the provision of such personal data is a prerequisite for entry to the O2 arena building or O2 universum and the reason is usually **the legitimate interests of the Controller** – without providing the said data, access to the said Buildings may be denied;
- g. in the case of creating **recordings of events**, the purpose is the legitimate interest of the Controller as (i) the operator of the Buildings or (ii) as the organizer of the event, namely to capture the artistic performance, mood and atmosphere in the audience, promotion of the event or future events and other commercial use of such records by the Controller, while the processing may take place, for example, on the Controller's social networks, the Controller's website, in a magazine published by the Controller and other media; such records are made from each event held in the Buildings of the O2 arena, O2 universum and Forum Karlín and usually information about the recording is also provided for the respective event on the event website

([www.o2arena.cz](http://www.o2arena.cz) or [www.o2universum.cz](http://www.o2universum.cz) or [www.forumkarlin.cz](http://www.forumkarlin.cz)); the provision of such personal data is a prerequisite for entering the buildings of the O2 arena, O2 universum or Forum Karlín for the purpose of visiting the relevant event and thus concluding a contract for the sale of tickets for the event; records are made in accordance with the CC, in particular within the meaning of Sections 88 and 89 of the CC for reportage and artistic purposes and the protection of the Controller's rights;

- h. in the case of **using the web form on the** Controller's website (or by sending an e-mail in relation to the following categories), the purpose of the processing of personal data is the provision of a service to the data subject by the Controller – provision of information, processing of the request, processing of the complaint, processing of the demand for the provision of services, etc., whereby:
- i. in the case of the Events and Tickets category, this usually involves the processing of a complaint or the provision of information about a specific event held in the O2 arena Building, O2 universum or Forum Karlín (information on the time of the event, the ticket price, identification of the event organizer, etc.),
  - ii. in the case of the category Rental of premises, this usually involves the processing of the demand for the lease of premises in the Buildings;
  - iii. in the case of the Job and Part time job category, this usually involves the processing of an application for employment/offer of labour to the Controller;
  - iv. in the case of the Categories Suggestions and Comments and Other, this usually involves the processing of personal data for the purpose of providing advice, information or complaint;
  - v. in other cases, it is usually the settlement of the request/complaint/complaint of the data subject.

In any case, the provision of personal data is voluntary on the part of the data subject, both in terms of the provision of such data and the scope of the personal data provided; the reason for the processing is thus usually the **consent of the data subject**, which the data subject grants by sending a request via a web form for the Controller to process the personal data for the purposes mentioned above;

- i. in the case of **business contractual relations** between the Controller and the supplier/customer, the purpose is the performance of the contract, or the communication of operational and other information for performance under the contract, on the basis of a **concluded or concluded contract**; the purpose may also be the internal need of Bestsport, a.s., especially for the protection of the rights and legitimate interests of Bestsport, a.s., for the creation of statistics and analyses, for improving services and their quality and, if applicable, their adaptation, for analysis of business opportunities, etc.; the provision of personal data of acting and sometimes contact persons is a prerequisite for the conclusion of a valid contract, without which the contract cannot be concluded;
- j. in the case of **a request by the data subject** to the Controller, the purpose of the processing of personal data is to perform the Controller's duties within the meaning of the GDPR and to record the implementation of such an obligation in accordance

with the GDPR, while processing personal data provided by the data subject, usually to the extent of name, surname, contact (e-mail, telephone, address) and the methods and date of delivery of the request and the method and date of its processing, where applicable, other data that are necessary for the identification of the application and its processing in accordance with the GDPR.

- k. in the case of negotiations on the conclusion of an employment relationship, the purpose of processing personal data is the processing of the application necessary for the conclusion of the employment relationship, while the personal data provided by the data subject are processed, usually to the extent of name, surname, contact (e-mail, telephone, address), education, previous experience and other relevant data.

5. Source of personal data.

The source of personal data is:

- a. the data subject (whether directly by communication to the Controller or by his activity on social networks on profiles managed by the Controller or through cookies, if the data subject has allowed it or e.g. via e-mail or web form on the Controller's website);
  - b. the employer of the data subject (e.g. when providing the contact details of its employees) or another personal data intermediary of the data subject who communicates them with the knowledge/consent of the data subject;
  - c. CCTV in the premises of Bestsport, a.s. (Buildings) and surroundings of the establishment of Bestsport, a.s. (Buildings) making a recording;
  - d. cameras of Bestsport, a.s. as the operator of the Buildings or the organizer of the event, when recording an event held in one of the Buildings;
  - e. public registers of entrepreneurs (Commercial Register, Trade Register, list of VAT payers, cadastral databases and other professional publicly accessible registers).
6. Consent to submit an e-mail address.

If the processing of personal data takes place on the basis of 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 an e-mail address in the appropriate column, click the granting of consent, confirm familiarization with this policy in the appropriate column and confirm in the sent e-mail that the e-mail address was entered by an authorized person. If the submitted e-mail is not confirmed via the provided link, the submitted e-mail will not be registered in the Controller's database or otherwise processed.

