

## Information on Personal Data Processing

### I. Introductory Provisions

1. The company "Tanec pro všechny, z.s.", with the registered office at Prague 3, Plavínová 2783/20, post code 13000, company registration number: 22709908, incorporated in the Commercial Register kept by the Municipal Court in Prague, Section L, Insert 24791 (hereinafter referred to as "Tanec pro všechny") provides services in the teaching of social and sports dance and holding of cultural and social events ("Services") under the trademark "Tanec pro všechny, z.s." (hereinafter referred to as "Tanec pro všechny"). Tanec pro všechny hereby informs the data subjects that come into contact with Tanec pro všechny about the collection and processing of personal data, handling of personal data and the privacy policy (hereinafter referred to as the "Policy"). The aim of this Policy is to provide the data subjects with the necessary information, in particular in accordance with European Parliament and Council (EU) Regulation 2016/679 of 27 April 2016 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/ES (GDPR).
2. The contents of the Policy include the following areas:
  - a. What personal data we will process;
  - b. For what purposes and how we will process personal data;
  - c. To whom personal data may be transferred;
  - d. How long we will process personal data;
  - e. What are the rights of data subjects in relation to the protection of personal data.
3. In case you need any part of the text to be explained, to receive advice and/or discuss further processing of your personal data, you can always contact us at [info@tanecprovsechny.cz](mailto:info@tanecprovsechny.cz).
4. For the purpose of this Policy:
  - A data controller means a person who, alone or together with others, determines the purposes and decides how personal data will be processed, i.e. Tanec pro všechny, z.s., with the registered office at Prague 3, Plavínová 2783/20, post code 13000, company registration number: 22709908, incorporated in the Commercial Register kept by the Municipal Court in Prague, Section L, Insert 24791 that operates Tanec pro všechny.
  - A data subject means a natural person, both an entrepreneur and non-entrepreneur, whose personal data have been transferred to and processed by Tanec pro všechny and such person is a client of Tanec pro všechny or a service within the Tanec pro všechny activity is arranged for the client.
  - Personal data mean any information about the identified or identifiable natural person as the data subject (e.g. name, address, phone number, email and others). Their detailed overview will be provided below.
5. In processing personal data, Tanec pro všechny proceeds in accordance with the following legal regulations, in particular:
  - Personal Data Protection Act No. 101/2000 Sb.,
  - European Parliament and Council (EU) Regulation 2016/679 (hereinafter referred to as the "Regulation"),

- Act No. 563/1991 Coll. on accounting, as amended, Act No. 89/2012 Coll., the Civil Code, Act No. 634/1992 Coll. on consumer protection, possibly in accordance with other legal regulations, and ensures that the data processing principles according to Article 5 of the GDPR are complied with and adhered to.

## **II. Scope of Personal Data Processing**

1. Tanec pro všechny processes the following categories of personal data provided by the data subject in connection with the order of services, conclusion of the contract and performance of the services incl. in connection with the website [www.tanecprovsechny.cz](http://www.tanecprovsechny.cz), [www.taneckyprodeti.cz](http://www.taneckyprodeti.cz), [www.praguedance.cz](http://www.praguedance.cz), [www.dancetimecup.cz](http://www.dancetimecup.cz), [www.svatebni-tanec-praha.cz](http://www.svatebni-tanec-praha.cz), [www.kurzy-tance-praha.cz](http://www.kurzy-tance-praha.cz), [www.den-stardance.cz](http://www.den-stardance.cz), [www.ballroom-dance.cz](http://www.ballroom-dance.cz) (hereinafter referred to as the "Website"), or with a request to receive newsletters: name and surname, address, email, phone, parent's contact information, study information, information on ISIC membership, billing and transaction details (these are, in particular, information appearing on invoices, agreed billing conditions and payments received), date of birth (in accordance with the principle of minimisation - this applies primarily to children and junior clients), information from mutual communication (information from emails or other contact forms). The personal data collected may also include, if any, photographic records of the data subject in normal documentary quality taken at the premises of the courses and events.
2. We do not track you on our Website, so only your personal information that you explicitly disclose to us will get to us.

