

## **Principles Relating to Processing of Personal Data**

Dear client,

let us kindly inform you how we, Česká filharmonie (Czech Philharmonic) including Galerie Rudolfinum (hereinafter referred to as “*we*” or “*our organization*”), process your personal data to exercise our business activity.

The purpose of this communication is to provide you with the information concerning mainly which personal data we collect, how we process them, from which sources we receive them, for which purposes we use them, whom we may provide them, where you can receive information on your personal data, and your individual rights to personal data protection.

Please, read content of this message; should you have any questions, please do not hesitate to contact us in our seat at the address Alšovo nábřeží 79/12, 110 00 Prague 1, e-mail [info@ceskafilharmonie.cz](mailto:info@ceskafilharmonie.cz) and/or telephone + 420 227 059 227, or questions on the activities of Galerie Rudolfinum at [galerie@rudolfinum.org](mailto:galerie@rudolfinum.org), +420 227 059 348; we will be happy to answer any questions you may have with pleasure.

Furthermore, our Data Protection Officer, Mr. Jiří Bělohradský, e-mail: [dpo@ceskafilharmonie.cz](mailto:dpo@ceskafilharmonie.cz), telephone + 420 602 421 377, is at your service.

### **I. General Information**

With respect to its business activity, our organization is obliged to process certain personal data, specifically to meet contractual obligations. In this context, we would not be able to offer our products/services to you without provision of your personal data.

Besides, we process your personal data beyond the framework of our obligations to provide you and our other clients with customer care to be able to further develop our business relations and address you with targeted offer of our products/services. In doing so, we need to obtain your consent. Given the focus of our products/services, age maturity level shall be respected to give valid consent to personal data processing without the consent of legal representatives of the data subject.

#### **I.1. Principles Relating to Processing of Personal Data**

Processing your personal data, we esteem and respect the highest possible standards of personal data protection and, in particular, we comply with the following principles:

- (a) we always process your personal data for clearly and explicitly defined purpose, using defined means, defined manner and only for the time period necessary for the purpose of data processing; we process only accurate personal data of clients and we have ensured that their processing shall comply with defined purposes and shall be necessary for accomplishment of such purposes;

- (b) we protect your personal data as classified information; therefore, we process personal data of clients in a manner that ensures security of such data including protection against unauthorized or accidental access to personal data of the clients, their amendment, destruction or loss, unauthorized transfers, another type of their unlawful processing as well as another misuse;
- (c) we always clearly inform you about processing of your personal data and your entitlement to accurate and complete information about circumstances of such processing as well as your other related rights;
- (d) in our organization we have introduced and implemented appropriate technical and organization measures to ensure a level of protection adequate to potential risks; all persons, coming into contact with personal data of the clients, are committed to maintain confidentiality about information gathered in relation to processing of such data.

## **II. Information on Processing of Personal Data**

### **II.1. Information about the Data Controller**

We, i.e., Česká filharmonie, with the seat Alšovo nábřeží 79/12, 110 00 Prague 1, company ID 000 23 264, příspěvková organizace, are your data controller.

### **II.2. Purposes and Lawfulness of Data Processing**

#### **II.2.1. Processing of Personal Data without Your Consent**

Usually the situation when you are obliged to give us certain personal data as the precondition for our provision of our product/service or when we are entitled to process your personal data acquired in another manner.

- (a) We are legally entitled to process your personal data without your consent for the following purposes of compliance with our legal obligations, in particular
  - (i) preventing damage to property of our organization;
  - (ii) preventing deception which our organization may be confronted with;
  - (iii) meeting any obligation to identify and control the client according to the Act on Selected Measures against Legitimization of Proceeds of Crime and Financing of Terrorism;
- (b) conclusion or performance of the contract with you.

Specifically, it relates to de facto realization of contractual relationship or another performance of the contract between our organization and you. Among others, personal data are required to accomplish contractual relationship without inadequate

legal risks, including negotiations about conclusion or amendment to the contract with you.

(c) Protection of rights and legally protected interests, especially for

- (i) protection of rights and legally protected interests of our organization, recovery of debts, realization of security or another enforcement of claims, development and advancement of provided services;
- (ii) negotiations with the parties interested in the assignment of claim of our organization to the client or another type of assignment or transfer of the claim, including related realization, and other follow-up negotiations with third parties, in particular informing providers of related securities etc.;
- (iii) solution to the litigant agenda, in particular for the purposes of litigation of legal or other disputes.