7. Accuracy of personal data.

By submitting and providing personal data to the Controller (eg. on the website [www.o2arena.cz](http://www.o2arena.cz) / [www.o2universum.cz](http://www.o2universum.cz) / [www.forumkarlin.cz](http://www.forumkarlin.cz) / [www.stageshotel.com](http://www.stageshotel.com), when purchasing goods or services, etc.), the personal data

provider confirms the legitimacy to provide such personal data as well as its correctness and completeness.

#### 8. Processors.

By processing personal data, including sending commercial messages to Bestsport, a.s., the Controller may entrust external entities that provide the Controller with administrative or professional or technical support, or perform marketing, business or other specific activities (hereinafter referred to as "**Processors**"); these external entities are contractually bound to comply with the principles of personal data processing in accordance with the GDPR and other applicable legal regulations as well as Bestsport, a.s. The Controller uses the services of the Processors within the meaning of this Policy for

- a. Marketing services and communication, taking photos and videos, operating social networks and websites;
- b. Operation of the accounting system (technical support);
- c. Organizing and security services, camera system support;
- d. Ticketing services;
- e. Legal and payment services;
- f. Hotel reservation services and processing of accommodation requests or use of membership points/programs.

#### 9. Third-party access.

The Controller may also disclose personal data to public authorities for legal reasons and, to the extent necessary, to other entities to protect the rights of the Controller (e.g. courts, authorities active in criminal proceedings, etc.). The recipients of personal data are listed below.

#### 10. Processing time.

Personal data is processed by the Controller

- a. for a maximum period of 10 years from the subscription to the newsletter and thus the granting of consent to the processing of personal data, respectively until the data subject withdraws his consent;
- b. for the period specified with regard to the purpose of processing personal data, to the extent necessary, if the personal data are processed on the basis of a title other than consent (in particular, for the period for exercising rights arising from liability for defects or a guarantee for goods or services purchased from the Controller (usually two years), for the period for exercising the rights of the Controller against his debtors (usually three years), keeping tax documents for the needs of tax administration (usually ten years), etc.), unless otherwise stated below;

- c. for the period specified in the consent granted, if the personal data are granted with the consent of the data subject,
- d. for a period of 21 calendar days in the case of recordings from CCTVs monitoring the premises of the Controller (Buildings) or the surroundings of the Controller's premises (Buildings), or 48 hours in the case of the Building – Parking House, see separate information on camera recordings,
- e. for a period of 10 years in the case of recordings from the event Bestsport, a.s. as the organizer of the event,
- f. for the time necessary for the processing of a request delivered to the Controller via the web form on the Controller's website, but no more than 10 years from the time of providing such data, unless otherwise stated in the relevant form;
- g. for a period of five years from the date of obtaining personal data processed for the purpose of direct marketing when purchasing the Controller's goods or services, unless such data are provided on the basis of consent (in which case the period specified in the consent applies);
- h. for a period of five years from the sending of the response to the data subject's request in relation to the controller in the sense of exercising the data subject's rights under the GDPR (e.g. a request for communication of what data the Controller processes, etc.)
- i. for a period of two months after the end of the selection procedure to fill a position or two months after sending a CV without a selection procedure in the case of sending a CV to Bestsport, a.s., if no consent for longer processing is granted; the name, surname and position for which the data subject applied are processed for two years from the moment of their communication to Bestsport, a.s.

After the end of the period of authorized processing, for example by the termination of this service or upon request in justified cases, the Controller will stop processing the personal data and the personal data stored with the Controller or processor will be destroyed/deleted in accordance with applicable law.

#### 11. Form of processing and security.

The Controller processes the data provided automatically and manually with the possibility of their mechanical processing, securely, in accordance with technical and security mechanisms that ensure the maximum possible protection of the processed data (in particular against unauthorized access or transmission, against their loss or destruction or other misuse)

#### 12. Type of processing.

Personal data will be processed in particular in the form of collection, sorting, recording, organizing, structuring, storage, adaptation, alteration, retrieval, viewed, used, made available, including making available by transmission, disseminated, combined, limited, destroyed, deleted, etc.

13. Automated decision-making.

The Controller shall not carry out automated decision-making, including profiling, which would have legal effects for the data subject or similarly significantly affect him/her. Automated processing with profiling elements is carried out only in the case of sending newsletters (marketing messages) on the basis of a previous purchase of goods / services from the Controller or ticket operator of the Controller, and only to the extent of sending newsletters for similar products of the Controller that the data subject has purchased from the Controller or ticket operator.

14. Withdrawal of consent.

The consent given can be withdrawn at any time with effect for the future. Withdrawal of consent may be made in writing by sending a written withdrawal of consent to the address Bestsport, a.s., Prague 9, Českomoravská 2345/17a, ZIP: 190 00 Prague or electronically, by sending an e-mail to the e-mail address [osobniudaje@bestsport.cz](mailto:osobniudaje@bestsport.cz). In the case of a newsletter (marketing messages), the method of withdrawal of consent is stated directly in the newsletter.

