

## Privacy Policy for NFCtron account users

NFCtron a.s., with its registered office at Opletalova 1525/39, Nové Město, 110 00 Prague 1, Company Identification Number: 072 83 539, registered in the Commercial Register maintained by the Municipal Court in Prague, file mark B 25707 (hereinafter referred to as "we" or "NFCtron"), is committed to providing you with services through the NFCtron account. To provide these services, it is necessary to process personal data. Given that personal data is highly valuable and can be easily misused, NFCtron pays close attention to the protection of personal data, including fulfilling all obligations arising from applicable data protection and privacy laws, particularly, but not limited to, Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, the General Data Protection Regulation (hereinafter referred to as the "GDPR Regulation").

In this document, you will find information about which of your personal data we process when you use the NFCtron account, whether the data is processed based on your consent or another legal basis, the purposes for which we use the data, and what rights you have concerning the processing of your personal data (hereinafter referred to as the "**Personal Data Processing Policy**").

### A. Who is the Data Controller?

The data controller is NFCtron a.s., with its registered office at Opletalova 1525/39, Nové Město, 110 00 Prague 1, Company Identification Number: 072 83 539, registered in the Commercial Register maintained by the Municipal Court in Prague, file mark B 25707;

The event organizer for the event you wish to attend (hereinafter referred to as the "**Organizer**") may also, in certain cases, be the data controller, particularly if the Organizer needs your personal data to a certain extent for organizing the event. In such cases, you will be informed before your personal data is provided to the Organizer. Before purchasing a ticket or credit, the event organizer will be identified, ensuring you know in advance who is responsible for the event and may act as the controller of your personal data. However, the Organizer typically does not process your personal data directly; instead, they receive all data anonymized from NFCtron, and NFCtron performs all processing on behalf of and for the account of the Organizer.

### B. From whom do we obtain personal data?

We generally obtain personal data directly from you, primarily through your registration, during which you enter your personal information directly into the NFCtron interface and when purchasing tickets or credit. In certain cases, you may be provided with the option to voluntarily submit additional personal data that is not necessary for registration or for purchasing tickets or credit. Such information will be processed exclusively for the purposes indicated at the point of data entry.

The account user may purchase tickets or credits for third parties using the NFCtron account. In such cases, the account user may be required to provide the personal information of the third party. The Company has no control over this personal information, which is provided solely by the user. The user is responsible for ensuring the accuracy of the third party's personal information and for obtaining the third party's consent before providing their data.

### C. What personal data do we process?

We process the following personal data:

1. identification data, which primarily includes your name, surname, date of birth, address, and other information used to identify you that you choose to provide;
2. contact data, which includes personal information that allows us to contact you, such as your email address, telephone number, delivery address, and billing address; and/or
3. data related to events you have attended in the past and the amount of credit you have charged.

Among the above-mentioned data, the following personal information is required for registration: name, surname, date of birth, address, email, and telephone number.

If you are provided with the option within the NFCtron account to submit any additional personal data beyond your name, surname, date of birth, address, email, and telephone number, it is done voluntarily by you, and such personal data is not required for access to the NFCtron account but may facilitate further cooperation with us.

### D. Why do we process personal data, and what authorizes us to do so?

1. As part of our operations, we process personal data for a range of purposes and to different extents, either:
  1. Without your consent, based on the fulfillment of a contract, our legitimate interest, or due to the fulfillment of a legal obligation (Article 6(1)(b), (c), and (d) of the GDPR); or
  2. Based on your consent.  
*/The specific processing activities that may be carried out without your consent depend on the purpose of the processing, your relationship with NFCtron, and the services you use. Data may also be processed if you are the recipient of a service ordered through NFCtron or if you engage in communication, solely for the purpose of facilitating that communication.*
2. If you create an NFCtron account with us
  1. Processing based on contract fulfillment:  
If you create an account as an individual, we process your personal identification and contact data for the purpose of preparing, concluding, and fulfilling any contracts with you. If you establish a user account with us, we may also use your settings – the personal data you enter in your profile – for this purpose. The use of this data for the preparation, conclusion, and fulfillment of a contract with you means that we will use it mainly to:
    1. enable you to use your NFCtron account to purchase tickets for events and credit;

