

Memorandum on the processing of personal data for users of social media add-ons and tools (hereinafter referred to as "the memorandum")

Introduction

Dear Sir or Madam,

this memorandum is intended to inform you 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.

Social media plugins

The controller informs you about the use of social media plugins on the controller's website. When you visit the website, your browser establishes a direct connection with the relevant social media server from which the button is loaded. In this case, the social media provider will detect that the relevant page on the website has been visited. If you wish to prevent this, please log out of your social media accounts before visiting our website. Please also note that social media providers set cookies unless you have disabled the acceptance and storage of cookies in your browser settings. We have provided instructions on how to change the settings for the most commonly used web browsers. Simply click on the relevant browser:

- Chrome
- Firefox
- Internet Explorer
- Opera
- Safari iOS

Individual extensions used

Instagram	Information on data protection can be found on the Meta Platforms website;
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Cookies

As the controller's website uses cookies to enable the basic functioning of the website, as well as for marketing, personalisation and analysis, we would like to inform you that you can manage cookies on **the controller's website**. Depending on the scope of the consent you have given, we may share information about how you use our website with our social media and analytics partners. These partners may combine this data with other data you provide to them, for example by using their services. Further information on the cookies used can be found on the controller's website.

Data subjects

These are website visitors and users of social media plugins and tools.

Personal data processed

The controller and the processor, who processes personal data on behalf of the controller, process, in accordance with the relevant legal basis or legal title and the purpose of the processing, in particular the following categories of personal data:

- identification, authentication and address data: first name, surname, nickname;
- electronic data: IP address, pixel ID, device type, its unique identification number, browser type, operating system;
- other personal data voluntarily provided by the data subject.

Source of the personal data processed

The Controller obtains your personal data from

you. **Purpose and legal basis for the processing**

of personal data

The controller processes your personal data primarily for the purposes set out below, on the basis of the relevant legal basis.

Purpose	• providing information about the controller's events; • creating records and downloading their content; • for which website visitors and contributors provide their personal data; • in relation to the cookies specified on the controller's website
Legal basis	• legitimate interest • consent of the website visitor; • in relation to cookies defined on the controller's website

The consent you have given will be retained for the entire period during which your consent is granted to the controller and for a further period of 5 years following its withdrawal, for the purpose of demonstrating that the processing of personal data by the controller was lawful. The legal basis for such processing is legitimate interest pursuant to Article 6(1)(f) of the General Data Protection Regulation.

Methods and means of processing

The controller and the processor, who processes personal data on behalf of the controller, process your personal data by automated means. 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.

Processor

The controller processes your personal data through its employees who need access to personal data to perform their work duties and who are bound by a duty of confidentiality regarding all facts and data they become aware of in the course of their work. Furthermore, the processor's employees have access to your personal data, but only to the extent necessary for the performance of their activities on behalf of the controller. We always enter into a written personal data processing agreement with all our processors, which includes safeguards for the security of your personal data.

Categories of processors	Activities
IT service provider and software supplier	Provision of IT services and software, including technical support, administration, development, maintenance of the relevant system and the processing of security risk analyses

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>.

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.
Data subject	A natural person to whom personal data relate. A data subject is considered to be identified, or identifiable if his or her 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 forms of disclosure, sorting or combining, restriction, erasure or destruction.
Purpose of processing	The objective and purpose of the controller's activities
Means of processing	Tools and procedures selected for the specific processing of personal data.

Legal basis	The legal basis, or legal ground, 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.
ÚOOÚ	The supervisory authority under the Personal Data Protection Act is the Office for Personal Data Protection. It is entrusted with the powers of the central administrative authority for personal data protection within the scope set out in the Personal Data Protection Act, and other powers specified by specific legislation.
COOKIES	Small text files that enable a website to remember important information, making it easier for the user to use the site in future. The controller informs you about the use of cookies. Further information can be found on the controller's website.