

## Privacy Policy

We are very pleased with your interest in the POP family group, which includes the POP Airport shopping centre, Dinosauria Museum Prague, and Majaland amusement park. As the protection of your personal data is very important to us, we would like to ask you to read the privacy policy below, which describes how we collect personal data, what we do with it, for what purpose, on what legal basis, and what rights you have in relation to the processing of your personal data.

When processing your personal data, we are governed by the legal provisions, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council 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 Sb. on the processing of personal data.

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#### 1. WHO TAKES CARE OF YOUR DATA

**POP Airport s.r.o.**, Comp. Reg. No. (IČO): 062 63 615, with registered office at Ke Kopanině 421, 252 67 Tuchoměřice, registered in the Commercial Register maintained by the Municipal Court in Prague under File No. C 279065, is the joint controller of your personal data together with **POP Entertainment Services s.r.o.**, Comp. Reg. No. (IČO): 064 94 536, with registered office at Opletalova 1015/55, Nové Město, 110 00 Prague 1, registered in the Commercial Register kept by the Municipal Court in Prague under File No. C 283069, **Paleoinvest s.r.o.**, Comp. Reg. No. (IČO): 086 28 424, with registered office at Opletalova 1015/55, Nové Město, 110 00 Prague 1, registered in the Commercial Register kept by the Municipal Court in Prague under File No. C 2322273, **POP retail s.r.o.**, Comp. Reg. No. (IČO): 107 25 008, with registered office at Opletalova 1015/55, Nové Město, 110 00 Prague 1, registered in the Commercial Register kept by the Municipal Court in Prague under File No. C 347304, and **Majaland Praha s.r.o.**, Comp. Reg. No. (IČO): 039 39 898, with registered office at Opletalova 1015/55, Nové Město, 110 00 Praha 1, registered in the Commercial Register maintained by the Municipal Court in Prague under File No. C 239579, within the **POP family** group (hereinafter referred to as the "**Joint Controllers**" or individually as the "**Joint Controller**").

The Joint Controllers process your personal data in accordance with the applicable data protection legislation, in particular, Regulation (EU) 2016/679 of the European Parliament and of the Council 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 Sb., on the processing of personal data, in accordance with the terms and conditions set out in this Privacy Policy.

## 2. WHAT HAPPENS TO YOUR DATA

### a. What personal data we process

The Joint Controllers process, in particular, the following personal data:

- your first name, surname, e-mail address, date of birth, telephone number, home address, and other personal data that you provide to us and for the processing of which you have given us your consent (e.g. for subscribing to the Pop family club, for receiving the newsletter, for using the wi-fi network in the POP Airport shopping centre, Dinosauria Museum Prague, and Majaland amusement park (hereinafter referred to as the "**POP Family Establishments**"));
- telephone number, billing data (street and No., city, postal code) or delivery data (street and No., city, postal code), username if the customer is registered in the online shop of the Joint Controller and the Comp. Reg. No. (IČO), VAT number and the registered office address (street and No., city, postal code) in the case of a natural person entrepreneur. And also data on customer behaviour in connection with electronic access to the online shop and data on the services/goods purchased (type, volume, specifications, and price of goods) and the customer's payment behaviour. This also applies similarly when ordering tickets for POP Family Establishments.
- visual images of individuals recorded by the CCTV system in connection with the security of access and movement within the POP Family Establishments;
- visual images of natural persons, recorded in the form of photographic material and/or audiovisual recordings for scientific (especially documentary), artistic, news, or reportage purposes.

When you visit our website, we store certain information about the browser and operating system you are using, the date and time of your visit, the status of your access (e.g. whether you were able to access the website or received an error message), your use of the website features, search terms you may have entered, the website from which you came to our website and the website you go to from our website. Our website also uses cookies (see below for more information on the use of cookies). In addition, for security reasons, in particular, to prevent and detect attacks against our website or fraud attempts, we store your IP address and the name of your internet service provider for seven days.

When you visit any of the POP Family Establishments, your personal data obtained from the operation of the internal and external CCTV monitoring systems will be processed for the purpose of prevention, clarification of possible illegal activities, and ensuring the security of the POP Family Establishments.

In the case of any online purchase and booking of tickets to any of the POP Family Establishments via the Ticketportal sales network, the Joint Controller obtains personal data after you provide it to IRSnet CZ s.r.o., Comp.Reg.No. (IČO): 267 32 122 (in particular by filling in the purchase/booking form) for the purpose of purchasing or booking a ticket. In this case, IRSnet CZ s.r.o. is the processor of your personal data within the meaning of Article 28 of the GDPR, which has contractually agreed to ensure the protection of your personal data.