(d) Our legitimate interests.

Situations of the contractual/customer relationship between you and our organization.

### **II.2.2. Processing of Personal Data with Your Consent**

Usually the situation when you give voluntary consent to process your personal data. Based on your consent, our organization shall process your personal data for the following purposes:

- (a) exercise of the rights and obligations from the contract concluded with you; the situation when we need to dispose of your personal data perform the contract;
- (b) customer care; activities not constituting performance of the contract or another legal framework of personal data processing, which include the following activities:
  - (i) market research;
  - (ii) tracking behavior of clients visiting web sites of our organization in relation to offered services (i.e., this purpose shall not apply to the sole collection of information about behavior of users visiting web sites of our organization through cookies, described below in the article on electronic media and mobile applications);
- (c) offering products and services; in particular, dissemination of information, offering products and services of our organization through different means (via post, electronic media including electronic mail and messages sent to mobile devices, telephone calls and web sites).

Supply of personal data for performance of the contract and customer care constitute our contractual requirement and failure to provide them may therefore lead to failure to conclude the contract or provide adequate care.

### **II.3. Scope of Processed Personal Data of Clients**

Our organization processes your personal data to the extent necessary to achieve the above-mentioned purposes. We process **contact data** (contact addresses, telephone numbers, e-mail and fax addresses or other similar contact data), **identification data** (name, surname, date of birth, address of permanent residence of the client who is a natural person – for entrepreneurs also company identification number and tax identification number), and **camera recordings**.

### **II.4. Method of Personal Data Processing**

The method, employed by our organization to process your personal data, includes both manual and automated processing in the information systems of our organization and in the materialized form.

In particular, employees of our organization process your personal data; besides, also third parties to the extent necessary. Before transmitting your personal data to the third party, we always conclude a written agreement with such entity, containing the same safeguards governing personal data processing which, in compliance with its obligations, our organization itself meets as well.

### **II.5. Recipients of Personal Data**

In particular, your data are made available to employees of our organization in connection with performance of their work duties, where handling with personal data of clients is necessary; however, only to the extent necessary in each specific case and subject to the compliance with all security measures.

In addition, your personal data may be transmitted to third parties participating in the processing of personal data of clients of our organization or, as the case may be, such personal data may be made available based on another reason in harmony with the law.

Specifically, the data are delivered to:

- (a) our law firm;
- (b) our accounting and tax advisory office;
- (c) our marketing agency;
- (d) processors delivering us server, web, cloud, and IT services.

Before transmitting your personal data to the third party, we always conclude a written agreement with such entity, regulating processing of personal data in a way so as the agreement would contain the same safeguards governing personal data processing which, in compliance with its legal obligations, our organization itself meets as well.

### **II.7. Transmission of Personal Data Abroad**

Your personal data are primarily processed on the territory of the Czech Republic except for data used for marketing purposes in cooperation with The Rocket Science Group LLC as the operator of the mailing system MailChimp, seated in the USA.

## **II.8. Period of Processing of Personal Data**

Our organization processes personal data of clients only for the period necessary for purposes of their processing. We systematically review whether the need to process certain personal data for certain purpose still remains. If we find out that data are not necessary for any of the purposes for which they have been processed, we liquidate them. However, we have already internally evaluated usual period of usability of personal data in relation to certain purposes of personal data processing, after expiration of which we particularly carefully consider the need to process specific personal data for the specific purpose. At the same time, in this context the rule applies that personal data processed for the purposes of:

- (a) performance of the contract - we process for the period of duration of the contractual relationship with the client; furthermore, relevant personal data are usually usable for the period of ten years;
- (b) offering products and services - we process for the period of duration of the contractual relationship; furthermore, relevant personal data are usually usable for the period of ten years;
- (c) customer care - we process for the period of duration of the contractual relationship with the client; furthermore, relevant personal data are usually usable for the period of ten years;
- (d) protection of rights and legally protected interests in the form of camera recordings; furthermore, relevant personal data are usually usable for the period of fourteen days.