## **III. Purposes and Time Periods of Personal Data Processing**

1. Tanec pro všechny processes the above categories of personal data for the following purposes:
  - a. Ensuring the proper conclusion and subsequent fulfilment of the contractual obligation to Tanec pro všechny services (such as participation in dance lessons, dance seminars, workshops, cultural and social events, regular instruction and other) within the meaning of Article 6 (1) (b) of the GDPR.
    - i. Personal data are processed for the duration of negotiations for the conclusion of a contract for the Tanec pro všechny services, for the duration of the contractual relationship and subsequently for 3 years from the termination of the relevant service. The provision of such personal data is a necessary condition for concluding a contract.
  - b. Furthermore, legal obligations arise upon Tanec pro všechny from the contractual commitment, which is why we must also process personal data for this purpose within the meaning of Article 6 (1) (c) of the GDPR. These include, in particular, accounting, tax obligations (for example, according to Act No. 563/1991 Coll. on accounting, under which invoicing details are processed and maintained, or according to Act No. 235/2004 Coll. on value added tax) and archiving obligations, provision of assistance to administrative authorities, the police, courts, etc. These personal data will always be processed for a period stipulated by law.
  - c. In accordance with the assessment of the priority of interests, consequences and impacts, we further process personal data within the legitimate interests of Tanec pro všechny, including the protection of rights and the legally protected interests of Tanec pro všechny.

- i. We see a legitimate interest in the right to an effective defence in the event of a dispute. Data are processed for a period of 3 years from the termination of the provision of service under the contract and the retention period is extended by the duration of the dispute.
    - ii. The legitimate interest of Tanec pro všechny is also to send commercial notices in accordance with section 7 (3) of Act No. 480/2004 Coll. on certain information society services and in accordance with Article 47 of the GDPR. Tanec pro všechny sends information to its clients about related similar services (extra lessons, balls, dance and cultural events, follow-up courses, related competitions and workshops) especially during the period of service provision and subsequently for a maximum period of 3 years after service termination.
  - d. Tanec pro všechny newsletter as a marketing activity of Tanec pro všechny;
    - i. Beyond the given purposes and titles of legality of processing, Tanec pro všechny also allows persons who have not been Tanec pro všechny clients yet to subscribe to newsletters. That is, outside the legitimate interest as part of the provision of services. In such a case, the processing is by consent within the meaning of Article 6 (1) (a) of the GDPR. In this context, only email with information about the age of over 16 is processed, which is voluntarily provided by the data subject electronically via the Tanec pro všechny Website. This information is not provided to any third party and is only used to send newsletters about the Tanec pro všechny services to an approximate extent of once a month. This consent can be revoked at any time by clicking in the newsletter, by email to [info@tanecprovsechny.cz](mailto:info@tanecprovsechny.cz). The data are processed for a period of 3 years from their provision.

#### **IV. Legal Basis for the Processing of Personal Data**

1. For the sake of simplicity, it can be summarised that the lawfulness of processing is given by Article 6 (1) of the GDPR, according to which processing is lawful where necessary for the performance of a contract, the fulfilment of a legal obligation, the protection of legitimate interests or processing takes place based on consent. We have described the individual processing titles above. In case of interest it is possible to request an even closer overview according to your rights described below.

#### **V. Transfer of Personal Data to Third Parties**

1. We must provide personal data to public authorities, such as tax authorities, courts, law enforcement or capital market supervision authorities, within the legal limits.
2. Personal data may also be transferred to our subcontractors and processors for the performance of the contract, such as: postal and courier operators (sending information letters, invitations to paid lessons or events, etc.), accounting office, law firm, graphic studio, course tutors. The transfer of personal data will always be in accordance with the principle of minimisation and only for the specific purpose expressed.
3. We do not intend to pass on your personal data to other entities for the purpose of offering third party services.

4. We will not pass on personal data to countries outside the European Union or the European Economic Area, or to any international organisation.