In the case of any online purchase and booking of tickets to any of the POP Family Establishments via the system known under the trade name reenio, the Joint Controller obtains personal data after you provide it to the operator of the reenio service, GARVIS Solutions s.r.o., Comp.Reg.No. (IČO): 286 59 058 (in particular by filling in the purchase/booking form) for the purpose of purchasing or booking a ticket. In this case, GARVIS Solutions s.r.o. is the processor of your personal data within the meaning of Article 28 of the GDPR, which has contractually agreed to ensure the protection of your personal data.

When you visit one of our POP Family Establishments, your image may be recorded for news or reportage purposes.

We further process your personal data only if you provide it to us, e.g. as part of any registration or booking (e.g. for the purpose of providing wi-fi services), contact form, survey, competition for prizes, etc. You may also give us your consent when you complete an order for goods from the online shop of one of the POP Family Establishments or when ordering or booking tickets for one of the POP Family Establishments.

In order to provide you with a connection to the wi-fi network, your personal data are necessary for us in connection with the registration for the wi-fi network.

**b. Why and based on what authorization we process personal data.**

We process your personal data for the following reasons:

- Performance of the contract and provision of services - in particular, in the performance of the contract in connection with the sale of tickets to one of the POP Family Establishments and the purchase contract for the sale of goods via the online shop of one of the POP Family Establishments. If you do not provide your personal data, the respective contract related to the booking and sale of tickets and/or the purchase contract cannot be concluded. The Joint Controller also processes your personal data for the purposes of the legitimate interest of the Joint Controller within the meaning of Article 6(1)(f) of the GDPR, namely (a) to evaluate the customer's behaviour when using the services of the Joint Controller in connection with electronic access to the online shop and to improve customer service in the context of website personalization (IP address and derived location, use of cookies and other technologies, etc.) in order to maintain internal statistics and reports, (b) to evaluate the customer's payment behaviour for the purpose of preventing the creation of debts and deciding on the conditions for concluding further contracts with the customer, as well as for the purpose of registering debtors, (c) to assert legal claims of the Joint Controller. You have the right to object to such processing in accordance with Article 21 of the GDPR.
- Marketing activities - we send you e-mail commercial communications based on your consent, which you gave us when you registered for the newsletter or subscribed to the Pop Family Club. If you no longer wish to receive our marketing communications, you can easily unsubscribe using <https://www.pop.cz/cs/odhlaseni-newsleteru>.
- Improving our services - it is our goal for you to leave with the most positive experience from every visit you make to our POP Family Establishments or website. To achieve this, we use website personalisation to offer you the most relevant offers of our Business Centre. Based on our legitimate interest in this respect, we process personal data in an automated manner and by using cookies.
- Customer care - if you contact us with any query, complaint, or suggestion we will undoubtedly deal with such an issue with the utmost care. To be able to provide you with a relevant response, we will need to process your personal data to the extent necessary. For this purpose, we only store your basic identification data to be able to contact you back.
- Fulfilment of the legal obligations of the Joint Controller within the meaning of Article 6 (1) (c) of the GDPR, in particular for the fulfilment of statutory tax and accounting obligations, as well as obligations related to consumer protection obligations and those arising from Act No. 89/2012 Sb. of the Civil Code.

- Protection of property and health - it is our legitimate interest to provide you with maximum security and safety during your visit to any of the POP Family Establishments. For this reason, all POP Family Establishments, including parking lots and garages, operate an indoor and outdoor CCTV monitoring system, including the recording of persons and vehicles entering or leaving the POP AIRPORT Shopping Centre premises (hereinafter referred to as the "**CCTV System**"). The CCTV System is operated for both prevention and clarification of possible illegal activity. In addition, the CCTV System is used to deal with initiatives and requests for access to documentation relating to the safety of the operation of the individual POP Family Establishments by the public authorities authorised to do so under the relevant legislation. The operator of the CCTV system within the POP AIRPORT shopping centre is the company POP Airport s.r.o.; within the Dinosauria Museum Prague it is Paleoinvest s.r.o.; within the Majaland amusement park it is Majaland Praha s.r.o.; and their operation is provided by DRAGONES AGENCY s.r.o., Com. Reg. No. (IČO): 04640799, with registered office at Panská 1480/10, Nové Město, 110 00 Prague 1. We always inform you of the marking and location of the CCTV systems by means of information signs and pictograms when you enter such an area that is monitored, always indicating the specific company as the controller.
- Legitimate interest - it is our legitimate interest to process your personal data for the purpose of documenting and presenting records of publicly accessible events, but not for commercial purposes.

