

DATA PROTECTION PRINCIPLES

The **EXCALIBUR Holding Ltd.** company, headquarters in Haštalská 1072/6, Prague 1, zip code 110 00, ID: 003 13 963, registered in the Commercial register maintained by the Municipal Court in Prague, Section B, Insert 375, mailing address Chvalovice – Hatě 182, zip code 669 02 (hereafter also as ‘We’) as a personal data administrator informs you as visitors of the Excalibur City shopping and entertainment centre and users of the www.excaliburcity.com website about the collection and other processing of personal data and the data protection principles, which are described below.

In these data protection principles, we explain:

- which data about you and the children we collect and for what reason,
- how we use this data,
- to whom and in what cases the data may be transmitted,
- for how long we process the data,
- what options we offer, including gaining access to the data and their updating, and what other rights you have.

We have appointed a **Personal Data Protection Officer** (hereinafter ‘Officer’). The Officer is Ondřej Ševčík, Chvalovice – Hatě, street number 182, zip code 669 02, tel. +420 724 724144, e-mail: ondrej.sevcik@excaliburcity.com. If you do not understand something or need further information about the processing of personal data, you can also contact us at info@excaliburcity.com at any time.

Why we collect and process the data

We collect the data and further work with them:

- to be able to contact you and provide you with the information you have requested,
- to be able to send you newsletters that contain commercial communications about news, events, and services, which we provide or people working in Excalibur City and which we think you might be interested in;
- to be able to use photographs or image and audio records, including capturing children for our promotion and the promotion of services provided in the Excalibur City shopping and entertainment centre, if you have given us permission or have entered into a contract with us;
- in order to protect and support our business;
- because we have a legitimate interest in documenting events that we organise and using the acquired photographs or image and audio records for our promotion and the promotion of the Excalibur City shopping and entertainment centre; or
- in order to meet our legal obligations.

The provision of data for the purposes of performance of the contract and the provision of data for the purposes of answering your inquiries or information requested by you represent our contractual requirement, in order to be able to conclude and fulfil a contract with you or to be able to contact you. The failure to provide data may result in the failure to conclude a contract or failure to provide answers to your questions.

The provision of identification and address personal data of the child is our requirement for your child's membership at **Merlin's Club**. The failure to provide the data may result in a refusal of Merlin's Club membership.

You may, at any time, revoke consent to the processing of your child's personal data for the purpose of Merlin's Club membership by sending a message about the withdrawal of consent to the merlinskindervelt@excaliburcity.com e-mail address. In such a case, we will secure the deletion of your child from Merlin's Club.

If you have requested the **sending of a newsletter**, you have given us permission to process your e-mail address. We use your data exactly in order to be able to send you newsletters that contain commercial communications about news, events, and services of the Excalibur City shopping and entertainment, which we think you might be interested in.

You may, at any time, revoke consent to the processing of personal data for the purpose of sending the newsletter by sending a message about the withdrawal of consent to the info@excaliburcity.com e-mail address, and we will no longer send you the newsletter.

If you have provided us with your zip code (postal code), we process it to evaluate our customers' catchment areas in order to support our business.

We generally document and take photographs of the participants or audio or image records (hereafter 'photographs and records') capturing the participants at events organised in the Merlin's Kinderwelt children's entertainment park and within Merlin's on the road. We place these photographs and records on the website relating to the organised event, such as www.excaliburcity.com and www.merlinskinderwelt.com on our user accounts and accounts set up for the given event on Czech and Austrian social networks, such as Facebook or Instagram. These photographs and records capture the course of the event, and we do not intend to process sensitive personal data (a special category of personal data) that can be captured on such photographs and records. On the websites relating to the organised event, we will not tag you or the children on the published photographs as particular participants. On social networks, such tagging of people may be possible, but it depends on your set up privacy protection as a user of such a network.

If you need further information, please contact the organiser on site, we will be happy to provide you with additional information and explanations.

Nevertheless, if you still do not want specific photographs or records, depicting you or your child at an event, to be published, let us know at info@excaliburcity.com and we will take the necessary actions.

Extent of personal data processing

We mainly process the following data:

- a) the name and surname of the child's legal guardian
- b) address of the child's legal guardian
- c) name and surname of the child
- d) date of birth of the child
- e) whether the child is a girl or a boy
- f) address of the child
- g) telephone contact
- h) e-mail address or
- i) capturing the physical form and expressions of a personal nature.

Who has access to your personal data and your child's personal data

We will process your and your child's personal data as an administrator. For the above-mentioned purposes, we can pass the processed personal data to our co-workers who are participating in our services and to subcontractors who provide services on our behalf. We make sure that these entities have an ensured duty of confidentiality. I.e., for example, our accountant, photographer, marketing campaign provider, etc.

