

## PERSONAL DATA PROTECTION RULES

The purpose of this document is to provide you with information about personal data processing in the company CAMVISION s.r.o. and about your rights related to your personal data and their processing.

The processing of personal data is being conducted in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as the "GDPR").

These Personal Data Protection Rules (hereinafter referred to as the "Rules") will be updated by the CAMVISION s.r.o. if necessary. The current updated version of the Personal Data Protection Rules will always be available at the websites [app.panoris.com](http://app.panoris.com), [control.panoris.com](http://control.panoris.com) or [www.panoris.com](http://www.panoris.com) and at the register office of the company CAMVISION s.r.o. If a significant change occurs in these Rules in regard to the manners of handling of personal data, we will inform you about it on the websites [app.panoris.com](http://app.panoris.com), [control.panoris.com](http://control.panoris.com) or [www.panoris.com](http://www.panoris.com).

Due to the nature of provided services, CAMVISION s.r.o. performs both in positions of personal data controller as well as personal data processor.

### IDENTIFICATION DATA

**CAMVISION s.r.o.**, identification number (IČ) 27820050, with registered office at Zadrná 424/13, Bohunice, 625 00 Brno, a company registered in the Commercial Register with the Regional Court in Brno, section C, file 69494 (hereinafter also referred to as „CAMVISION“).

Contact e-mail: [info@panoris.com](mailto:info@panoris.com).

CAMVISION has not appointed a data protection officer, since it does not fit within the obligation set out in Art. 37 of the GDPR.

### CAMVISION AS PERSONAL DATA CONTROLLER

The CAMVISION acts in the position of a personal data controller particularly in relation to the personal data of customers and of natural persons that visit the website [app.panoris.com](http://app.panoris.com), [control.panoris.com](http://control.panoris.com) or [www.panoris.com](http://www.panoris.com).

**Purpose of processing:** For the purpose of fulfilling an agreement (registration to the application, communication) or fulfilling legal obligations (invoicing), the CAMVISION processes: name, surname, business name, identification number, residence/registered address, telephone, email.

The CAMVISION also processes data that it obtains from the customers and from other natural persons through their visit to the websites [app.panoris.com](http://app.panoris.com), [control.panoris.com](http://control.panoris.com) or [www.panoris.com](http://www.panoris.com): IP address, or other online identifiers.

If the CAMVISION intends to process other personal data than as stated in this article, or for other purposes, it can do so only on the basis of a validly granted consent to the processing of personal data.

**Duration of data processing:** The personal data are processed by the CAMVISION for the duration of the contractual relationship and subsequently for a maximum period of 1 year from the termination of the contractual relationship. Personal data being processed in order to fulfill obligations arising from special legal regulations are processed by the CAMVISION for the duration of time as set out in such legal regulations. If it is necessary to use the personal data for the protection of the CAMVISION's legitimate interests, the CAMVISION processes these for the duration of time necessary in order to exercise such rights.

## CAMVISION AS PERSONAL DATA PROCESSOR

The CAMVISION provides its partners with data space for the purposes of storing data operated within the scope of the service Panoris. The partner's data may also include personal data of natural persons. **In relation to the personal data that the partners or their customers store on the CAMVISION's servers, or within a hosting center, the CAMVISION acts in the position of a personal data processor. The controller of such personal data is the CAMVISION's partner.**

The CAMVISION is not liable for personal data protection principles or security procedures used by the partner, which may differ from these Personal Data Protection Rules.

**Purpose of processing and handling of data:** The CAMVISION does not carry out any operations upon the partners' data and data of their customers and in particular, it does not interfere in them, does not modify them, does not disclose or transfer them to third parties unless the contracting parties agree otherwise.

**Type of personal data being processed:** Name, surname and contact information such as e-mail, video recordings of people. The CAMVISION does not process personal data pertaining to judgments in criminal matters and criminal acts. The CAMVISION does not process any personal data of a special category according to Art. 9 of the GDPR

**Categories of data subjects whose personal data will be processed:** Natural persons, which will be recorded on video in relation with sports matches, customers of the service PANORIS.

