

## **Crowning Arts Privacy policy**

This Privacy Policy is intended to inform you of Crowning Group a.s. (hereinafter referred to as **"Company"**, **"We"** or **"Us"**) practices regarding the collection and use of your data that you may submit to us through the website crowningarts.com or CrowningArts app (hereinafter referred to as **"Platform"** or **"CrowningArts"**). Privacy Policy was last amended on 23 June 2022. With respect to changes in legislation, we might change this Privacy Policy from time to time. Please, read following paragraphs carefully. You should find all necessary information herein. If you have any further questions regarding privacy, collection or processing of your personal data, you can always contact us at [assistance@crowningarts.com](mailto:assistance@crowningarts.com)

### **1. Personal data**

All personal data voluntarily provided to the Company by the user are collected, processed and used in accordance with applicable privacy laws and regulations, especially General Data Protection Regulation (regulation in EU law on data protection and privacy in the European Union and the European Economic Area, hereinafter referred to as **"GDPR"**). Privacy Policy covers data collection and processing carried out by the Company. The Company is not responsible for the privacy practices of any other third parties.

The Company does not knowingly ask for information or collect data from persons under the age of 16. The Website can be used by persons under the age of 16 with previous verified consent of their parent or legal guardian. If we learn that the information is collected without such consent, we delete that information.

### **2. Who processes your personal data?**

Your personal data are processed by Crowning Group a.s., joint-stock company, business identification no. 041 33 684, registered seat at Plaská 614/10, Malá Strana, Praha 5, the Czech Republic, postal code 150 00, registered in the Commercial Register maintained by the Municipal Court in Prague under Section B, Insert 20680 (data controller)

### **3. What personal data are processed and who are the recipients of your personal data?**

We collect personal data you provide us voluntarily while using CrowningArts, including your e-mail address, name and surname, date of birth, phone number, address, your location, social media profile information. If you provide us with personal data of third parties, it is your responsibility to inform the person concerned and secure their consent to this Privacy Policy.

We also automatically collect technical data, such as IP address, the type of device accessing CrowningArts, time spent on the Platform, exact time you visited the Platform, your surfing habits, type of browser and operating system you use, Platform language preference and similar information. That information helps us improve your browsing experience. In certain cases, it is possible to use technical data and identify you by them as an individual, thus making them personal data according to applicable legal regulations.

We also use 3<sup>rd</sup> party services provided by external suppliers. In some cases, these services also include partial processing of personal data. The Company shares personal data with its suppliers to the necessary extent only. These suppliers are contractually bound to keep the personal data in confidence and to protect the personal data the same way as the Company does.

These suppliers include, in particular, the following categories of trusted service providers:

- providers of technical services (e.g. hosting, data centre, IT support);
- banks, providers of payment services;
- legal counsels, tax, accounting services;
- marketing providers;
- communication providers;
- analytics providers.

#### **4. Use of Cookies**

Substantial part of the personal data processing and collecting is related to the **Cookie Policy**.

Cookies are small text files that are stored on your device by the websites. Session-based cookies contain information stored into a temporary memory location and are deleted automatically as soon as you close your browser. Permanent cookies are data files capable of providing websites with user preferences, settings and information for future visits – this type of cookies last until they expire or until you or your browser delete them.

The Website uses its own functional cookies (1<sup>st</sup> party cookies) necessary for the efficient functionality of the Website. The Website informs you about the use of cookies on your device as soon as you enter the Website for the first time. In addition to that, the Website asks you for your consent with another 1<sup>st</sup>, as well as 3<sup>rd</sup> party cookies used for different purpose than sole functionality of the Website. These cookies will be stored in your browser only with your previous consent. You are allowed to revoke your previous consent with cookie use in Cookie Policy at any time in footer of CrowningArts website. 3<sup>rd</sup> party cookies also help us analyze and understand how you use the Website and improve your browsing experience.

In addition to that, the browser allows you to set your preferences whether the cookies may or may not be stored on your device. Relevant developer's website provides information how to set up your browser. The Company respects your browser settings.

#### **5. What are the purposes and legal basis for processing of your personal data?**

The purposes for which we use your personal data may differ based on the service we provide and the type of communication between you and us.

We process your personal data especially for the following purposes:

- to provide service;
- to provide information and products you requested from us;
- to identify the contracting party before the conclusion of the contract;
- to carry out obligations arising from any contracts entered between you and us;
- to manage your CrowningArts account;
- to notify you of changes to our services;
- to process your payment transactions;
- to comply with applicable laws and regulatory obligations;
- to manage our business operations and IT infrastructure;
- to understand how you use our services to give you the best browsing experience; • to improve and develop new services based on user behaviour – using anonymised, aggregated data; • to measure

traffic on the Website;

- to keep our services secure and safe;
- to manage complaints, feedback and queries, and handle requests for data access or rectification, or the exercise of other rights related to personal data;
- for direct marketing of our services.

We process your personal data on legal basis hereunder:

- contractual obligations entered into by you and us;
- your explicit consent given to specific purposes;
- compliance with legal obligations;
- legitimate interest of the Company or third parties.

## **6. Do we transfer your data to countries outside the EU/EEA?**

Digital world has almost no boundaries and offers easier international collaboration than any other industry. We use solutions provided by EU/EEA based companies, as well as US based companies. US companies are required to provide equivalent level of protection for personal data of their EU based data subjects to the protection guaranteed by GDPR.

