

## PERSONAL DATA PROCESSING POLICY

FREEPORT LEISURE (CZECH REPUBLIC) s.r.o., comp. reg. no.: 264 29 101, with its registered office at Hatě 196, 669 02 Chvalovice, registered in the Commercial Register maintained by the Regional Court in Prague, File No. C 47035 (“FREEPORT”), protects all processed personal data as strictly confidential and handles them in accordance with the applicable legal regulations in the field of personal data protection. The security of your personal data is a priority for FREEPORT.

Within the meaning of Article 4(7) of the General Data Protection Regulation (EU) 2016/679 (“GDPR”), FREEPORT is the controller of your personal data, i.e. it determines the purposes and means of processing your personal data and collects, retains and uses (and otherwise processes) your personal data for the performance of its business activities (the individual purposes for which personal data are processed are further defined below).

Personal data processing policy applies to the processing of your personal data if you:

- have registered at <https://www.freeport.cz>, [www.freeoutlet.cz](http://www.freeoutlet.cz) or [www.freeoutlet.at](http://www.freeoutlet.at) operated by FREEPORT (the “Website”);
- have purchased on the Website;
- are in a business relationship with us as a business partner;
- have visited the Website;
- have contacted us by phone or email or via the form on the Website.

(hereinafter collectively referred to as “Data Subjects”).

### 1. CATEGORIES, PURPOSE AND LEGAL BASIS

1.1 The overview table below describes the purposes, categories and legal bases for the processing of Personal Data of Data Subjects:

Data subject	Categories of data	Purpose	Legal basis
Registrant	<b>Identification and contact details</b> (name, surname, e-mail, password)	Registration <i>The provision of data is necessary for the creation of a registration on a contractual basis</i>	Art. 6(1)(b) of the GDPR  (contract)
Buyer	<b>Identification and contact details</b> (name, surname, e-mail, telephone)  <b>Billing information</b> (street, house number, city, country + or, if applicable, company name, comp. reg. no., VAT no.) + other delivery address if applicable  <b>Transport and payment information</b>  <b>Order information</b> (goods)	Buying and selling goods  <i>The provision of data is necessary for the sale of goods</i>	Art. 6(1)(b) of the GDPR  (contract)

<b>Data subject</b>	<b>Categories of data</b>	<b>Purpose</b>	<b>Legal basis</b>
Buyer	<p><b>Identification data</b> (name, surname, e-mail, telephone)</p> <p><b>Billing information</b> (street, house number, city, country + or, if applicable, company name, comp. reg. no., VAT no.) + other delivery address if applicable</p> <p><b>Transport and payment information</b></p> <p><b>Order information</b> (goods)</p>	<p>Compliance with legal obligations (tax and accounting)</p> <hr/> <p><i>Data processing is a legal obligation</i></p>	<p>Art. 6(1)(c) of the GDPR (legal obligation)</p>
Business partner (managing directors)	<p><b>The information specified in the contract with the business partner</b></p>	<p>Fulfilling contractual and legal obligations</p> <hr/> <p><i>The provision of data is necessary for mutual cooperation</i></p>	<p>Art. 6(1)(b) and (c) of the GDPR (legal obligation)</p>
Business partner (staff)	<p><b>Contact details</b> provided in the contract with the business partner or given during the meeting by e-mail, telephone</p>	<p>Mutual communication between the Contracting Parties</p> <hr/> <p><i>The provision of data is necessary for mutual cooperation</i></p>	<p>Art. 6(1)(f) of the GDPR (legitimate interest)</p>
Buyer	<p><b>Contact details</b> Name, surname, e-mail, telephone</p>	<p>Sending special offers and news</p> <hr/> <p><i>If the buyer has agreed, marketing newsletters are sent to the buyer</i></p>	<p>Art. 6(1)(a) of the GDPR (consent)  in conjunction with Section 7(2) of Act No. 480/2004 Coll.</p>
Website User	<p><b>Cookies</b></p>	<p>Website operation</p> <hr/> <p><i>Technical cookies are necessary for the operation of the Website. Consent to other types of cookies is voluntary</i></p>	<p>Art. 6(1)(f) or (a) of the GDPR (legitimate interest and/or consent)</p>
Data subjects	<p><b>Identification and contact details</b> (name and surname, address, if applicable, registered office and comp. reg. no., e-mail, telephone, order number and other data provided)</p>	<p>Dealing with an incentive or request or complaint</p> <hr/> <p><i>In order to process the request (properly and timely), it is necessary to process personal data</i></p>	<p>Art. 6(1)(f) of the GDPR (legitimate interest)</p>

<b>Data subject</b>	<b>Categories of data</b>	<b>Purpose</b>	<b>Legal basis</b>
Data subjects	<b>Anonymous data</b>	Keeping statistical reports <i>Data cannot be attributed to Data Subjects</i>	Art. 5(1)(e) of the GDPR

## 2. RETENTION PERIOD

2.1 FREEPORT retains your personal data for the period necessary to ensure all rights and obligations arising from the relevant contractual relationship and for the period for which it is required to retain personal data under generally binding legal regulations. In other cases, the processing period is based on the purpose of the processing, which must be proportionate or is determined by data protection legislation or other regulatory provisions.