### **c. For how long we process your personal data**

We process and store all your personal data for the period absolutely necessary.

Personal data is processed to the extent necessary for the fulfilment of activities in accordance with the purpose of the processing and for the period necessary to achieve the purpose of the processing of such personal data or for the period of time directly provided for by law, taking into account contractual or statutory time limits for the exercise of rights to claim for defects/damages or warranty periods. Afterwards, the personal data is deleted or anonymised.

For the purposes of the performance of the contract, your personal data are processed for the entire duration of such a contract and for the duration of the period for exercising rights under liability for defects or damage or under warranty periods. For the purposes of compliance with legal obligations, your personal data is processed for at least the duration of such contract and for the period required by specific legal provisions, generally for a maximum period of ten (10) years.

Within the legitimate interest of the Joint Controller, personal data is processed for as long as such legitimate interest of the Joint Controller lasts. In order to protect legal claims and for internal records and checks (payment behaviour, etc.), the data is processed for the duration of the general limitation period of three (3) years. In the event that judicial, administrative, or other proceedings are initiated, the relevant personal data is processed to the extent necessary for the duration of such proceedings. Personal data processed for evaluating customer behaviour is processed for a maximum period of three (3) years.

Personal data that you have provided us with your consent will be processed for a period of five (5) years from the date of such consent or until such consent is withdrawn. If your consent was given in connection with your joining the POP Family Club, the personal data will be processed for the duration of your membership in the POP Family Club. Any withdrawal of your consent shall be without prejudice to the lawfulness of the processing (i) for the fulfilment of a legal obligation to which the Joint Controller is subject, (ii) if the processing is necessary for the protection of the vital interests of the data subject or of another natural person, (iii) if the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in

the Joint Controller, (iv) if the processing is necessary for the purposes of the legitimate interests of the relevant Joint Controller or third party. You can withdraw your consent using <https://www.pop.cz/cs/odhlaseni-newsleteru>.

The personal data obtained through the CCTV system is stored for the period of time strictly necessary but no longer than fourteen (14) days with regard to the purpose pursued (e.g. to detect and investigate possible theft and other unlawful acts). In exceptional cases (in particular when cooperating with law enforcement authorities), CCTV recordings (including the personal data contained therein) may be kept for a longer period of time. Your personal data will be securely deleted when it is no longer needed for the purposes for which it is collected. Further information regarding CCTV is set out in the personal data processing information available at each of the POP Family Establishments.

#### **d. Security of your personal data**

We assure you that all your personal data is kept secure with us.

As we care deeply about the security of your personal data, we regularly check the security of your personal data and continuously improve this security. Access to your personal data is protected by passwords and other software security features that are only available to authorized persons.

#### **e. How your personal data is processed**

Your personal data may be processed manually or by automated means, either by our authorised employees or by an external supplier. In any case, your personal data is stored in secure databases, and all processing, as well as the transfer of personal data, will be carried out with full respect for your privacy and in accordance with applicable law.

#### **f. Delimitation of the share of responsibilities of the individual Joint Controllers**

The Joint Controllers have entered into a mutual agreement in accordance with Article 26 of the GDPR, based on which they have delimited their responsibilities for compliance with their obligations under the GDPR among themselves.

POP Entertainment Services s.r.o. fulfils the following obligations on behalf of the Joint Controllers:

- communicates with the supervisory authority;
- informs data subjects of their rights concerning in particular:
  - the identity and contact details of the specific Joint Controller;
  - the purpose of the processing;
  - the legitimate interests of the Joint Controller where the processing of personal data is necessary for the purposes of the legitimate interests of the Joint Controller or of a third party;
  - the existence of the right to lodge a complaint with a supervisory authority;
  - the period for which the personal data will be stored;
  - the existence of the right to withdraw consent to the processing of personal data at any time;
  - whether the provision of the personal data is a legal or contractual requirement, whether the data subject is under an obligation to provide the personal data, and the consequences of not providing the personal data;
  - whether automated decision-making, including profiling, takes place.
- concludes contracts with individual processors.

The individual Joint Controllers (the controller with which the data subject has entered into a contractual relationship) fulfils the following obligations:

- inform the data subject of her rights concerning, in particular:
  - the existence of the right to request from the Joint Controller access to personal data relating to the data subjects;
  - the right to rectification;
  - the right to erasure;
  - the right to restriction of processing;
  - the right to object

The Joint Controllers hereby inform the data subject that the data subject is entitled to exercise the rights under the GDPR with and against each of the Joint Controllers.

