

# PRIVACY POLICY

## Who collects my personal data?

We are a Czech trading company **Happenee s.r.o.**, registration number: 042 16 202, with registered office at Baštyřská 142, Hostavice, 198 00 Prague 9, Czech Republic (hereinafter referred to as "**Happenee s.r.o.**").

Our company is responsible for the operation and development of the platform called Happenee (hereinafter also referred to as "**Platform**"), which is used, among other things, to organize events and event, marketing and HR solutions (see Terms of Use of the Platform).

## Why should I read this document?

You may have heard of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the "**Regulation**"), more commonly known as the GDPR.

Articles 13 and 14 of the Regulation require us to provide our users and other affected parties with information about the collection, handling, protection and processing of their personal data.

Therefore, you can read more information in this Privacy Policy regarding the personal data we collect when you use the Platform.

## What personal data is processed?

### User account

We may process the following categories of personal data provided during registration and subsequent use of the Platform:

- Information about your person that you provided during registration or later as part of your user account settings (name and surname; telephone number; email address; password, etc.);
- Information about the device used to access the Platform (including but not limited to IP address).

The personal data listed in the preceding paragraphs are editable and can (and, according to the Terms of Use of the Platform, must) be updated by you if they change.

If any of this information is considered personal data, we, as data controller, will collect, store and/or process this personal data.

### Customer support

We may provide support to our users regarding the Platform. In order to provide support to you, in some cases we may need to use information obtained from you in the course of providing support (for example, your contact details, etc.).

Allows users to report illegal content and other violations of the Terms of Use of the Platform. In order to investigate

any such reports, in some cases we may need to use information obtained from you in the course of dealing with the report (such as your contact information, etc.).

If any of this information is considered personal data, as data controller we will collect, store and/or process this personal data.

### Use of the Platform

We may process the following categories of personal data provided when using the Platform, either directly by you or by third parties:

- Information about your person that you or someone else has filled in as part of events and solutions organised within the Platform.

We process this personal data as a processor for the organiser of the event or solution in question, who is the controller in this case. It is therefore essential that you always familiarise yourself with the data protection policy of the controller, as the controller determines the purpose and means of processing the personal data in question.

**This policy therefore does not apply to the processing of the personal data in question.**

### Personal data collected when subscribing to our newsletter (commercial communications)

On the website, you can subscribe to our newsletter by entering your name and email address and clicking on the "Subscribe" box. If you subscribe to our newsletter, we will keep you regularly informed of news about our products and services.

As data controller, we collect, store and process the names and email addresses of users who subscribe to our newsletter.

### Cookies

We use various "cookies" on our website. Some of these may be used to collect personal information from our customers. Please see the dedicated section of this Privacy Policy for more information.

## Why is my personal data processed?

We process your personal data primarily to provide you with Platform services, including the provision of support.

We will also process your personal data in order to comply with other obligations under the Terms of Use of the Platform and applicable law and to protect our own rights thereunder.

It is also in our legitimate interest to process this personal data for the purpose of asserting or potentially defending legal claims, as we would not otherwise be able to exercise

our rights. Such use of personal data is foreseeable for data subjects and does not constitute any, or only a minor, restriction on their interests, rights and freedoms.

In order to comply with the legal requirements, we must mention that we process this personal data in particular on the basis of Article 6(1)(b), (c) and (f) of the Regulation.

#### Personal data collected when subscribing to our newsletter (commercial communications)

As mentioned above, we collect, store and process this personal data because you have subscribed to our newsletter. We therefore process your e-mail for the purpose of sending you newsletters. In order to comply with the legal requirements, we must state that we collect, store and process this personal data in accordance with Article 6(1)(a) of the Regulation.

This means that you have given us your consent to process your personal data for the purpose of commercial communications. In order to demonstrate that you have given us your consent to send you our newsletter (and to process your personal data for the purposes of commercial communications), we may collect and store information that you have given us this consent (e.g. logs). We collect and store this data on the basis of Article 6(1)(f) of the Regulation. This means that it is in our legitimate interest to collect, store and process this personal data.

If you change your mind and no longer wish to receive the newsletter, you can unsubscribe at any time free of charge. We will always indicate how to unsubscribe within the newsletter.

#### **How long is my personal data processed?**

We only process your personal data for as long as is necessary to fulfil the above purposes of processing it, for the period to which you have consented, or for as long as is either necessary to comply with our obligations under applicable law, or as required by or in accordance with applicable law. We comply with mandatory data archiving rules.

#### To be specific:

The data obtained during registration and use of the Platform will be processed for the duration of the user account and until the expiration of the statute of limitations for all counterclaims arising from the Terms of Use of the Platform.

Data obtained in the context of the support and breach reporting procedures will be processed until the termination of the provision of support or the resolution of the specific report and until the expiry of the limitation periods for the initiation of any legal proceedings in connection with the aforementioned procedures.

#### Personal data collected when subscribing to our newsletter (commercial communications)

We will process and store this personal data until you unsubscribe from our newsletter. We will process and store the data you have provided as consent (e.g. logs) to receive the newsletter for the duration of that consent and for the period after that consent is given that is either necessary for us to comply with our obligations under the applicable laws, or for which you or any third party may argue that we have breached any of our obligations or violated applicable law in connection with the commercial communications we send you.