2. communicate with you regarding NFCtron services, such as providing support, offering all functionalities, correcting your data, and ensuring the proper functioning of the entire service;
  3. offer you events within the application that may interest you;
  4. address any other requests you may have.
2. Processing based on legitimate interest:  
We may also process your data based on our legitimate interest. Such legitimate interests include, for example:
1. direct marketing, primarily offering our services to you as a customer:  
Given that we process certain data about you, especially regarding the events you have attended, we can offer you other events based on this data. For this purpose, we will also process the data mentioned in Section C (What personal data do we process?) of this Privacy Policy. If you do not agree with the processing of your personal data in this manner, you may object, and we will be obliged to cease such processing;
  2. the transfer of personal data within the group of companies for internal administrative purposes and supplier services.
  3. if you request our services, just as when you create a user account with us, we process your identification and contact data based on our legitimate interest (i.e., without your consent) for the same purposes and in the same manner as we process the data of registered users based on our legitimate interest (see Section D.2.1 of this Privacy Policy).
3. If you communicate with us through various channels:  
If you communicate with us through various channels, especially via email, chat tools, and social media, we will process your identification and contact data and records of the communication based on our legitimate interest (i.e., without your consent) for the purpose of:
- /For these purposes, personal data is retained for as long as necessary for the operation of the service and three years after its termination. You have the right to object to processing based on our legitimate interest./*
1. Handling your requests; if you have already created an account with us and we provide services to you, we may carry out this processing based on the fulfilment of a contract with you;
  2. keeping records of your requests to ensure they are fulfilled correctly and on time;
  3. demonstrating that we received and processed your request, such as when you place an order or submit a complaint through this channel.

4. If you give us your consent:

We may obtain your consent in various situations, such as when using certain supplementary services within your NFCtron account, during registration, or when logging in. Consents are obtained for various purposes. Depending on when we obtain your consent and, most importantly, the purpose for which it is given, the scope of processing we may carry out based on it will vary. The purpose will always be indicated for each consent so that you can review all relevant information before giving consent. All consents we obtain are entirely voluntary, and you are not obliged to provide them. You may withdraw your consent at [privacy@nfctron.com](mailto:privacy@nfctron.com). The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

## E. Who processes your personal data and to whom do we transfer it?

All the personal data mentioned above is processed by us as the controller. This means that we determine the purposes for which your personal data is collected, define the means of processing, and are responsible for its proper execution. We may also transfer your personal data to other entities that act as controllers, including:

- event Organizers for events in which you are interested, in connection with the fulfillment of a contract with you, but only if your personal data is required by the organizer for participation in the event;
- subsidiary Clash Ventures s.r.o., with its registered office at Opletalova 1525/39, Nové Město, 110 00 Prague 1, Company ID: 089 51 632, registered in the Commercial Register maintained by the Municipal Court in Prague, File No. C 328089, for purposes based on legitimate interest, specifically organizational and administrative cooperation;
- affiliate NFCtron Pay a.s., with its registered office at Opletalova 1525/39, Nové Město, 110 00 Prague 1, Company ID: 190 99 339, registered in the Commercial Register maintained by the Municipal Court in Prague, File No. B 27986, for the purpose of providing supplier services to NFCtron;
- entities or authorities authorized to request the disclosure of personal data in accordance with applicable legal regulations (e.g., the Police of the Czech Republic, regulatory authorities, etc.), as well as relevant state administration bodies, courts, and law enforcement authorities;
- specific individuals within NFCtron who require access to this data to perform their job duties;
- our contractually engaged service providers, such as IT service providers, website management, audit, accounting, legal, tax, and administrative services, but only to the extent necessary to fulfill the specific purposes of processing and based on the appropriate legal grounds for

processing personal data; and

- third parties to whom we may be obligated to disclose data based on legal obligations imposed on us.

A specific list of personal data recipients is available in the current version upon request via the email address provided below. We do not share your personal data with any entity located outside the EU or EEA without your explicit instruction and consent.

## **F. What rights do you have regarding the processing of your personal data?**

Just as we have rights and obligations when processing your personal data, you also have certain rights regarding the processing of your personal data. These rights include:

### Right of Access:

You have the right to know what data we process about you, for what purpose, for how long, where we obtain your personal data, to whom we transfer it, who else processes it besides us, and what other rights you have concerning the processing of your personal data. This document serves that purpose. As part of the right of access, you can request a copy of the processed personal data, with the first copy provided free of charge. Subsequent copies may incur a fee based on administrative costs, including the cost of the data carrier, other media, and delivery costs.