## **II.9. Right to Withdraw Consent**

In this message, we have explained reasons why we need your personal data and that for some purposes we can process such data only with your consent. You do not have to give your consent to personal data processing to our organization; at the same time, you are entitled to withdraw your consent. We would like to note that we are entitled to process some personal data for some purposes also without seeking your consent. If in such a case you withdraw your consent, we will discontinue processing of relevant personal data for purposes requiring relevant consent; however, we may be entitled, or even obliged, to further process such data for other purposes.

Should you wish to withdraw your consent to the personal data processing, please contact us in our seat at the address Alšovo nábřeží 79/12, 110 00 Prague 1 or e-mail [dpo@ceskafilharmonie.cz](mailto:dpo@ceskafilharmonie.cz).

## **II.10. Sources of Personal Data**

We acquire personal data of the clients in particular:

- (a) from clients;
- (b) from publicly available sources (public registers, records or lists);
- (c) from potential parties interested in services provided by our organization within the framework of marketing events and campaigns;
- (d) in-house activity, by processing and evaluating other personal data of clients;
- (e) camera recordings.

## **II.11. Your Rights in Connection with Processing of Your Personal Data**

You can exercise all your rights in our seat at the address Alšovo nábřeží 79/12, 110 00 Prague 1 or e-mail [dpo@ceskafilharmonie.cz](mailto:dpo@ceskafilharmonie.cz); at the same time, you can lodge a complaint with a supervisory authority, i.e., Úřad pro ochranu osobních údajů (the Office for Personal Data Protection) ([www.uoou.cz](http://www.uoou.cz)).

**II.11.1. Right of access** means that you may ask us for confirmation at any time whether or not personal data concerning you are being processed, and, where that is the case, the purpose of their processing, scope, recipients to whom your personal data are disclosed, envisaged period for which your personal data will be processed, existence of the right to rectification, erasure, restriction of processing or objection to such processing, where we have collected your personal data and whether, on the basis of processing of your personal data, any automated decision-making, including profiling, is made. In addition, you have right to obtain a copy of the data concerning you, whereas the first provision is free-of-charge; for additional provision we shall be entitled to ask for adequate compensation for administrative costs.

**II.11.2. Right to rectification** means that you may ask us at any time for rectification or completion of your personal data provided that they are inaccurate or incomplete.

**II.11.3. Right to erasure** (the right to be forgotten) means that we must erase your personal data if (i) they are no longer necessary for purposes for which they have been collected or otherwise processed, (ii) processing is illegal, (iii) you object to the processing and no overriding legitimate grounds for the processing exist or (iv) legal obligation requests us to do so.

**II.11.4. Right to restriction of processing** means that until we resolve cases of doubt regarding processing of your personal data, we must restrict processing of your personal data in a way that we may only store them and may possibly use them for the purpose of establishment, exercise or defense of legal claims.

**II.11.5. Right to object** means that you can object to processing of your personal data which we process for direct marketing or legitimate interest. If you raise objection against

processing for direct marketing, your personal data shall no longer be processed for such purposes.

### **III. Electronic Media**

In the context of our business activity, we exploit numerous technologies to provide you with the most comfortable access to us and our products/services; in particular, Internet services and social networks.

**III.1. Social networks.** Among others, you can speak to us through various social networks. Primarily, we use these communication channels as marketing tools; at the moment, we do not provide our products/services through any social network.

**III.2. Cookies.** To provide our products/services, we also use cookies, which are small text files stored on the user's computer during the first visit to our web site. Thanks to cookies, we can trace more easily the way how visitors to our web site work with its content. Thus, we can communicate with visitors friendlier and/or target our marketing more efficiently. You yourself can delete cookies in the settings of your browser.

### **IV. Concluding Provisions**

**IV.1.** This message has been issued for an indefinite period of time and shall enter into force on 1.6.2018.

**IV.2.** We can amend this message by issuing of its new full text; an up-to-date version is published on the web site of our organization and is available in our office at the same time.

**IV.3.** Unless expressly stated otherwise, all information given shall also apply to processing of personal data of potential clients, i.e., entities with whom we have not established any contractual relationship yet, but we are in touch. To a reasonable extent, provided information shall also apply to processing of personal data of other entities with whom our organization is in direct contact, though without any contractual relationship (such as representatives of legal entities).