

**Principles of Personal Data Processing Eden Arena, a.s.**

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## I. Introduction and definitions

Eden Arena, a.s. with its registered office at U Slavie 1540/2a, 100 00 Prague 10, Id number: 294 13 001, registered in the Commercial Register administered by the Municipal court in Prague under file No. B 18885 (hereinafter referred to as “**Arena**”) as the administrator of personal data puts emphasis on the fulfilment of all regulatory measures, regardless if they are on the national or international level, and because of this improvement in the quality of the protection and security of personal data, Arena has issued this document, which serves as the principles of personal data processing at Arena for the purposes of notifying the public and also informs affected personal data subjects about the principles, which as an administrator of personal data pursuant to regulation (EU) 2016/679 of the European Parliament and of the Council of 27<sup>th</sup> of April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as “**GDPR**”), observes during the processing of personal data of natural persons, which occurs in the scope of operations of Arena (hereinafter referred to as “**Principles**”).

Terms that are not expressly defined in these Principles have the meaning resulting from GDPR.

## II. Lawfulness of personal data processing

Among the basic principles of personal data processing according to GDPR are lawfulness, transparency, fairness, keeping data up to date, storing it no longer than it is necessary for the purposes for which the personal data are being processed, and naturally sufficient measures to ensure its security.

For the fulfilment of these principles, Arena adheres to the below-mentioned rules:

- a) For the fulfillment of lawfulness:
  - The administrator of personal data processes data only if (at least one of the following applies)
    - processing is necessary for compliance with a legal obligation to which the administrator is subject;
    - processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract;
    - processing is necessary in order to protect the vital interests of the administrator or of another natural person;
    - processing is necessary for the establishment, exercise or defense of legal claims concerning processing of special categories of personal data;
    - the data subject has given consent to the processing of his or her personal data.
  - In case that it is discovered that personal data have been processed without any of the above-mentioned conditions, the administrator without any undue delay will stop processing these personal data.
- b) For the fulfillment of the obligation, the administrator only processes adequate, relevant and restricted data that are necessary for achieving a particular purpose resulting in the minimization of the personal data processed.
  - The administrator only processes the necessary amount of personal data regarding data subjects with respect to the purpose of the processing.

- c) In the case that the inaccuracy of processed personal data is discovered, the administrator shall correct these data without any undue delay.
- If the data subject informs the administrator about a change regarding his or her personal data, the administrator will without any undue delay enter this change into his or her processed personal data;
  - In case that the administrator finds out about a personal data change in different way, the administrator shall also enter this change into the processed personal data of the affected data subject.
- d) The administrator does not store personal data longer than is necessary for the purposes for which the personal data are processed.
- Personal data which were used for a specific reason are erased or shredded by the administrator after this purpose has been achieved;
  - The administrator regularly updates the summary of processed personal data and regularly erases or shreds those which are not necessary for achieving the purpose of processing;
  - An exception to this is processing for the purposes of statistics and archiving, when it is possible to keep these data stored for a longer period.
- e) The administrator processes data in a manner that ensures proper security.
- The administrator will not make personal data available to an unlimited scope of persons;
  - The administrator makes processed personal data available only to those persons for whom the declassification is legitimate.

### III. Purposes of personal data processing

The administrator always processes personal data for legitimate purposes which are usually obvious to the data subjects.

For most purposes, personal data is processed directly on the basis of a contract, the valid interests of Arena or based on the law. This processing occurs without any necessary consent from the data subject.

The valid interests of the administrator include its interest in the protection of the administrator's property, the provision of safety personnel in the Arena, the enforcement of compliance with the provisions of the Visiting Regulations and the enforcement of compliance with imposed sanctions.

The administrator processes personal data for following purposes:

- The sale and administration of tickets requiring a name (hereinafter referred to as "**Nominative tickets**");
- Providing club seat and related services;
- Personal data processing for marketing purposes based on consent of the data subject;
- Processing for purposes of sending a newsletter based on a valid interest of the administrator;
- Processing for the purposes of executing administrator decisions;

- Securing visitor's safety during sports events;
- Securing protection of own property.

#### IV. Categories of personal data processing

For the above-mentioned processing purposes, the administrator processes the following categories of personal data:

- First name and last name;
- Residence;
- Date of birth;
- Contact details and details necessary for communication;
- Photographs;
- Biometric data in the form of facial biometric templates.

The scope of data processing always depends on each particular processing purpose, nevertheless it always obeys the principle of the minimization of personal data resulting from GDPR.

#### V. Subjects' consent to personal data processing

The administrator processes personal data only provided that the administrator does not dispose of the personal data processing of any other legal title within the meaning of section 6 of GDPR. Personal data processing on the grounds of data subjects' consent always obeys the following principles:

- Consent is freely given;
- Consent is required within the meaning of section 7 subsections 1 and 2 of GDPR, i.e. in a way that consent is provable. If the consent is required in written form, it is always distinguishable from one another and it is comprehensible and easily accessible through the usage of clear and simple lingual means;
- Consent is revocable by a means that is minimally as simple and quick as was used to award it. The data subject is always informed about this right together with the application for their consent to personal data processing;
- Consents are stored for a sufficient time period so that the awarding of consent can be proved;
- Consent is never required for processing when administrator disposes of another legal title for processing within the meaning of section 6 of GDPR;
- In case that there are processed personal data regarding subjects younger than 15 years of age, consent of their legal representative is required;
- In case that consent is revoked, the administrator is obliged to stop processing the affected subjects' personal data without undue delay, i.e. usually erase it or shred it.