As for the personal data captured on the photographs and records of the events organised by us, these are accessible to the users of the website relating to the organised event, such as www.excaliburcity.com and www.merlinskinderwelt.com and Czech and Austrian social networks, such as Facebook and Instagram.

Duration of personal data processing

We will process your personal data for a time period that is vitally necessary, that is namely:

- in the case of personal data provided via the contact form for a period of normally 6 months,
 - for as long as we provide you with our services or perform a mutual agreement and for legal protection reasons for another four years thereafter, or
 - in the case of photographs or records for promotion until the termination of Merlin's Kinderwelt, or until the withdrawal of consent,
 - in the case of photographs and records from organised events during our organisation of similar events, or
 - in the case of processing based on your consent (e.g. sending newsletters) until its un-subscription;
- this applies unless legal regulations require a longer period of time (e.g. in the case of meeting archiving obligations under current legal regulations, such as the Accounting Act, the Archiving and Evidence Act, or the Value Added Tax Act).

Personal Data Security

We handle your personal data and the personal data of your child responsibly and in accordance with Czech and European legal regulations. We use both automated but also manual means to process personal data.

We have adopted technical and organisational measures to prevent the misuse, damage, or destruction of personal data. At the same time, however, the fact that data transmission via the Internet is by nature not secure is true, and therefore, we cannot guarantee the 100% security of such sent data.

Your rights

In relation to our processing of personal data, you and your child may claim:

- a) **the right of access to personal data**, i.e., at any time, you can ask for our confirmation whether the personal data that concerns you or your child is processed or not and, if so, then for what purposes, to what extent, to whom they are accessible to, for how long we will process it, whether you have the right to a correction, deletion, limitation of processing, or to object, from where we have obtained the personal data, and whether your personal data or your child's personal data are processed for automated decision-making, including profiling;
- b) **the right to a correction**, i.e., at any time, you can ask us to make a correction or update to your personal data or the personal data of your child, if it was inaccurate or incomplete;
- c) **the right to deletion ('the right to be forgotten')**, i.e., we have to delete your personal data and the personal data of your child if (i) it is no longer necessary for the purposes for which it was collected or otherwise processed, (ii) the processing is illegal, (iii) you object to the processing and there are no overriding legitimate reasons for processing, or (iv) a legal obligation imposes so;
- d) **the right to limit the processing of data**, which means that until we resolve any disputable issues regarding the processing of your or your child's personal data, we must limit the processing of such personal data;
- e) **the right to object to processing**, if you object to processing for the purposes of direct marketing, we will no longer process your personal data or the personal data of your child for these purposes; if you object to processing in other cases of processing based on a legitimate interest, we will not process the personal data unless we substantiate a serious legitimate reason for the processing, which will prevail over the interests or rights and freedoms of you or your child as the data subjects or for the determination, performance or defence of legal claims;
- f) **the right of transferability**, i.e., at any time, you can request your personal data or the personal data of your child in a structured, commonly used, and machine-readable format, if we process it on the basis of a consent or contract, and we do it in an automated form; if it is technically feasible, we will pass such personal data directly to another designated administrator.

You can claim all your rights by contacting us according to your choice at the above delivery address or at info@excaliburcity.com or by contacting our authorised Officer.

If you feel that your personal data or your child's personal data is not processed correctly, you can contact your Supervisory Authority with your **complaint**, such as the Officer for Personal Data Protection (www.uoou.cz).

Processing of children's personal data

Our website www.excaliburcity.com is not intended for children under 16 years of age. We do not process personal data of children under 16 years of age in this regard. If you think a child has provided us with personal data, please contact us at info@excaliburcity.com and we will take the necessary measures.

Further processing

The Excalibur City shopping and entertainment centre, which consists of the Merlin's Kindewelt children's entertainment park, is monitored by a **camera system with recording** for the purposes of protecting the health and property of Us as an administrator and the monitored persons. For the sake of clarity, we do not disclose information regarding this processing of personal data, as these are primarily intended as information for users at www.excaliburcity.com. Information on the processing of personal data by the camera system is available with Us on site, at the Central Security Office – office building at Hatě, street number 182, 66902 Chvalovice.

Changes to the Privacy Policy

We will update this Privacy Policy at our discretion to reflect the changes in our procedures in terms of personal data processing. We thus recommend that you continuously check this Privacy Policy. The Privacy Policy is up to date as of the stated effective date. If you continue using our website as soon as the changes become effective, your continued use of our website means that you are aware of these changes.

These Data Protection Principles are effective from 25 May 2018.