#### **Who will have access to my personal data?**

We care about the security of your personal data and therefore choose the partners to whom we entrust your personal data very carefully.

All our partners must be able to ensure that your personal data is sufficiently secure to prevent unauthorised or accidental access or other misuse, and all our partners must be committed to confidentiality and must not use your personal data for any purpose other than that for which it was provided to them.

Partners who may have access to your personal and user account information are:

- Technology service providers, including data storage providers;
- persons who ensure the security and error-free nature of our services and who regularly test that security and error-free nature;
- providers of accounting, legal and administrative services;
- persons who carry out professional activities for us or our contractual partners consisting of providing customer care and advice and informing customers about the features available on the platform;
- our employees;
- Platform event and solution organisers and participants to the extent that you make this information available to them as part of your user account settings;
- payment gateway operators in the case of ticket purchases via a payment gateway.

Our aim is and always will be to ensure that your personal data is as anonymous as possible and inaccessible to all third parties. However, please note that in certain circumstances we may be required to disclose certain personal data to public authorities in accordance with applicable law.

#### **Do you transfer personal data outside the EU/EEA?**

When processing personal data, we may sometimes use data processors who transfer your personal data to third

countries (especially to the United States of America) for the purpose of sending the Newsletter and for the purpose of managing cookies. In such cases, we always ensure that such transfers comply with the Regulation.

In particular, we note that personal data may be transferred to the United States of America, in which case the transfer is in accordance with the rules of the Standard Contractual Clauses (SCC).

### **How is my personal data protected?**

All your personal data is secured by standard procedures and technologies. We protect against unauthorized or accidental access, alteration, destruction, loss, unauthorized transfer or other unauthorized processing, as well as other misuse of records containing personal data.

Standard practices and technologies may include, but are not limited to, the following:

- Education and training of relevant employees and others who may come into contact with information about you and your user account in accordance with this Policy to ensure that they are aware of our privacy obligations when handling personal information;
- administrative and technical rules to restrict access to personal information on a need-to-know basis only;
- technological security measures, including firewalls, encryption and anti-virus software;
- physical security measures, such as employee security badges for access to our premises.

We cannot guarantee the security of your personal data without your help and responsible behaviour. Therefore, we ask you to help us ensure the security of your data by keeping your PIN secret (if set) and your device safe by following normal security standards.

### **Cookies**

#### Do you use cookies?

We use cookies on our website to analyse traffic and to personalise content and ads.

As a data controller, we collect, store and process any information that is considered personal data collected by these cookies (personal data may include your IP address, information about your activity on our Website, information about your advertising preferences, etc.).

To comply with legal requirements, we must mention that we collect, store and process this personal data primarily pursuant to Article 6(1)(f) of the Regulation.

This means that it is in our legitimate interest to collect, store and process this personal data for marketing purposes and for website traffic analysis, as

- this enables us to improve our products and services and to provide you with personalised content and advertising,
- some cookies also enable us to secure our website from various attacks and some cookies enable our website to function properly,
- we do not attempt to identify you using this personal information,
- there is little or no restriction on your interests, rights and freedoms; and
- you can permanently delete stored cookies at any time and change your cookie settings to disable or restrict the storage of new cookies.

We will process and retain such personal data for as long as necessary to analyse traffic and to provide any personalised content to you, and for such further period after that date as is either necessary to comply with our obligations under or as provided for by or in accordance with applicable law.

### **What rights do I have in relation to data protection?**

In particular, you have the following rights in relation to personal data:

- the right to withdraw your consent to the processing of your personal data at any time;
- the right to rectification or completion of your personal data;
- the right to request restriction of the processing of your personal data;
- the right to object to or complain about the processing of your personal data in certain circumstances;
- the right to request the transfer of your personal data;
- the right to access your personal data;
- the right to be informed of a personal data breach in certain circumstances;
- the right to request the erasure of your personal data in certain circumstances (right to be forgotten); and
- other rights set out in Act No. 110/2019 Coll., on the processing of personal data (Data Protection Act) and the Regulation.

For reasons relating to your particular situation, you have the right to object at any time to the processing of your personal data based on Article 6(1)(f) of the Regulation (i.e. that we have a legitimate interest in processing the personal data). You also have the right to object to the processing of your personal data for direct marketing purposes.

You also have the right, in the event of a breach of the obligations set out in the Regulation, to contact the Office for Personal Data Protection with a request to take corrective action at the Office for Personal Data Protection,

Pplk. Sochorova 27, 170 00 Prague 7, Czech Republic,  
telephone number +420 234 665 111 (switchboard).

### **How can I contact you?**

If you have any questions regarding these Privacy Policy, please feel free to contact us using the contact details below:

- Contact Address: Baštýřská 142, Hostavice, 198 00 Prague 9, Czech Republic.
- Contact Form:  
<https://en.happenee.com/contact/contact-us>
- Email Address: [info@happenee.com](mailto:info@happenee.com)

### **When do these Privacy Policy take effect?**

These Privacy Policy take effect as of September 22, 2024.

We reserve the right to change and update these Privacy Policy at any time. In case of any changes or additions, we will ask you to consent to the updated content before continuing to use the Platform..

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