2.2 The overview table below describes the retention period of your personal data:

<b>Data subject</b>	<b>Categories of data</b> <i>Purpose</i>	<b>Retention period</b>
Registrant	<b>Identification and contact details</b> (name, surname, e-mail, password) <i>Registration</i>	The data will be deleted upon the request for cancellation of registration.
Buyer	<b>Identification and contact details</b> (name, surname, e-mail, telephone) <b>Billing information</b> (street, house number, city, country + or, if applicable, company name, comp. reg. no., VAT ID) + other delivery address if applicable <b>Transport and payment information</b> <b>Order information (goods)</b> <i>Buying and selling goods / Fulfilling legal obligations</i>	For a period of 10 years from the end of the tax year in which the performance took place.
Business partner (managing directors)	<b>Details specified in the contract with the business partner</b> <i>Contractual and legal obligations</i>	For a period of 10 years from the termination of the contractual relationship.
Business partner (staff)	<b>Contact details</b> <i>Mutual communication</i>	Until the new contact details are notified, or if they are part of the contract, then for a period of 10 years from the termination of the contractual relationship, unless the Data Subject objects and provided that the objection can be met.
Buyer	<b>Identification and contact details</b> (name and surname, e-mail, telephone) <i>Sending promotional offers and news</i>	During the period of consent.

User of the Website	<p style="text-align: center;"><b>Cookies</b></p> <p style="text-align: center;"><i>Website operation</i></p> <p style="text-align: center;">The cookie policy is available here.</p>	According to the expiry date of the cookies listed in the [cookie banner overview table / cookie policy].
Data subjects	<p style="text-align: center;"><b>Identification and contact details</b></p> <p style="text-align: center;">(name and surname, address, address, if applicable registered office and comp. reg. no., e-mail, telephone, or order number and other data provided)</p> <p style="text-align: center;"><i>Handling an incentive/complaint</i></p>	For a period of 6 months to 3 years, depending on the request being processed.

### 3. RECIPIENTS OF PERSONAL DATA

- 3.1 At FREEPORT, your personal data is only disclosed to authorised employees or individual personal data processors contracted by FREEPORT or other data controllers. This includes, for example, processors or administrators involved in the implementation of services, payments, or providing marketing services, or vendors placing an offer of goods on the Website. However, only to the extent necessary for the performance of the individual purposes of processing and on the basis of the corresponding legal title for the personal data processing. The current list of FREEPORT's recipients of personal data is available on request by e-mail at [informace@freepport.cz](mailto:informace@freepport.cz).
- 3.2 FREEPORT is entitled, or required, to transfer certain personal data to for example law enforcement authorities or other public authorities in cases provided for by law and under applicable legal regulations.
- 3.3 FREEPORT does not transfer your personal data to a third country (a country outside the EU/EEA) or an international organisation.

### 4. RIGHTS OF DATA SUBJECTS

- 4.1 In connection with the processing of personal data, the Data Subject is entitled to the following rights:
- **Right to withdraw the consent** to the processing of personal data: if personal data are processed on the basis of consent, you can withdraw your consent at any time. Withdrawal of the consent does not affect the lawfulness of processing based on the consent given before its withdrawal.  
  
Consent to send commercial communications can be revoked via the link provided in the footer of the e-mail message that is a commercial communication.
  - **Right of access to personal data:** you have the right to obtain information about whether your personal data is being processed and, if so, the right to access your personal data.
  - **The right to rectification of inaccurate or incomplete personal data:** if you believe that we are processing inaccurate or false, outdated or incomplete personal data, you have the right (and in certain cases the obligation) to request their rectification or completion. We will carry out the correction/completion without undue delay, taking into account technical possibilities.
  - **Right to erasure:** if you request erasure, we will erase your personal data if (i) they are no longer necessary for the purposes for which they were collected or otherwise processed, (ii) the processing is unlawful, (iii) you have objected to the processing and there are no prevailing legitimate grounds for the processing, or (iv) the processing is not required by law.
  - **Right to restriction of the processing:** if you are not interested in erasure but only in temporary restriction of the processing of your personal data, you can request us to restrict the processing of your personal data.
  - **Right to data portability:** if you want us to transfer your personal data that we process on the basis of consent or on the basis of a contract to a third party, you can exercise your right to

data portability. If exercising this right could adversely affect the rights and freedoms of third parties, we will not be able to comply with this request.

- **Right to object:** you have the right to object to the processing of your personal data that are processed for the purposes of protecting our legitimate interests or those of third parties. If we do not prove that there is a compelling legitimate reason for the processing that prevails over your interests or rights and freedoms, we will terminate the processing without undue delay on the basis of the objection.
  - The **right to contact the Office for Personal Data Protection** ([www.uoou.cz](http://www.uoou.cz)).
- 4.2 When processing your personal data or browsing the Website, there is no automated decision-making or profiling pursuant to Art. 22 of the GDPR.
  - 4.3 In the event of repeated or manifestly unjustified requests to exercise the above rights, we are, in accordance with Art. 12(5)(a) of GDPR, entitled to charge a reasonable fee for the exercise of the right or to refuse to exercise the right. We will inform you in advance of such a step.
  - 4.4 To exercise your rights, please contact us by letter to FREEPORT's registered office or by e-mail to [informace@freepport.cz](mailto:informace@freepport.cz). FREEPORT reserves the right to reasonably verify the identity of the applicant for the rights in question.

## 5. UPDATE

- 5.1 The Personal Data Processing Policy may be updated, in particular if the scope, purpose or legal basis of the processing changes. The valid and updated personal data processing policy is always available on the Website.
- 5.2 The personal data processing policy became valid on 8 February 2021.
- 5.3 Last update 15.7.023.