### **3. YOUR RIGHTS**

In connection with the protection of your personal data, you have the following rights, which include in particular the right to withdraw your consent to the processing of your personal data at any time, the right to access your personal data, the right to rectify/complete your personal data, the right to request the restriction of the processing of your personal data and the right to the erasure of your personal data. You also have the right to raise an objection, lodge a complaint against the processing of your personal data, the right to transfer your personal data, and the right to be informed of a breach of security of your personal data.

To exercise any of your rights, you may contact the Joint Controllers in the manner set out below:

- electronically at the e-mail address: [info@pop-group.cz](mailto:info@pop-group.cz)
- by phone at: +420 702 222 433; or
- in writing to: POP Airport, Ke Kopanině 421, 252 67, Tuhoměřice

If you communicate with the Joint Controllers electronically, the information will be provided to you in a commonly used electronic form (however, you may request a different method of providing the information). The Joint Controllers will inform you of the action taken on your request or initiative within one (1) month of receipt of the request, but no later than three (3) months of receipt of the request, unless the time limit has been extended where justified.

#### **The right to withdraw your consent to the processing of your personal data**

You have the right to withdraw your consent to the processing of your personal data at any time. However, the withdrawal of your consent is without prejudice to the lawfulness of the processing based on the consent given prior to the withdrawal. The withdrawal of your consent also does not necessarily oblige the Joint Controller to destroy your personal data. Since your consent was given for a specific purpose, your withdrawal of the consent will oblige the Joint Controller to stop processing your personal data for that specific purpose, which you have previously approved. Your personal data may therefore continue to be processed for the purpose for which you did not withdraw your consent or based on other legal grounds.

#### **Right of access to your personal data**

You have the right to obtain information (confirmation) from the Joint Controller as to whether or not your personal data is being processed. If the Joint Controller processes the personal data of the data subject, you have the right to obtain your personal data and you also have the right to the following information:

- the purpose of the processing;
- the categories of personal data processed;
- the recipients or categories of recipients to whom your personal data have been or will be disclosed;;
- the period for which your personal data will be stored;
- whether automated decision-making, including profiling, takes place;
- your other rights related to the protection of personal data;

Upon your request, the Joint Controller is obliged to provide you with a copy of the personal data processed free of charge. If you request further copies, the Joint Controller may charge you a reasonable fee which corresponds to the administrative costs of making such copies.

### **The right to rectification or completion of your personal data**

If you suspect that the Joint Controller is processing your personal data that is inaccurate, you have the right to have it corrected or completed. In this case, you only need to notify the Joint Controller and have your personal data completed and corrected.

### **The right to restriction of processing of personal data**

You have the right to the restriction of the processing of your personal data in any of the following cases:

- you dispute the accuracy of the personal data; in this case, the processing will be limited to the time necessary for the Joint Controller to verify the accuracy of your personal data;
- the processing of the personal data is unlawful, and you request a restriction on the use of the personal data instead of its erasure;
- the Joint Controller no longer needs the personal data for the stated purpose of the processing, but you need it to establish, exercise, or defend legal claims;
- you object to the processing of personal data; in this case, the processing will be restricted until it is verified that the legitimate grounds of the Joint Controller prevail over your legitimate grounds

### **The right to erasure of your personal data (the right to be forgotten)**

At your request, the Joint Controller will erase your personal data without undue delay if any of the following reasons apply:

- your personal data is no longer needed for the purposes for which it was collected or otherwise processed;
- you withdraw the consent based on which your personal data was processed and there is no further legal basis for processing it;
- you object to processing and there are no prevailing legitimate grounds for processing, or you object to the processing of personal data for direct marketing purposes;
- your personal data is processed unlawfully;

- your personal data must be erased to comply with a legal obligation under European Union or Member State law to which the Joint Controller is subject;
- the personal data was collected in connection with the offer of information society services pursuant to Article 8(1) of the GDPR.

### **The right to object**

In the case of processing personal data based on the legal title of the legitimate interest of the Joint Controller (e.g. direct marketing), you have the right to object to the processing of your personal data on the grounds you describe in the objection. If the objection is accepted, the Joint Controller will stop processing the personal data (retaining only the stored data) and will assess whether the Joint Controller has substantial legitimate grounds for the processing which prevail over your interests or rights and freedoms or for the establishment, exercise or defence of legal claims. If the Joint Controller concludes that it has such grounds, it will inform you and at the same time notify you of the other possibilities of defence and continue processing the personal data. If, on the contrary, the Joint Controller concludes that it does not have sufficient grounds for processing the personal data, the Joint Controller will inform you, terminate the processing, and erase your personal data.