#### VI. Processing of special categories of personal data

Personal data, which are by their own nature especially sensitive, deserve special protection in accordance with section 9 of GDPR regarding fundamental rights and freedoms. The need for special protection arises from the fact that during the processing of these data, there is the possibility of serious risks to the fundamental rights and freedoms of the data subject. These data are classified as "special data".

In general, this concerns data that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

- The administrator processes special category of personal data, which is biometric data in form of biometric template.

In connection with all the above-mentioned, the administrator would like to point out that facial recognition technology may be applied at SINOBO STADIUM.

## VII. Providing information concerning personal data to data subjects

The administrator provides all information to data subjects that is related to the processing of his or her personal data in a brief, comprehensive, obvious and transparent way.

- The administrator has the obligation to provide data subjects with confirmation of the processing of his or her personal data and also to grant the data subject access to this personal data;
- The confirmation concerns the following information – the processing purpose, categories of processed data, other recipients of the personal data, the planned time period for which the personal data will be processed, the existence of the right to request from the administrator rectification or erasure of personal data, the right to lodge a complaint with a supervisory authority including all available information regarding the source of personal data, if the personal data was not obtained directly from the data subject;
- The administrator also has the obligation to provide the data subject with a copy of his or her processed personal data if the data subject expressly requests it – it is possible to charge a data subject with an administration fee based on administrative expenses;
- In case that the data subject requests a copy in electronic form, it is preferred that the data be sent back to him or her also in electronic form, unless he or she expressly requests another form;
- The data subject can lodge a complaint with a supervisory authority, which is in this case the Office for Personal Data Protection.

## VIII. Right to erasure, rectification and to object

Here are listed the procedures to assist data subjects exercise their rights in connection with lodging a request concerning personal data erasure or rectification and to exercise the right to object. It is necessary to acknowledge that the right to erasure only concerns those data subjects whose personal data are processed on the grounds of their consent. These requests must be allowed to be lodged in an electronic way. The administrator has the obligation to react to requests made by data subjects without any undue delay (in case that the administrator does not have the intention to grant these requests, the administrator has the obligation to present reasons for this decision within one month).

- In case a data subject lodges a request concerning the erasure or rectification of personal data, this request will be granted without any undue delay if it is based on legitimate reasons;
- The request concerning erasure does not have to be granted if there are other legal or contractual reasons for the processing of personal data;
- In case of the exercise of the right to object, the administrator will examine the legitimacy of the reasons to exercise this right. In case the reasons are legitimate, the data will no longer be processed (during the examination of the legitimacy of the reasons, the processing is restricted).

## IX. Restriction of processing

In case that a request concerning the right to restriction processing is lodged, it will be examined whether the circumstances for these restrictions have been met.

- If the accuracy of personal data is denied by the subject – the processing of personal data is restricted during the time period that is needed to verify the accuracy of the personal data;
- Processing is restricted in the case that:
  - The administrator no longer needs the data for processing purposes, but the data subject requires it to raise, exercise or defend legal claims;
  - The data subject has exercised their right to object to processing and it has not yet been proved that this objection is well-founded.
- In case of a processing restriction, personal data can be processed only if they are based on consent or based on exercising or enforcing legal claims or based on the protection of another natural or legal person or based on an important public interest;
- In case of cancelling a processing restriction, the subject must be informed regarding the reason to cancel this restriction.

## X. Notification obligation

Each data subject must always be provided with sufficient information concerning how his or her personal data is handled or if there are any changes to records consisting of his or her personal data etc.

- In case that there is any rectification, change, erasure or restriction of personal data processing, the data subject has to be informed about these changes.

## XI. Data portability

The administrator collects data in the most structured and complex form so that the administrator can transfer them to another administrator in case that the data subject requests it. The data subject has the right to transfer his or her personal data and the administrator cannot refuse this transfer. On the contrary, the administrator has the obligation to do it.

## XII. Personal data processing by other processors or recipients

In case that it is required for other recipients to process personal data which are handled by the administrator, the administrator will require guarantees regarding the fact that these data are handled in the same standard as results from these Principles and the valid legislation.

A relationship of joint administrators exists between Arena and SK Slavia.

The following categories of processors process personal data for the administrator:

- A provider for mailing solutions;
- A provider for database solutions;
- A provider for check-in solutions;
- Security agency;
- Football clubs in the Czech Republic.

## XIII. Automated decision-making, including profiling

The administrator does not utilize the systems of automated decision-making or profiling concerning personal data processing.

#### **XIV. Notification of a personal data breach to the data subjects**

If it is probable that a particular security breach might result in a high level of risk to the rights and freedoms of natural persons, the administrator shall immediately inform the data subject (e.g. in the case of document leakage, meaning the removal of personal data from the registered office of the administrator).

#### **XV. Summary**

This document provides information regarding the principles that are observed by the administrator in accordance with GDPR during the personal data processing of natural persons, which occurs as part of the business activity of Arena as an administrator.