15. Information on the rights of the data subject.

Personal data subjects have the following rights:

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

The data subject has the right to request information on what personal data the Controller processes about the subject in writing by post at Bestsport, a.s., Prague 9, Českomoravská 2345/17a, ZIP: 190 00 Prague or at the e-mail address [osobniudaje@bestsport.cz](mailto:osobniudaje@bestsport.cz). Only in accordance with the GDPR may the Controller request the right to reimbursement of the costs associated with the provision of this information. Upon request, the Controller shall provide copies of the processed personal data in accordance with the GDPR. This right to obtain a copy shall not adversely affect the rights and freedoms of other persons.

b) **Right to correction:**

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

c) **Right to erasure:**

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

- i. the personal data are no longer needed for the purposes for which they were collected or otherwise processed;
- ii. the data subject has withdrawn the consent on the basis of which the personal data of the data subject were processed and there is no other legal reason for their processing;



- iii. the data subject has objected to being the subject of a decision based on automated processing of the data subject's personal data and there are no overriding legitimate reasons for such processing or the data subject has objected to the processing of the data subject's personal data for direct marketing purposes;
  - iv. the personal data of the data subject have been unlawfully processed;
  - v. the personal data of the data subject must be erased in order to comply with a legal obligation laid down in European Union or member state law to which the Controller applies;
  - vi. the personal data of the data subject have been collected exclusively in connection with the offer of information society services.
- d) **Right to restriction of processing:**  
The data subject may request the Controller to restrict the processing of personal data of the data subject if any of the following situations occur:
- i. the data subject has denied the accuracy of the personal data of the data subject, for the period necessary for the Controller to verify the accuracy of the personal data;
  - ii. the processing of personal data by the data subject is unlawful, but the data subject opposes the erasure of such data and instead requests the restriction of their 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 defence of legal claims;
  - iv. the data subject has objected to the processing of personal data by the data subject pursuant to Article 21 (1) GDPR until it has been verified whether the legitimate reasons of the Controller outweigh the legitimate reasons of the data subject.
- e) **Right to data portability:**  
In cases of processing of personal data based on consent or a contract and processed by automated means, the data subject shall have the right to obtain personal data relating to the data subject which the data subject has provided to the Controller and the right to transmit such data to another Controller in a structured, commonly used and machine-readable format, provided that this right shall not adversely affect the rights and freedoms of other persons.
- f) **Right to object:**  
The data subject may at any time object to the processing of personal data of the data subject carried out on the basis of the legitimate interest of the Controller and for the purposes of direct marketing carried out on the basis of the legitimate interest of the controller.
- g) **Right to be informed:**  
The data subject has the right to be informed by the Controller in the event of a personal data breach of the data subject, where it is likely that the case will 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 shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects for the data subject or similarly significantly affects the data subject.

16. **Change of personal data.**

In the event that the personal data changes, the data subject is obliged to notify the Controller of this change in the situations specified in the relevant regulation, otherwise the proper and correct processing of the personal data provided cannot be guaranteed.

17. **Place of exercise of rights.**

All rights (appeal, objection, etc.) can be exercised by the data subject

- a. **in writing by post** at the Controller's address: Bestsport, a.s., Prague 9, Českomoravská 2345/17a, ZIP: 190 00 Prague;
- b. **in person at the** Controller's address: Bestsport, a.s., Prague 9, Českomoravská 2345/17a, ZIP: 190 00 Prague;
- c. **by sending an** e-mail to the e-mail address of the [osobniudaje@bestsport.cz](mailto:osobniudaje@bestsport.cz)
- d. **electronically in the form** on the <https://www.o2arena.cz/en/contact/> (category Personal Data);

The data subject may also file a complaint with the Office for Personal Data Protection, Pplk. Sochora 727/27, ZIP: 170 00 Prague 7-Holešovice, [posta@uouu.cz](mailto:posta@uouu.cz).

18. **Recipients.**

Personal data may be provided to the following recipients:

- a. **From the Controller's employees** - provider of security and organizational services, event organizers, ticket operator (ticket seller), media service provider (especially media campaign processor), web service provider (especially hosting), providers of service and support services of IT systems Controller or systems from the workers, the franchisor in the case of the operation of the Hotel (especially the reservation system, membership system), the provider of reservation services (incl. online platforms);
- b. **Law enforcement agencies;**
- c. **Other public authorities** in the event of a legitimate request or due to legal obligations of the Controller or the relevant Processor
- d. **Event organizers**, in the case of a recording from a camera recording, the data subject has been informed in advance of the processing (e.g. in the instructions of the event organizer) and the organizer requests the recording for reasons of ensuring or investigating security or order at the event, compliance with the rules of the event (e.g. ELH or other rules) or the

organization of the event that they organize/organized in the operations of Bestsport, a.s.

19. Cookies.

Bestsport, a.s. may use cookies on its website for its business and marketing purposes. In this case, when visiting the [www.o2arena.cz](http://www.o2arena.cz), the user is informed about cookies and asked for 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 modified policy on the [www.o2arena.cz](http://www.o2arena.cz)/[www.o2universum.cz](http://www.o2universum.cz)/[www.forumkarlin.cz](http://www.forumkarlin.cz)/[www.stageshotel.com](http://www.stageshotel.com) page.