## **VI. Time Period of Personal Data Processing**

1. We have described the time period of personal data processing by Tanec pro všechny in Article III of this Policy. However, in accordance with the principle of transparency and comprehensibility of the transmission of information, it is possible to summarise as follows:
  - a. We will process your personal data for as long as we provide you with our services or perform a mutual agreement, or for a period necessary to fulfil the archiving obligations under the applicable legislation, such as the Accounting Act, the Archiving and Records Act or the Value Added Tax Act.
  - b. Personal data will be processed and kept for at least the duration of the contract. Some personal data needed e.g. for tax and invoicing obligations will be kept longer, usually 5 or 10 years (in particular in accordance with the relevant provisions of the Accounting Act or the Value Added Tax Act), starting with the year following the occurrence of the kept information.
  - c. We will keep the personal data necessary to assert our legitimate interests for a maximum of three (3) years from the end of our contractual relationship with you.
  - d. Personal data processed for marketing purposes (newsletter) will be kept for a maximum of three (3) years from the date of their obtaining.
  - e. Personal data will never be kept longer than the legal maximum. After the expiry of the archiving period, personal data will be safely and irrevocably destroyed so that they cannot be misused.

## **VII. Origin of Personal Data**

1. Tanec pro všechny obtains personal data directly from the data subject, in particular from the completed forms, mutual communication or personally concluded contracts. In addition, personal data may also come from publicly available sources, registers and records, such as the commercial register, professional registers, etc. However, such a case occurs exceptionally (in particular when rectifying the data provided, fulfilling legal obligations, cooperating with public authorities or in other activities within the legitimate interests).
2. There may be situations where Tanec pro všechny obtains personal data from a person other than the data subject in connection with the submission of an application or order. In that case:
  - a. As part of the application, order, we instruct the person completing the application in writing to enter personal data of all subjects with their cooperation or at least with their knowledge and consent.
  - b. Subsequently, we send information by e-mail to all subjects about entering personal data into our system in order to conclude a contract and provide a service. This is accompanied by the wording of our Policy and the Terms and Conditions of Tanec pro všechny for the purpose of proper information.

- c. At the same time, within the framework of an e-mail with information, we give the possibility to expressly disagree in a simple form with the processing of personal data and prevent such processing.

## **VIII. Related Information on Processing**

1. If a subject does not provide his/her personal data, it is not possible to conclude the relevant contract with Tanec pro všechny and to provide services resulting therefrom. Personal data contained in the application or order for Tanec pro všechny are in this context necessary for the provision of a specific service. Information within the meaning of Article III (1) (d) of this Policy is voluntary and is not a condition for concluding a contract.
2. The subject is required to provide only true and accurate personal data. The subject is responsible for the correctness, accuracy and truthfulness of the personal data provided. Tanec pro všechny is not responsible for the accuracy of the data provided.
3. Personal data are and will be processed electronically and Tanec pro všechny does not make automated decision making or profiling.

## **IX. Rights of Data Subjects Related to Processing**

1. Tanec pro všechny informs its clients, as data subjects, that they have the following rights in connection with the protection of personal data, which we describe below for the sake of greater comprehensibility and clarity:
  - a) To require access to personal data
    - a. The data subject is entitled to request information as to whether or not his/her personal data are processed and, if so, he/she has access to the information about the purposes of processing, categories of the personal data concerned, recipients or categories of recipients, retention period of personal data, information on his/her rights (right to request rectification or erasure, restrictions on processing, to object to such processing), the right to file a complaint to the Office for Personal Data Protection, information about the source of personal data, information as to whether there is automated decision-making and profiling and information about the procedure used as well as the importance and foreseeable consequences of such processing, information and guarantees in the case of transfer of personal data to a third country or international organisation. The participant has the right to be provided with copies of the processed personal data. However, the right to obtain such a copy may not adversely affect the rights and freedoms of others.
  - b) To the rectification of the personal data provided
    - a. If, for example, there has been a change in the place of residence, phone number or any other fact that can be considered a personal data, the data subject has the right to request the controller to rectify the processed personal data. In addition, the data subject has the right to the completion of incomplete personal data, including by providing an additional declaration.
  - c) To the erasure of the personal data provided
    - a. In certain specified cases, the data subject has the right to require the controller to erase the personal data. Such cases include, for example, a fact that the data being

processed are no longer needed for the above purposes. The controller automatically erases personal data after the expiry of the necessity period but the data subject may contact the controller at any time. The request is then subject to an individual assessment (despite the right to be erased, the controller may have an obligation or a legitimate interest to retain personal data) and the data subject is informed in detail about its disposal.