### **The right to lodge a complaint against the processing of your personal data**

Should you suspect that your personal data is being processed unlawfully, you also have the right to lodge a complaint with the Personal Data Protection Authority, as follows:

- electronically by sending an e-mail to [posta@uouu.cz](mailto:posta@uouu.cz);
- through data box ID: qkbaa2n;
- by phone at +420 234 665 111; or
- in writing by sending a letter to Pplk. Sochora 27, 170 00 Praha 7

or possibly with another competent supervisory authority in connection with the processing of personal data. However, if you do not wish to contact the supervisory authority immediately, it is sufficient to contact the Joint Controller and the Joint Controller will resolve any discrepancies in the processing of your personal data to your satisfaction.

### **The right to transfer your personal data**

Thanks to the right to data transferability, you have the possibility, under the conditions set out below, to obtain from the Joint Controller the personal data provided by you in a structured, commonly used, and machine-readable format and the right to transfer this data to another controller. You also have the right to request the Joint Controller to transmit your personal data in a structured, commonly used, and machine-readable format to another controller if technically feasible. Conditions for exercising the right to transfer your personal data:

- it concerns the processing of your personal data based on your consent or based on a contract,
- the processing of your personal data is automated.

## 4. SHARING YOUR DATA

### Transfer of your personal data to third parties

The Joint Controller is entitled, under the conditions set out in applicable law, to transfer your personal data for further processing to persons (recipients) who process personal data solely for the purpose of carrying out the activity for which such recipient has been authorised by the Joint Controller and mainly based on a contract for the processing of personal data, and/or for the purpose of fulfilling the legal or contractual obligations of the Joint Controller and/or based on your consent to the processing of personal data granted to the Joint Controller and/or based on the legitimate interest of the Joint Controller.

Such recipients include in particular:

- suppliers involved in the execution of payments;
- suppliers providing operation and administration of the ticketing system for the POP Family Establishments;
- suppliers providing online shop operation and other technical support services;
- carriers and dispensing points for the delivery of goods;
- providers of online store evaluation services;
- providers of professional services (tax advisors, attorneys) for the purpose of fulfilling the legal tax and accounting obligations and legal claims of the Joint Controllers;
- public authorities and public administration bodies or bodies entrusted by public authorities to the extent and for the purposes provided for by law;
- advertising and social networks (based on your consent), i.a.:
  - a. Facebook;
  - b. Instagram

belonging among the products of Facebook Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, D02 X525, Ireland; the privacy policy of this company is available here: <https://cs-cz.facebook.com/about/privacy> and here: <https://cs-cz.facebook.com/help/instagram/519522125107875>, where the processor is HubSpot, Inc., 25 First Street, 2nd Floor, Cambridge, MA 02141, USA; the privacy policy of this company is available here: <https://legal.hubspot.com/privacy-policy>

The recipients are bound by a duty of confidentiality regarding your personal data, which may not be used for any purpose other than the purpose stated above, and they are also obliged to protect your personal data from misuse.

The Joint Controllers do not transfer personal data to countries outside the European Economic Area or to any international organisation.

## **5. COOKIES**

### **What are cookies and what are they used for?**

Cookies are small data files stored on your device by the website you visit. Cookies are essential to make the website easier and more efficient to use. They allow remembering your safe browsing settings, ad settings, or the user language so that you don't have to re-enter these details. In addition, cookies help to track the number of visitors to the website, whether there was a proper connection between your device and the website, and allow tailoring the content of the website to suit your interests, thus helping to improve the overall user experience of the website.

Cookies are important from a privacy perspective. Cookies do not allow disclosing your identity but are used to store general information about your behaviour and preferences on the websites you visit.

Cookies may be analysed by analytical tools, in particular Google Analytics.

### **Do I have to give consent to use cookies?**

Most web browsers automatically accept cookies by default. By using these websites, you consent to the storage and use of cookies.

If you do not wish to use cookies, you can restrict or block their use directly in your web browser settings. The use of cookies, as well as their restriction, blocking, or deletion, is linked to the device used and also individually to each browser used.

If you decide to restrict the use of cookies in any way, all functions of our website may not be available, or individual website functions may be available to a limited extent.

## **6. EFFECTIVENESS OF THE PRIVACY POLICY AND ITS UPDATES**

This Privacy Policy is elaborated as of 4 December 2024, and the Joint Controllers reserve the right to update it from time to time, with any changes becoming effective on the date the current version of the relevant document is posted on the Joint Controllers' website.

The GDPR is drawn up in English and in Czech language. In case of any dispute the Czech language version shall prevail.