

Memorandum on the processing of personal data in connection with requests from data subjects (hereinafter referred to as the “Memorandum”) Introduction

Dear Sir or Madam,

by means of this memorandum, we would like to inform you, as data subjects (applicants), of the principles and procedures governing the processing of your personal data and of your rights in relation to the processing of such data, in accordance with Regulation (EU) (EU) 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/EC (General Data Protection Regulation; hereinafter referred to as the “GDPR”) and Act No. 110/2019 Coll., on the processing of personal data, as amended (hereinafter referred to as the “ZZOÚ”).

EP Kids, z.s. is committed to the transparent and fair processing of your personal data and to ensuring its proper protection in accordance with applicable legislation, so as to guarantee fair and equitable processing. We protect your personal data with the highest level of security to prevent any unauthorised or accidental access to your personal data, destruction, loss, unauthorised transfers or unauthorised processing. To this end, we implement appropriate technical and organisational measures to ensure a level of security commensurate with all possible risks. Persons who come into contact with personal data are obliged to maintain confidentiality regarding information obtained in connection with the processing of such data.

Given that this memorandum refers to terms relating to data protection and also uses abbreviations, we have included an explanation of the terms and abbreviations used in the section entitled ‘List of selected terms and abbreviations’ in this memorandum, in order to present the content of this text to you in an even clearer form. Through this memorandum, the controller explains what personal data it processes about you in connection with the exercise of your rights as a data subject.

Data Controller

The controller of your personal data is the association EP Kids, z.s., ID No. 27018997, with its registered office at Pařížská 130/26, Josefov, 110 00 Prague 1, registered in the Register of Associations under ref. no. L 16293/MSPH, which is responsible for fulfilling the obligations under the applicable legislation on the protection of personal data (hereinafter referred to as the “controller”).

List of selected terms and abbreviations

TERM AND ABBREVIATION	MEANING
Personal data	Any information about an identified or identifiable natural person; an identifiable natural person is a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
Special categories of data	Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, and data concerning a natural person’s health or sex life or sexual orientation.
Data subject	A natural person to whom personal data relates. A data subject is considered to be identified, or identifiable if their identity can be ascertained, directly or indirectly, on the basis of one or more pieces of personal data.
Controller	A natural or legal person, public authority, agency or other body which, alone or jointly with others determines the purposes and means of the processing of personal data.
Processing	Any operation or set of operations which is performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise other form of disclosure, alignment or combination, restriction, erasure or destruction.
Purpose of processing	The purpose of the controller’s activities and their rationale
Means of processing	The tools and procedures used for the specific processing of personal data.
Legal basis	Legal basis, or legal grounds, is a condition without which the processing of personal data under any circumstances.
Data processor	A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Recipient	A natural or legal person, public authority, agency or other body to whom personal data is disclosed, whether to a third party or not. The recipient has a legal, contractual or other authority to process personal data. These include other controllers or processors, such as tax, administrative or regulatory authorities. However, public authorities which may receive personal data in the course of a specific inquiry in accordance with the law of a Member State are not considered recipients; the processing of such personal data by these public authorities must comply with the applicable data protection rules for the purposes of the processing.
Third party	A natural or legal person, public authority, agency or other body which is not a data subject, a controller, a processor or a person directly under the authority of the controller or the data processor, which is authorised to process personal data.
ÚOOÚ	The supervisory authority under the ZZOÚ is the Office for Personal Data Protection. It is entrusted with the powers of a central administrative authority in the field of personal data protection to the extent specified by the Personal Data Protection Act and other powers specified by a special legal regulation.
Cookies	Small text files that allow a website to remember important information that will make it easier for the user to use the site in the future. The controller informs you about the use of cookies. Further information can be found on the controller's website.

Personal data processed

The controller and the processor, who processes personal data on behalf of the controller, process the following personal data in particular, in accordance with the relevant legal basis or legal title and the purpose of the processing: first name, surname, address, telephone number, email address, handwritten signature, electronic signature, and the subject of the submitted application.

The provision of personal data is a legal requirement. If the personal data necessary to verify the applicant's identity is not provided, it will not be possible to assess or process the applicant's request. The applicant is obliged to provide only accurate and up-to-date personal data.

