

# Privacy Policy

## 1. Basic provisions

1.1. The administrator of personal data pursuant to Article 4 (7) of regulation of the European Parliament and of the EU Council 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as "GDPR") shall be ADONAI for People o.p.s, with its registered office at Kodícilova 258/6, 108 00 Prague 10 - Malešice, identification number: 026 59 506, entered in the Commercial Register kept by the Municipal Court in Prague, Section O, Insert 1400 (hereinafter referred to as the "Administrator").

1.2. Personal data means any information relating to an identified or identifiable natural person; an identifiable natural person is a natural person who can be identified, directly or indirectly, by reference to a specific identifier, such as name, identification number, location data, network identifier or one or more specific traits of physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

## 2. Sources and categories of personal data processed

2.1. The administrator processes the personal data that one has provided to him or the personal data that the administrator has obtained based on the order fulfillment.

2.2. The administrator processes basic identification data (name, surname), contact data (e-mail), data on the course of the purchase, the history of the visits of [www.afilmteensfest.com](http://www.afilmteensfest.com) website (hereinafter the "website"), the history of activities in the e-mail correspondence.

## 3. Legal reason and purpose of processing personal data

3.1. The legal reason for processing personal data stems from the necessity for: fulfillment of a legal obligation, preparation and fulfillment of a contract and the purposes of the legitimate interests of the administrator based on repeatable, informed, unambiguous and free consent.

3.2. The purpose of personal data processing is:

- execution of your order and exercise of rights and obligations arising from the contract between you and the administrator; when ordering, personal data are required which is necessary for a successful execution of the order (name and address, contact), provision of personal data is a necessary requirement for concluding and fulfilling the contract, without providing personal data it is not possible to conclude or fulfill it by the administrator;
- analysis of data on the behavior of website visitors, finding out the preferences of website visitors; testing new functions and applications to improve services as well as to improve web content and to get protected against ICT infrastructure attacks;
- sending business messages and executing other marketing activities.

## 4. E-mail business communication

4.1. You may be the addressee of information, offers and updates related to the provider or to products (blocks of films) provided by the provider, being sent on behalf of the provider to the user's e-mail address. This e-mail business/sales communications are not unsolicited commercial communications. The administrator (provider) sends them out due to a legitimate interest.

4.2. Upon consent, the administrator sends e-mail business messages to potential customers. E-mail business messages that are not related to the products offered (movie blocks) are being sent out by the administrator to customers solely with their consent.

4.3. The e-mail business messages are being sent out both based on legitimate interest and based on consent, it can be unsubscribed from at any time via the unsubscribe link located in the e-mail business communication or by adjusting the settings in the user account on the website. If you use multiple user accounts with different e-mail addresses, for technical reasons you will be unsubscribed from receiving e-mail business messages for each e-mail address separately. If you request the administrator to unsubscribe you from business messages in other way than those described above, the administrator may require identification and verification documents in order to confirm the request is made by an authorized person.

## **5. Cookies**

5.1. The webmaster stores short-term or long-term small text cookies in the browser or device of the web visitor, or they contain image transparent pixel tags and similar technologies for collecting data from browsers and devices of the web visitor (hereinafter "cookies").

5.2. The necessary functional cookies of the administrator ensure for instance, the possibility of logging in and registering a user account. This data is processed by the administrator out of necessity for the fulfillment of the purchase contract and out of the legitimate interest to ensure the functionality of the product offer and the potential purchase.

5.3. Subscription of business messages being sent out based on both legitimate interest and consent, can be canceled at any time through the unsubscribe link located in the e-mail business communication or by adjusting the settings in the user's account on the website. If you use multiple user accounts with different e-mail addresses, for technical reasons, you will be unsubscribed from receiving e-mail business messages for each e-mail address separately. If you request the administrator to be unsubscribed from e-mail business communications in other than those ways described above, the administrator may require identification and verification documents to confirm the request is being made by an authorized person.

5.4. Not necessarily functional cookies of the administrator evaluate number of visits and enable to improve the function of the website, remember the language and other user settings. The administrator uses web analytics tools, especially Google Analytics, to optimize the site, create user profiles, and improve his services. The data obtained from the analytical cookies used by these tools are anonymized. This data is processed by the administrator for the purpose of legitimate interest.

5.5. Once the administrator's functional cookies are turned off, the website visitor cannot take full advantage of its functionalities. When analytical cookies are turned off, the website visitor loses the possibility of customizing the offer. The website visitor agrees to the transfer of data from remarketing cookies to advertising and social networks by setting the browser. It as well affects the function of other cookies by setting the browser.

## **6. Data retention period**

6.1. The data obtained from cookies is processed by the administrator solely for the necessary time, maximum 2 years.

6.2. The administrator stores the following data:

- necessary for the preparation and performance of the contract and personal data on lifestyle and demographics obtained optionally from the personal life subject in connection with the preparation and performance of the contract (processed on the basis of a legitimate interest) for 5 years from the issue date of the last tax document or certificate relating to the contract ( reservation, order, purchase), or more precisely 5 years from the date of the user account cancellation or similar registration of the customer;

- processed by the administrator for the fulfillment of obligations imposed by law, especially contracts, invoices and other accounting and tax documents with identification and contact data (the administrator keeps them for a period of 10 years, unless otherwise stipulated by the relevant legislation);

- used based on consent (the administrator keeps them for a period of 10 years) or until the revocation of consent.

6.3. If judicial, criminal, administrative or other similar proceedings are instituted before the expiry of any of the above time limits, the administrator shall process personal data for the entire duration time of such proceedings and the remainder of the limitation period after their termination.

6.4. After the retention period of personal data, the administrator deletes the personal data.

## **7. Recipients of personal data (subcontractors of administrator)**

7.1. Recipients of personal data are individuals involved in the product delivery and the execution of payments based on a contract providing marketing services.

7.2. The administrator does not intend to transfer personal data to a third country (to a non-EU country) or to an international organization.

## **8. Your rights**

8.1. Under the conditions set in the GDPR, you have the right to:

- access your personal data pursuant to Article 15 of the GDPR;
- correction of personal data pursuant to Article 16 of the GDPR, or restrictions on processing pursuant to Article 18 of the GDPR;
- deletion of personal data pursuant to Article 17 of the GDPR;
- data portability according to Article 20 of the GDPR;
- revoke the consent to processing in a written form or electronically on e-mail: info@afilmteensfest.com, after revoking the consent, your data will be deleted;
- raise an objection against processing pursuant to Article 21 of the GDPR.

8.2. You as well have the right to file a complaint with the Office for Personal Data Protection in case you do believe your right to personal data protection has been violated.

## **9. Conditions of personal data security**

9.1. The administrator declares it has taken all appropriate technical and organizational measures to secure personal data.

9.2. The administrator has taken appropriate technical measures to secure data repositories and repositories of personal data in paper form.

9.2. The administrator declares solely persons authorized by him have access to personal data.

## **10. Final provisions**

10.1. These principles are drawn up in Czech and English language. In case of discrepancy between the language versions, the Czech version shall prevail.

10.2. The administrator reserves the right to change these policy principles at any time.

10.3. These principles are valid and effective from October 31, 2021.