

## PERSONAL DATA PROTECTION RULES

1. This Privacy Policy applies to the protection of personal data processed by the Company Klub Kvapka LTD, with its registered office at T. Milkina 2, Trnava 917 00, Business ID: 36 364 207, registered in the Commercial Register of the District Court Trnava, Section: Ltd. , File No .: 18572 / T (hereinafter referred to as the “Operator” or just “we”).
2. This Privacy Policy describes in particular what types of personal data are processed by us and how they are received, stored, used and collected in your use of our services.
3. We are primarily responsible for the personal information you provide, and you can contact us at any time personally, by telephone, or by email:

Klub Kvapka s.r.o.

T. Milkina 2 Trnava 917 00

Klub Kvapka s.r.o.

Slnečná 1000/32 Trnava 917 01

Tel. No .: 00421 908 716 734 E-mail: [info@klubkvapka.sk](mailto:info@klubkvapka.sk)

### Processing of personal data related to the course:

4. If you decide to sign up for any of the courses we provide to our customers, we process your personal data in connection with the fulfilment of contracts concluded between us. For this purpose, we process your personal data in the following list: name, surname, permanent address, contact phone number and e-mail address. Your phone number and e-mail address are processed by us in order to inform you about the possible dates of the courses, about their cancellation, or about the possibility to register for another date of the course.
5. If you have decided to sign up your child in our courses, for this purpose we need personal information about the child in the following range: name, surname, date of birth and permanent residence. For us, the data of the child is necessary for the proper fulfilment of the contract and therefore the determining which child will be attending the course. From the point of view of a legitimate interest in your child, we also process the date of birth of the child, in order to ensure that we can properly run the courses and ensure that the appropriate course for the child is properly identified.
6. We are authorised to provide your personal data (provided to us by you under paragraph 4 and paragraph 5) to other persons for the purpose of processing personal data on our behalf, for example for the purpose of storing personal data or for the purpose of creating a list of visitors to specific courses only to the extent necessary. Your personal and child data may also be accessed by those who ensure the proper functioning of our website if you have provided personal information online and by sports professionals who conduct courses with you.

In relation to the above, these include, among other, the organisations:

- freevision p. r. o., with its registered office at Černyševského 10, Bratislava 851 01, IČO: 46 792 511, registered in the Commercial Register of the District Court Bratislava I, section Sro, file no. 83433 / B
- Hetzner Online GmbH, established in Industriestr. 25, 91710 Gunzenhausen, Germany

7. For the preparation, conclusion and performance of the contract We use your personal data for the time necessary to execute the contract. At the end of this period, we will continue to store data for legitimate interest and internal records and control purposes for the duration of the limitation period (3 years) and one year after its expiration with respect to claims made at the end of the limitation period. In the event that legal, administrative or other proceedings are initiated, we process your personal data to the extent necessary for the entire duration of such proceedings and the remainder of the limitation period after its termination. Our legitimate interests in such processing are the protection of legal claims and the control of the proper provision of services. The Operator shall process personal data for the purpose of fulfilling legal obligations for a period of 10 years.
8. Unless you give us explicit consent to the processing of your personal data and your child's personal data for purposes other than performing the contract, fulfilling our legal obligations, or within our legitimate interest, will only process your personal data as described above.
9. In case that you refuse to provide us with your personal information in our communication regarding the conclusion of the contract, we will not be able to sign a contract with you.