Source of the personal data being processed The Controller obtains your personal data primarily

from you. **Purpose, duration and legal basis for the processing of personal data**

Purpose of processing	Legal basis	Processing period ¹
The controller processes personal data for the purpose of handling requests from data subjects in connection with the exercise of their rights	Compliance with a legal obligation pursuant to Article 6(1)(c) of the GDPR	For a period of 5 years from the date the request is processed

Method and means of processing

The controller and the processor, who processes personal data on behalf of the controller, process your personal data both manually (for example, by filing a paper-based request in the relevant file) and automatically (using ICT tools, such as a personal computer running Microsoft Office 365 and the controller's or processor's system).

In the case of automated processing of your personal data, the controller does not use automated decision-making, including profiling, which could affect your rights.

Recipients of personal data

Under certain circumstances, the controller may transfer your personal data to so-called recipients (other controllers, processors) and third parties.

Personal data may be disclosed to the following recipients: the controller's suppliers, in particular for the purpose of providing legal services, administrative support, telecommunications and technical services for the purpose of supporting, managing and developing the information system, and conducting external audits. In addition, personal data may be disclosed to public authorities in accordance with specific regulations.

¹ When determining the appropriateness of the period for which personal data is processed, the following factors will be taken into account in particular: (i) the length of the limitation period, (ii) the likelihood of legal claims being brought, (iii) the likelihood and significance of potential risks, and (iv) any recommendations from supervisory authorities

However, the recipient is not considered to be a third party if public authorities request personal data as part of a specific investigation; in such a case, they are considered a so-called third party.

Transfer of personal data to third countries

The controller, or a processor acting on behalf of the controller, processes your personal data primarily within the Czech Republic, or within the European Union (hereinafter referred to as the "EU"), where uniform protection of personal data is guaranteed in every Member State. In very exceptional cases, your personal data may be processed outside the EU, for example in a computer system whose servers are located outside the EU. In such a case, we would select as a contractual partner a company that meets the conditions for secure data transfer in accordance with applicable legislation. We will inform you in an appropriate manner of the specific measures and procedures, to whom and to which countries personal data is disclosed/transferred, under what conditions, how your data is protected, and any associated risks.

Rights of the data subject

- Where the processing of personal data is based on your consent, you have the right to withdraw your consent at any time. In connection with the withdrawal of consent, the controller informs you that the withdrawal of consent does not affect the lawfulness of the processing of personal data prior to its withdrawal, nor does it affect the processing of data on other legal grounds for which your consent is not required.
- You have the right to request access to your personal data and more detailed information about its processing.
- You have the right to request the rectification of your inaccurate or incomplete personal data.
- You have the right to request that your personal data be provided in a commonly used and machine-readable format, enabling it to be transferred to another controller, provided that we have obtained it on the basis of your consent or in connection with the conclusion and performance of a contract, and it is processed by automated means.
- You have the right to object to the processing of some or all of your personal data.
- You have the right to ask us to erase your personal data if we no longer have any legal basis for further processing.
- You have the right to lodge a complaint with the Office for Personal Data Protection.
- You have the right not to be subject to automated individual decision-making, including profiling.

Any updates to the memorandum

Given that the rules and conditions governing the processing and protection of your personal data may change, particularly as a result of changes in legislation, or that our terms and conditions, procedures and methods for processing and protecting your personal data may change, we will inform you of such changes by updating this memorandum, unless the nature of the change requires us to contact you directly.

This memorandum was last updated on 1 December 2023.

Exercise of data subject rights

Where your request concerns the exercise of your rights as set out in the section entitled '**Rights of the data subject**' in this memorandum, the controller is always obliged to deal with such a request from the data subject and must provide the information without undue delay upon receipt of the request, and in any event within one month of receiving the request. In exceptional cases, this period may be extended by two months, in which case the data controller must inform the data subject of this, including the reasons for such an extension.

You may send your request to the controller's contact details:
Postal address: EP Kids, z.s., Pařížská 130/26, Josefov, 110 00 Prague 1 or email
milena.segecova@epholding.cz

Alternatively, you may contact us by telephone on: +420 703 401 493.

To make it easier to exercise your rights, you may use the sample form marked 'Data Subject Request'.

If you have reasonable grounds to suspect that there has been a breach of the law regarding the protection of personal data, you have the right to lodge a complaint with the Office for Personal Data Protection, Pplk. Sochora 727/27, 170 00 Prague 7-Holešovice, email: stiznosti@uoou.cz ; for this purpose, you may use the form available on the website of the Office for Personal Data Protection <https://uoou.gov.cz/verejnost/stiznost-na-spravce-nebo-zpracovatele>.