### Right to Rectification

If you find that the personal data we process about you is inaccurate or incomplete, you have the right to have it corrected or supplemented without undue delay.

### Right to Erasure

In certain cases, you have the right to have your personal data erased. We will erase your personal data without undue delay if one of the following reasons applies:

- your personal data is no longer necessary for the purposes for which we processed it;
- you withdraw your consent to the processing of personal data, where consent is required and there is no other reason for continuing to process the data;
- you exercise your right to object to processing (see below the section on the Right to Object to Processing) of personal data processed based on our legitimate interests, and we find that there are no longer any legitimate interests justifying the processing; or
- you believe that our processing of personal data is no longer in accordance with generally applicable laws.

However, this right does not apply if the processing of your personal data remains necessary for the fulfillment of our legal obligations or for the establishment, exercise, or defense of our legal claims (see Section D).

### Right to Restriction of Processing

In certain circumstances, you may, in addition to the right to erasure, exercise the right to restriction of processing. This right allows you, in specific situations, to request that your personal data be marked and that no further processing operations be carried out on these data—although, unlike the right to erasure, this restriction is temporary rather than permanent.

#### **We must restrict the processing of personal data when:**

- you dispute the accuracy of the personal data, while we determine which data is correct;
- we process your personal data without a sufficient legal basis (e.g., beyond what is necessary), but you prefer to restrict such data rather than have it erased (e.g., if you anticipate that you may provide such data to us in the future);
- we no longer require your personal data for the purposes specified above, but you need it for the establishment, exercise, or defense of legal claims; and/or
- you lodge an objection to the processing.

### Right to data portability

You have the right to obtain from us all of your personal data that you have provided to us, which we process based on your consent and in fulfilment of a contract (see Section D: Why We Process Personal Data and What Authorizes Us to Do So). We will provide your personal data to you in a structured, commonly used, and machine-readable format. To facilitate the transfer of your data upon request, this applies only to data that we process in an automated manner within our electronic databases.

### Right to object to processing

You have the right to object to the processing of your personal data when such processing is based on our legitimate interest (see Section D: Why we process personal data and what authorizes us to do so). If the objection relates to marketing activities, we will immediately cease processing your personal data for these purposes. In other cases, we will stop processing your data unless we have compelling legitimate grounds to continue such processing.

### Right to lodge a complaint

Exercising the rights mentioned above does not affect your right to lodge a complaint with the relevant supervisory authority. You may particularly exercise this right if you believe that we process your personal data unlawfully or in violation of applicable legal regulations. Complaints regarding our processing of personal data can be submitted to the Office for Personal Data Protection, located at Pplk. Sochora 27, 170 00 Prague 7 ([www.uoou.cz](http://www.uoou.cz)).

## **G. Data retention period**

We collect your personal data only for the period necessary to fulfill the purpose for which it was collected or for the duration of our legitimate interests. After this period, we may retain the data based on our legitimate interest for the purpose of protecting legal claims and for our internal records and audits (for instance, in the event of a legal dispute or outstanding payments between us and you), for a total period of four years—comprising three years of the statutory limitation period plus an additional year after its expiration to address claims made at the end of the limitation period. In the case of legal,

administrative, or other proceedings, we will process your personal data to the extent necessary for the duration of such proceedings and for the remaining portion of the limitation period following their conclusion. Our legitimate interests in this context include protecting legal claims and ensuring proper service provision.

Personal data retained based on your consent will be kept only until you withdraw your consent.

## **H. How to exercise your rights**

For any matters related to the processing of your personal data—whether it’s a query, exercising a right, filing a complaint, or any other issue—you can contact us directly through the interface provided in your NFCtron account or by emailing us at [privacy@nfctron.com](mailto:privacy@nfctron.com). We will process your request without undue delay, but no later than one month from the date of receipt, depending on the nature of the request. In exceptional cases, particularly if your request is complex, we may extend this period as necessary, but the extension will not exceed three months. If an extension is required, we will inform you of the delay and the reasons for it.