### **Processing of personal data by consent**

10. In connection with your personal data, we may contact you with the possibility of granting consent to the processing of your personal data for various purposes other than the actual mentioned in the contract.
11. Consent to the processing of personal data may only be granted by a person aged 16 or over. If you are under 16 years of age, your guardian (parent) may give your consent to the processing of personal data. Only the parent of the child can approve the processing of the child's personal data.
12. The granting of consent to the processing of personal data is voluntary and in connection with its non-granting you will not be in any way shortened to the services you have ordered from us, or you are about to order. However, by not consenting to the processing of personal data, you may limit the possibility of our promotion of children's swimming and our overall activity with them. You will always be notified in advance of the specific purpose of the consent.
13. We need consent to the processing of your personal data in connection with the publication of photographs and audio-visual records of our courses. All of it for the purpose of marketing and promoting children's swimming in connection with our activities.
14. We process your personal data for the purposes of marketing activities of our company to the extent of: recorded voice and your image, or your child's voice and image. Such consent is required of you separately when registering for the course, or prior to the start of the course, while keeping such personal data for 3 years.
15. In case you provide us with your personal information for the above, for the mentioned purpose, we may publish them in particular on our promotional items, on our website or via the Facebook and Instagram social networks and thus process it through Facebook Ireland Ltd. 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.
16. If you give us the consent mentioned above, we will only process your personal data for a certain period of time, namely for the above-mentioned period of 3 years, or shorter if you will withdraw your consent, or put into practice any of your rights mentioned below which may result in the deletion of your personal information.

## Use of cookies

17. Cookies are small files that are stored on your device (laptop, tablet, smartphone ...) while browsing our site, which are then recognised and read by us. Cookies may be divided into several categories, one of which is how long these cookies are stored on your device. There are cookies that are deleted as soon as you leave our site or internet browser, and those that remain on your device after you leave the page.
18. The cookies used by us, help us in the proper functioning of our website, in obtaining information about the malfunction of different parts of our site, or when it is repaired. Cookies also help us find out from what source people have information about us, how many people have visited our site and so on.
19. In principle, we can divide the cookies we use into two basic types, as follows:
  - a. Functional and technical cookies: These cookies also help the proper functioning of our site, allow you to log in to various courses etc. Without these cookies our site would not work properly. Cookies of this kind also allow us to remember your login when you visit our website, which means that you do not have to log in repeatedly when you visit. These cookies do not give us any access to your personal data, which means that we do not ask you for your approval to use them.
  - b. Analytical Cookies: These cookies are used to inform us about the traffic to our site, how you are using it, and how you find out our site. We do not collect any personal information about you, based on these cookies. All these information about our site is only accessible to us in a general, anonymous and sufficiently secure manner. For this reason, we do not ask you to approve to the use of such cookies.
20. In connection with the use of cookies, your personal information may also be provided to third parties, in particular:
  - Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland
21. There are a number of ways to restrict or limit the use of cookies, or how to delete them from your browser. One of the easiest ways is to disable the use of cookies in your Internet browser or delete saved cookies. You can find out how to restrict and delete cookies through your browser provider and manual how to use it.

## Your privacy rights

22. If you have provided us with your personal data, or personal data of your child, you get into the position of so-called the concerned person. As a concerned person, in our company you may put to practice the following rights:
  - the right to access **your data**. At the request of the concerned person, the operator shall issue a confirmation if the personal data concerning the concerned person are being processed. If the operator processes such data, he / she shall issue a copy of the personal data of the concerned person upon request. In addition to the above, the concerned person shall also be provided with information about the purpose of the processing, the category of personal data processed, the identification of the recipient or category of recipients to whom the personal data have been provided, retention period of storing personal information, information about source from which the information were obtained, about existence of automated individual decision making, including profiling. The first copy,

referred to in the previous sentence, shall be free of charge. For any additional copies requested by the concerned person, the operator shall charge a fee corresponding to the administrative costs incurred by the operator in connection with the issue of the copy. If a concerned person requests information by electronic means, it will be provided in a commonly used electronic form, by e-mail, unless requested otherwise.

- the right to correct **personal data**, if the operator records incorrect personal data. At the same time, the concerned person has the right to complete incomplete personal data. The controller shall correct or supplement personal data without undue delay after the concerned person has requested it.
- **the right to the deletion** of personal data relating to the data subject, based on the fact that:
  - a. personal data are no longer necessary for the purposes for which they were obtained or otherwise processed;
  - b. the concerned person will withdraw the consent under which the processing is carried out,
  - c. the data subject objects to the processing of personal data regarding the sec. 6.
  - d. personal data was processed illegally,
  - e. the reason for the deletion is the fulfillment of obligations under the Law, a special regulation or an international agreement binding on the Slovak Republic, or
  - f. personal data was collected in connection with the offer of information services to a person under 16 years of age.

