

## PRIVACY POLICY

pursuant to Regulation (EU) No 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 (hereinafter also referred to as "**GDPR**").

Dear visitors, this policy contains the most important information about your personal data processed by **Heroes Store s.r.o.**, with registered office at Národní 63/26, Postal Code: 110 00, Prague 1 - Nové Město, Czech Republic, ID No.: 214 67 641, registered by the Municipal Court in Prague under file number C 402369 (hereinafter referred to as "**Heroes Store s.r.o.**"), in accordance with GDPR.

The purpose of this policy is to inform you about the processing of personal data that occurs in connection with your visit to our website available at: <https://heroespark.cz>, in connection with the provision of our newsletter and in connection with our marketing activities, including contests and advertising (hereinafter referred to as "**Services**"), as well as about some other cases of processing of your personal data that may occur during your visit to the Heroes Store experience store, located in the premises of Máj Národní at Národní 63/26. Praha 1, Nové Město 110 00 Praha 1 (hereinafter referred to as "**Heroes Store**").

Please note that depending on the nature of the Services you use, special personal data processing policies may apply to you and will be duly communicated to you where applicable.

### 1. IDENTIFICATION OF THE DATA CONTROLLER

#### 1.1. Personal data controller

The controller of your personal data is the company **Heroes Store s.r.o.** (hereinafter referred to as the "**Data Controller**" or as "**we**").

#### 1.2. Role of the Data controller

The Data controller has entered into several data processing and service contracts with service providers, which technically enables you to use our website.

#### 1.3. Purpose of processing personal data

The Data controller processes your personal data according to your choice for the following purposes:

- a. voucher sales online;
- b. subscribing to the newsletter in order to receive the newsletter;
- c. marketing activities, including analysis of your use of the Heroes Store Services, as set out in more detail in Article 5 of this Policy, in order to provide you with relevant offers and competitions;

- d. advertising and sending you communications about events taking place in the Heroes Store;
- e. improving its services;
- f. care for you as a visitor.

## **2. METHODS OF COLLECTING PERSONAL DATA**

### **2.1. We collect your personal data in the following ways:**

- a. directly from you, or
- b. based on your use of the Services when using the website and your consent to the use of cookies, we collect the cookies you receive as detailed in the cookies tab.

For details on the processing of your personal data, please refer to the table set out in Article 5 of this Policy.

## **3. SHARING OF PERSONAL DATA**

### **3.1. Sharing of personal data**

We may share your personal information with:

- a. our processors who act according to our instructions;
- b. relevant authorities or legal entities to fulfil legal or regulatory requirements;
- c. acquirers in the event of a sale or transfer of our assets or a portion thereof;
- d. with our insurers, lawyers, auditors, tax advisors, and other consultants;
- e. courts for enforcing claims and protecting our legal position; and
- f. partners who provide services on our websites, with these services subject to the partners' terms of use and privacy policies.

## **4. DATA PROTECTION**

### **4.1. Data security**

The security of all personal data we process is our priority. For this reason, we have put in place appropriate technical and organisational measures and carefully select our service providers, consultants and business partners.

### **4.2. Personal data processing contracts with our providers**

We have entered into data processing agreements with each of our service providers to the extent required by applicable law and have verified their technical and organisational measures. These companies are only authorised to process your personal data in accordance with our instructions.

## 5. INFORMATION ON THE PROCESSING OF PERSONAL DATA

### 5.1. Newsletter/website/marketing activities including competitions

The following table details the following information:

- a. the purpose of processing personal data;
- b. the legal basis for the processing of personal data;
- c. the personal data concerned which we process for the purpose; and
- d. the retention period of the personal data concerned.

| Purpose of processing personal data   | Legal basis for processing personal data  | Personal data concerned  | Retention period  |
|---|---|--|---|
| Selling vouchers online and providing our newsletter as part of direct marketing                                | Performance of the voucher purchase contract and the legitimate interest of the Data Controller in processing the data for the purpose of direct marketing, advertising and service improvement | OBTAINED DIRECTLY FROM YOU:<br><br>Your e-mail, your name and surname, your phone number   | 5 years since your last use of our services or last digital contact |
|   |   | OBTAINED INDIRECTLY:<br><br>Information regarding your activity towards the newsletter (whether and how many times you have opened it)     |   |
| Participation in competitions for visitors and sending follow-up marketing communications based on your consent | Performance of the contract relating to the competition   | OBTAINED DIRECTLY FROM YOU:<br><br>Your name and surname, date of birth and personal data related to the competition, i.e. data about your | 1 month from the announcement of the winner                         |