- d) To the limit of the personal data processing
    - a. The controller processes personal data only to the extent necessary. However, if the data subject feels that, for example, the controller exceeds the above purposes for which it processes personal data, he/she may request that his/her personal data be processed solely for the strictest legal reasons or that personal data be blocked. The request is then subject to an individual assessment and the data subject is informed in detail about its disposal.
  - e) To file a complaint with the Office for Personal Data Protection
    - a. The data subject may at any time contact with his/her suggestion or complaint relating to personal data processing to a supervisory authority, namely the Office for Personal Data Protection, with the registered office at Pplk. Sochora 27, 170 00 Prague 7, website <https://www.uoou.cz/>.
  - f) The right to the transfer of personal data to any other controller
    - a. If you wish that we transfer personal data and provide them to any other controller or, as appropriate, any other company, then the controller is obliged to transfer the personal data, which the controller would process under a contract concluded or, as appropriate, with the consent and by automated means, in an appropriate format, to a designated entity, provided that there are no legal or other significant impediments to this.
  - g) The right to object to the processing of personal data
    - a. If the data subject discovers or believes that the controller is processing personal data in violation of the protection of private and personal life or in conflict with the law (provided that the personal data are processed on the basis of a public or legitimate interest, or processed for the purposes of direct marketing, including profiling, or for statistical purposes or for the purposes of scientific or historical significance), he/she may contact the controller and ask for an explanation or remedy of the defective condition. An objection may also be raised directly to the automated decision-making and profiling.
2. You can exercise individual rights by sending a request to [info@tanecprovsechny.cz](mailto:info@tanecprovsechny.cz) or in writing to the following postal address: Plavínová 2783/20, Prague 3, 130 00.
  3. Requirements to rights according to paragraph 1 of this Article, subparagraphs c) and d) cannot be fully satisfied in some cases for the purposes referred to in Article III of this Policy, with the exception of subparagraph (c) when it is possible to exercise all the rights referred to in paragraph 1.
  4. In the event that the data subject believes that Tanec pro všechny is processing his/her personal data in violation of the protection of his/her private and personal life or in conflict with the applicable legislation, in particular if the personal data are inaccurate with regards to the purpose of their processing, he/she may:
    - a. Ask Tanec pro všechny for an explanation by email sent to [info@tanecprovsechny.cz](mailto:info@tanecprovsechny.cz),

- b. Object to the processing and request by e-mail sent to [info@tanecprovsechny.cz](mailto:info@tanecprovsechny.cz) that Tanec ensures the remedy of such condition (e.g. by blocking, rectifying, supplementing or destroying the personal data). Tanec pro všechny will immediately decide on the objection and inform the data subject. If Tanec pro všechny does not satisfy the objection, the data subject has the right to contact the Office for Personal Data Protection directly. This provision is without prejudice to the right to contact the Office for Personal Data Protection directly with one's suggestion.
5. We will endeavour to respond to you and provide information on the measures taken as soon as possible, however within one month at the latest. If necessary and in particular with regard to the number of requests or complexity, we are entitled to extend the deadline by another two months. We will inform you about any extension as well as its reasons.
6. If the data subject exercises any of the above rights, Tanec pro všechny has the right to request the proof of identity of the data subject. We recommend sending requests from the subject's email address that was previously communicated to Tanec pro všechny. If the request is submitted in any other form, i.e. from a different email address, Tanec pro všechny has the right to request additional verification in the form of a reply to a verification email. If the applicant fails to prove his/her identity within 14 days of receiving the verification e-mail, his/her request for the exercise of rights might not be accepted.
7. In the event of a repeated and unjustified request for the provision of a physical copy of the processed personal data the controller is entitled to charge a reasonable fee for the related administrative costs.

## **X. Final Provisions**

1. All legal relations arising in connection with the processing of personal data will be governed by the laws of the Czech Republic, regardless of where the access to them was made. The Czech courts will have the jurisdiction to resolve any disputes arising in connection with the protection of privacy between the data subject and the controller.
2. The data subject may file a complaint with a supervisory authority, which is the Office for Personal Data Protection ([www.uoou.cz](http://www.uoou.cz)).
3. This Policy takes effect on 7 August 2019.