If we are involved in a merger, acquisition or other similar type of restructuring, your information may be transferred as a part of the deal. We will notify you (e. g. via an e-mail associated with your account) of such deal and outline your options.

## **7. How long do we store your personal data?**

Personal data are stored as long as necessary for the purpose for which it was processed. The length of time that the Company holds your personal data depends on the legal basis of processing.

Data processed based on performance of a contract: the data are processed for the duration of the contractual relationship and for an applicable limitation period.

Processing based on your consent: personal data are processed until you revoke your consent.

Data processed based on legal obligations: the data-retention period is prescribed by applicable legal regulations.

Processing based on legitimate interest: data are being processed for as long as the given legitimate interest of the Company or 3<sup>rd</sup> party (external supplier) is in place.

Bear in mind that the same data may be processed based on other legal basis, in which case your revocation of consent or request to delete all your data might not mean full erasure of your data.

For more details related to specific time we store your data, e-mail us at

[assistance@crowningarts.com](mailto:assistance@crowningarts.com)

## **8. Data safety**

The Company is obliged to protect the user's personal data against unauthorised interference. Personal data is protected against loss, theft, unauthorized access, disclosure, alteration or destruction, using appropriate physical, technical, and administrative security measures. The Company uses number of security measures, including password protected directories and databases, SSL technologies for the encryption and secure transmission of personal data on the Internet or physical access control of the relevant hardware.

Communication between your device and servers is encrypted. Login details (including your password) are hashed and all your data are stored on servers in secure data centres with limited and carefully controlled access.

In the case of security breaches that are likely to adversely affect your privacy and occur despite security measures, we will take immediate protective precautions and notify you as soon as possible via e-mail attached to your account.

## **9. Your rights related to personal data**

Under the GDPR, the user is granted certain rights related to the processing of his personal data. The Company is obliged to use, collect and process personal data in such a way that the user and other persons do not suffer harm to their rights.

### **9.1. Right of access to your personal data and data portability**

The user has the right to request information about processing of his personal data and to request a copy of such personal data. If personal data are processed in fully automated manner and are kept in a structured machine-readable format, the user is entitled to request a copy of such data in the same machine-readable format. The user also has the right to request the Company to transfer such data to another administrator, if technically possible.

### **9.2. Right to rectification**

The user can rectify their personal data processed by the Company through "Edit profile" section. If the user deems the personal data the Company processes are inaccurate, out-of-date or otherwise incorrect, they are entitled to inform the Company and request a correction.

Invoice details cannot be changed in accordance with the applicable legislation. Such data can only be changed if the user has not yet received or paid for the goods or services.

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

The user is entitled to object to processing of their personal data if it is inaccurate, no longer necessary or are processed illegally. The user will be informed of the assessment of the objection.

In this case, we can only process your personal data with your consent (except for the saving or backup of these personal data).

### **9.4 Right to Erasure ("Right to be Forgotten") - Account and Data Deletion Process**

#### **9.4.1 Account Deletion Process:**

**1. Login:**

The user must log in to their account on the website [www.crowningarts.com](http://www.crowningarts.com).

**2. Account Settings:**

The user navigates to the "**Account Settings**" or "**My Account**" section, where they will find the option to delete their account.

**3. Confirmation:**

Upon selecting the option to delete the account, the user will be prompted to confirm their decision.

**4. Identity Verification:**

To secure the process, the user will likely be asked to re-verify their identity, such as by entering their password or other verification steps.

**5. Deletion Confirmation:**

After successfully confirming the deletion of the account, the user's account and all related data will be marked for removal.

**9.4.2 Deletion Timeframe:**

Upon receiving the request for account and data deletion, the deletion process will commence immediately. However, complete deletion of data may take up to 30 days depending on legal requirements and technical feasibility.

**9.4.3 Scope of Deletion:**

All personal data associated with the user's account will be deleted in accordance with data protection requirements. This includes profile information, transaction history, contributions, and any other data that may be linked to the account.

**9.4.4 Consequences of Deletion:**

Upon deletion of the account and data, the user will lose access to their account and all related information. Deleted data cannot be restored.

**9.4.5 Contact Information:**

In addition to the procedure outlined in section 9.4.1, users may contact support at the email addresses [assistance@crowningarts.com](mailto:assistance@crowningarts.com) or [office@crowningarts.com](mailto:office@crowningarts.com) to request account and data deletion.

**9.5. How to exercise your rights – how to object or file a complaint**

We always process your personal data on the legal basis listed in Article 5 of this Privacy Policy. If we process your personal data on the basis of a legitimate interest, you have the right to object to such processing.

If you wish to file a complaint in regard to the processing of your personal data by the Company, you might contact us at [assistance@crowningarts.com](mailto:assistance@crowningarts.com). The Company resolves objections and other inquiries related to data processing within one (1) month and informs you how we solved your request.

You also have the right to lodge a complaint with our supervisory authority seated in the Czech Republic, Prague (the country and city of the Company residence):

**The Office for Personal Data Protection**

Pplk. Sochora 27

170 00 Prague

Czech Republic

If any problem related to you privacy or data protection on CrowningArts platform occurs, please always contact the Company first and we will gladly try to solve such problem towards your satisfaction.