| Purpose of processing personal data  | Legal basis for processing personal data   | Personal data concerned   | Retention period  |
|--|--|---|---|
|  |  | activity in the competition   |   |
|  | your consent   | your e-mail, your name and surname  | 5 years from the date of your consent                               |
| Register your user account and sending follow-up marketing communications based on your consent  | Your consent   | OBTAINED DIRECTLY FROM YOU:<br><br>Your name and surname, date of birth, your email and your phone number | 5 years since your last use of our services or last digital contact |
| Taking care of you if you attend events organised by the Heroes Store and sending you communications about events held at the Heroes Store | Your consent and the Data controller's legitimate interest in administering the Heroes Store events and ensuring their safe conduct or your consent    | OBTAINED DIRECTLY FROM YOU:<br><br>Your e-mail, your name and surname, your phone number                  | 6 months after the event or 5 years from the date of your consent   |
| Analysis of the services you use with a view to improving them   | Legitimate interest of the Data Controller in the processing of personal data for the purpose of direct marketing, advertising and service improvement | OBTAINED DIRECTLY FROM YOU:<br><br>Any information you provide to us                                      | 5 years since your last use of our services or last digital contact |
|  |  | OBTAINED INDIRECTLY:<br><br>On the basis of your consent, your behaviour on the                           |   |

| Purpose of processing personal data                                       | Legal basis for processing personal data                           | Personal data concerned   | Retention period                                     |
|---|--|---|--|
|   |  | website in accordance with the cookie policy, your use of our wi-fi network and the relevant date you logged on to that network |  |
| Handling requests from visitors regarding the processing of personal data | Compliance with the legal obligations of the Data Controller       | OBTAINED DIRECTLY FROM YOU:<br><br>Your e-mail, your name and surname, in some cases a copy of your identity card               | 5 years from the date of receipt of your application |
| Enforcement of legal claims by the Data Controller                        | Legitimate interest of the Data Controller in its legal protection | Your personal data required for the claim   | The statutory time limit applicable to the claim     |

## 6. YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

### 6.1. Your rights

Under applicable law, you have different rights in relation to the processing of your personal data depending on the specific situation:

**a. Right of access to your personal data**

You have the right to request verification of whether we are processing your personal data and, if so, to obtain a copy of that data.

**b. Right to rectification of your personal data**

If your personal data we process is inaccurate, you have the right to request its correction.

**c. Right to erasure of your personal data**

You may request the deletion of some or all of your personal data.

**d. Right to object to the processing of your personal data**

You have the right to object to the processing of your personal data. This means that you have the right to request that we stop processing your personal data until we can demonstrate that there are compelling reasons for processing it which override your interests, rights and freedoms or where necessary for the establishment, exercise or defence of legal claims. If we object to the processing of personal data for direct marketing purposes, we will immediately stop processing your personal data for these purposes.

**e. The right to limit the processing of your personal data**

You have the right to request the restriction of the processing of your personal data, in particular in cases where you doubt the accuracy, lawfulness or necessity of the processing. In such situations, we will only process your personal data for the establishment, exercise or defence of legal claims, or for the protection of another natural or legal person, or in accordance with another limited reason set out in applicable law.

**f. Right to data portability**

You have the right to request a copy of the personal data you have provided, including in a format that is interoperable, or, if appropriate and technically feasible, you may request that it be transferred directly to another data controller.

### 6.2. Withdrawal of consent

If consent is the legal basis for the processing of your personal data, you may withdraw this consent at any time without giving any reason. Withdrawal of consent does not affect the lawfulness of the processing that took place before the withdrawal.

### 6.3. Unsubscribe from marketing communications

If you do not wish to receive marketing communications, you can request to stop receiving them:

- a. by sending an email to the contact details provided; or
- b. directly by changing the user account settings, if any; or
- c. by clicking on the unsubscribe link in our communications.

### 6.4. Address for exercising your rights

If you wish to exercise your rights, you can contact the following address:

|   |                     |   |
|---|---------------------|---|
| <b>Contact details<br/>of the Data<br/>Controller</b> | Heroes Store s.r.o. | Address: Národní 63/26, 110<br>00 Nové město<br>phone: +420 720 772 006<br>E-mail: info@heroespark.cz |
|---|---------------------|---|

### 6.5. Submission of an application

To exercise your rights effectively, it is important to state in your application:

- a. what personal data is involved; and
- b. which rights you want to exercise.

In order to comply with the protection of third party rights, verification of your identity may be required, including the provision of identifying information such as loyalty card number or date of birth and, if necessary, proof of identity.

We will respond to your request within 1 month of receiving it. If necessary, we may extend the deadline by 2 months depending on the difficulty of processing the request and the current number of requests. We will inform you of any extension within 1 month of receiving your request at our address.

### 6.6. Filing a complaint

If you believe that the processing of your personal data violates applicable data protection laws, you have the right to lodge a complaint with the competent data protection authority in the country of your habitual residence, place of work or place of alleged violation. In the Czech Republic, to the Office for Personal Data Protection, at Pplk. Sochora 27, Postal Code: 170 00, Prague 7, ID No.: 708 37 627.

## **7. CHANGES AND UPDATES TO THIS PERSONAL DATA PROCESSING POLICY**

This Privacy Policy may be revised or updated periodically. Any changes to this policy will become effective when the updated version is posted online. This text has been updated as of 13 November 2024.

In the event that such a change is required by applicable law to be notified to you or to obtain your consent to any new processing set out in the updated version of this policy, you will be notified or asked to consent to the new use of your personal data.