

# INFORMATION ON PERSONAL DATA PROCESSING

The provider of the mobile application Sejf (hereinafter referred to as **Application**) GLOBDATA a.s., with its registered office at Na příkopě 393/11, Staré město, 110 00 Praha 1, Company Registration Number 056 42 361, is processing the personal data of Application users (data subjects) in compliance with the Act No. 110/2019 Coll. on personal data processing and the 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 **GDPR**).

This document includes information that we, as a controller of the data, are obligated to provide. If you have any questions about the processing of your personal data, you can contact us at [info@globdata.cz](mailto:info@globdata.cz), +420 267 090 338, or at GLOBDATA a.s., Staroměstské náměstí 608/10, Praha 1. You can also exercise your rights in writing through the aforementioned means.

## Principles relating to processing of personal data

- Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.
- Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Personal data shall be accurate and, where necessary, kept up to date. If the personal data are inaccurate or incomplete, they will be corrected, deleted, or their further processing will be suspended.
- Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- Personal data shall be processed in a manner that ensures appropriate security of the data.

## **Legal basis for personal data processing**

The legal bases for personal data processing are the following: Performance of an agreement – Your personal data are necessary for the purpose of entering into an agreement and the subsequent performance thereof. Compliance with legal obligation – The processing of your personal data is necessary for the purpose of fulfilling our legal obligation as a controller. Legitimate interests – The processing of your personal data is necessary for the purposes of our legitimate interests, except where such interests are overridden by your interests or fundamental rights and freedoms.

## **What is Application used for?**

Application provides means of purchasing parking, public transport, or entry tickets for persons with whom GLOBDATA a.s. entered into the relevant agreement. In some cases, the service provider has entered into an agreement with a third party. In accordance with this agreement, the third party has entered into an agreement with GLOBDATA a.s., and on the basis of this agreement GLOBDATA a.s. offers services of the service provider in Application.

## **What data are processed?**

We process the following personal data:

- essential identification data – Vehicle Registration Plate Numbers and other data necessary to fulfil contractual obligations;
- contact information – mobile number and e-mail address;
- information on ticket verifications made upon entering the event premises, parking lots, parking zones or during ticket checks in public transport.

Data are processed only in relation to (i) the specific usage of a parking service, (ii) ticket checks in public transport and (iii) the use of a ticket. A mobile number serves as the user identifier for generating tax receipts. We also collect information on the used payment method, but only in an incomplete form.

## **Transfer of personal data**

We share your personal data with the end providers whose services were ordered and purchased via Application. Therefore, we must provide your personal data to authorities such as tax authorities, courts, law enforcement, or capital market supervisory authorities. Your personal data will not be transferred to countries outside of the European Union or European Economic Area or to any international organizations. Should this change, you will have the option to grant consent to transfer your personal data to third countries and international organizations.

## **Storage period of personal data**

Your personal data will not be stored for longer than the maximum duration permitted by law. After this period expires, your data will be safely and irreversibly anonymized so it cannot be misused.

## **Security of personal data**

To ensure a level of security appropriate to the risk stemming from the nature of the data and its processing, we've implemented appropriate technical and organizational measures that take into account the state of the art in technology and the cost of implementation of the measures. Access to the personal data is limited to authorized recipients who require it.

After assessing data security risk, we implemented security measures to protect your data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted through a network and otherwise unlawful forms of processing.

The personal data are not automatically evaluated or processed and cannot be used for the profiling of natural persons, direct marketing or other activities of GLOBDATA a.s.

## **What permissions does Application require?**

- geolocation (location and zone determination) – Application does not collect and store geolocation data. It is only used to filter the service offers
- camera (scanning QR codes) – Application does not save or send the picture
- notifications
- Internet access

## **Data logging**

We inform you that if an error occurs in the Application, a third party will record it on your mobile device along with the relevant data. This data can include your device's IP address, name, version of the operating system, Application configuration, time and date of use of Application, and other data.

## **Changes in personal data processing**

Should the personal data processing policy change in the future, the changes will be disclosed on this website.

### **Your right to information about the processing of your personal data**

#### **1. Right of access**

You have the right to request information from the controller about whether or not is your personal data being processed and if it is, you have the right to be informed about the purposes of the processing, the categories of the personal data concerned, the recipients or categories of the recipients, the envisaged period for which the personal data will be stored, information about your rights (the right to request rectification or erasure of personal data, or restriction of processing of the personal data concerning the data subject, or to object to such processing), the right to lodge a complaint with The Office for Personal Data Protection, information concerning the source of the personal data, the existence of automated decision-making, including profiling and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you, of the appropriate safeguards relating to a transfer to a third country or to an international organization. You have the right to obtain a copy of the personal data being processed. The right to obtain a copy must not adversely affect the rights and freedoms of others.

#### **2. Right to rectification**

Should a change occur in any data that could be classified as personal data, such as a mobile number, you have the right to obtain the rectification of the processed personal data from the controller. You also have the right to have the incomplete personal data completed, including by means of providing a supplementary statement.

#### **3. Right to erasure (Right to be forgotten)**

In certain established circumstances, you have the right to demand the erasure of your personal data from a controller. Such circumstances include the case in which the personal data are no longer necessary in relation to the aforementioned purposes. The controller deletes the personal data automatically after a necessary time period. However, you can still submit a request for erasure at any time. Your request is then subject to an individual assessment (the controller may be obligated to or have legitimate interests in keeping your personal data), and you will be informed of the assessment's result in detail.

## **4. Right to restriction of processing**

The collector processes your personal data only to the extent that is strictly necessary. Should you feel that a controller is, for example, overstepping the boundaries of the aforementioned purposes for data processing, you can submit a request to have your personal data processed solely for the needed legal reasons or to have your personal data blocked. Your request is then subject to an individual assessment and you will be informed of the assessment's result in detail.

## **5. Right to data portability**

Should you wish for the controller to transmit your personal data to a different collector or a different company, the collector will transfer your personal data in an appropriate data format to another collector if no legal or otherwise significant obstacles prevent the original collector from doing so.

## **6. Right to object and automated individual decision-making**

Should you learn or have a reason to believe that the controller processes your personal data in breach of the protection of your private and personal life or out of accordance with the law (provided that the personal data are by the controller processed on the basis of public or legitimate interests or for direct marketing purposes, including profiling, or for statistical purposes or for purposes of scientific or historical interests), you can request an explanation or rectification of the situation by the controller. You can also express an objection to individual decision-making, including profiling.

## **7. Right to lodge a complaint to The Office for Personal Data Protection**

You may contact the supervisory authority, The Office for Personal Data Protection, located at Pplk. Sochora 27, 170 00, Praha 7, website [www.uoou.cz](http://www.uoou.cz), with any complaints or suggestions regarding personal data processing.

## **8. Right to withdraw consent**

You have the right to withdraw your consent to personal data processing at any time. Depending on how the consent was obtained, you can do so by filling out a form, checking off a box, sending your withdrawal to the controller's office, or using a link in the e-mail communication.