The concerned person shall not have the right to the deletion of personal data provided, if their processing is necessary:

- a. to put to practice the right to freedom of expression and information;
- b. to fulfil an obligation under the Law, a special regulation or an international agreement binding on the Slovak Republic, or to fulfil a task performed in the public interest or in the executing of public authority entrusted to the operator,
- c. for reasons of public interest in the field of public health,
- d. for the purpose of archiving in the public interest, for scientific or historical research or for statistical purposes, if the right of erasure is likely to make impossible or seriously difficult to achieve the objectives of such processing, or
- e. for establishing, asserting or defending legal claims.

The controller shall erase the personal data of the concerned person upon request without undue delay after having assessed that the concerned person's request is justified.

The concerned person shall have **the right to restrict the processing of personal data** if:

- a. disputes the accuracy of personal data by an objection under section 6, during the period allowing the operator to verify the accuracy of personal data;
- b. the processing is against the law and the concerned person asks for restrictions on their use instead of deleting personal data;
- c. The controller no longer needs personal data for the purpose of processing, but the concerned person needs it to prove, assert or defend legal claims;

d. the concerned person objected to the processing of personal data on the basis of a legitimate entitlement of the operator until it is verified that the legitimate reasons on the side of the operator outweigh the legitimate reasons of the concerned person.

If the concerned person requests a restriction on the processing of his / her personal data, the operator shall not perform any processing operations without the concerned person's consent, except for the preservation or use thereof to assert legal claims.

If the restriction on the processing of personal data is to be cancelled, the operator shall inform the concerned person in advance.

- The concerned person has the right **to transfer the data**, which means obtaining the personal data he has provided to the operator, and has the right to transfer this data to another operator in a commonly applicable and machine-readable format, provided that the personal data were obtained with contracts and their processing is in the form of automated means.
- The concerned person has the right **to object at any time to the processing of his / her personal data** for the reasons relating to his / her particular situation. The concerned person may object to the processing of his / her personal data on the basis of:
  - a. the legal title of performance of tasks carried out in the **public interest** or in the means of a public authority, or the legal title of **legitimate interest** of the operator,
  - b. processing of personal data for **direct marketing purposes**,
  - c. processing for the purpose of **scientific or historical research; or statistical purposes**.

If the concerned person objects to the processing of personal data for the purposes of direct marketing regarding to point (b) of this section, his / her personal data may not be further processed by the operator.

The operator shall assess the objection delivered within a reasonable time. The operator may not further process personal data unless it demonstrates the necessary legitimate interests in the processing of personal data which override the rights or interests of the concerned person or the reasons for executing a legal claim.

The concerned person has the right, at any time, to object to the operator's decision that has legal effects affecting the concerned person or significantly affects him / her if such a decision is issued solely on the basis of the automated processing of his / her personal data. The concerned person has the right to ask the operator to review the issued decision by a method different from the automated form of processing, whereas the operator is obliged to comply with the request of the concerned person in a non-automated way, which means, that the decision shall be verified personally by the authorised person. The buyer does not have this right only if an automated decision is necessary for the purpose of concluding a contract or performing the contract between the operator and the person concerned, if

- this decision is implemented on the basis of a special regulation or an international agreement binding on the Slovak Republic and which also provides the appropriate measures guaranteeing the protection of the rights and legitimate interests of the concerned person or if the data subject expressly agrees.

- The concerned person has the right **to revoke their consent to the processing of personal data at any time**, if the personal data about the person are processed with the consent given.

The concerned person may withdraw his consent by contacting the operator with his request in any selected manner, or by contacting the responsible person, if any. (contact details of the responsible person, if such a person was authorised (the contact information for the mentioned person could be found on the operator's website, in the "Privacy" section).

You may put to practice all of the above rights with respect to your personal data as well as your child's personal data, which personal data you have given us.