**Duration of processing of personal data:** The CAMVISION processes personal data for the duration of the Agreement. After the elapse of 30 days from the termination of the Agreement, the CAMVISION will erase (delete) all of the customers' data stored on the CAMVISION's servers unless the contracting parties agree otherwise.

## RECIPIENTS OF PERSONAL DATA

The CAMVISION does not transfer personal data to any other controllers.

Processors of personal data are:

Area of cooperation	Processor Identification
<b>Google</b> Emailing: Incoming and outgoing communication	Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland.
<b>FlowUp</b> Programming and development of the website	FlowUp s.r.o., IČO 04712676, Purkyňova 649/127, Medlánky, 612 00 Brno
<b>Tomáš Winkler</b> Application development	Tomáš Winkler, IČO 6141129, Vinařického 3552/9, Brno 615 00
<b>AWS Amazon</b> Servers	Amazon.com, Inc., P.O. Box 81226, Seattle, WA 98108-1226
<b>Marta Buršíková</b> accountancy	Marta Buršíková, daňový poradce č. 3112, Dvořákova 2881/77, 750 02 Přerov

Processing of personal data may be conducted for the CAMVISION by processors exclusively on the basis of a personal data processing agreement, i.e. with guarantees of the organizational and technical security of such data with a definition of the purpose of processing, whereby processors cannot use the data for other purposes.

Personal data may under certain conditions be disclosed to government authorities or the CAMVISION may disclose them directly to other entities within the scope as set out in a special law.

CAMVISION does not have intention to transfer personal data to third countries or to international organizations within the meaning of Art. 44 and following of the GDPR. In the case that Amazon's servers would be located outside the European Union, the processor will ensure an adequate protection under the GDPR rules (<https://aws.amazon.com/compliance/gdpr-center/>).

## **TECHNICAL SECURITY OF DATA**

For the purpose of the security of the data the CAMVISION applies reasonable and appropriate technical and organizational measures that are continuously updated. For the purpose of maximum protection, the CAMVISION uses encryption. Organizational measures are a set of rules of behavior for the CAMVISION's employees and are a part of the CAMVISION's internal rules, and are considered by the CAMVISION to be confidential on grounds of security. If the CAMVISION's servers are located in a data center operated by a third party, the CAMVISION takes care to ensure that the technical and organizational measures are implemented within such a CAMVISION as well.

The CAMVISION places all data only on servers located within the European Union or in countries ensuring personal data protection in a manner equivalent to the protection ensured by the legal regulations of the Czech Republic.

## **RIGHTS OF DATA SUBJECTS**

### **The right to access to personal data**

The data subject has the right to obtain a confirmation from the CAMVISION as to whether personal data pertaining to the data subject are or are not being processed, and if so, the data subject has the right to obtain access to such personal data and to the following information: a) the purpose of processing; b) the category of affected personal data; c) the recipients to which personal data have been or will be disclosed; d) the planned time period for which personal data will be stored; e) the existence of the right to require the correction or erasure of personal data from the controller or a restriction of the processing thereof, or to raise an objection to such processing; f) the right to lodge a complaint with supervisory authority; g) all available information on the source of the personal data, if they are not obtained from the data subject; h) the fact that automated decision-making is occurring, including profiling. The data subject also has the right to obtain a copy of the personal data being processed.

### **The right to the correction of personal data**

The data subject has the right for the CAMVISION to correct inaccurate personal data pertaining to the data subject without undue delay, or to supplement incomplete personal data.

### **The right to the erasure of personal data**

The data subject has the right for the CAMVISION to erase the data subject's personal data pertaining to him/her without undue delay, in the event that: a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed; b) the data subject withdraws the consent on the basis of which the data were processed, and there is no other legal reason for processing; c) the data subject raises objections to processing and there are no overriding legitimate reasons for processing; d) the personal data were processed unlawfully; e) the personal data must be erased in order to fulfill a legal obligation set out within the law of the Union or of the Czech Republic; f) the personal data were collected in connection with an offer of information society services. The right to erasure shall not apply if the processing is necessary in order to fulfill legal obligations, for the establishment, exercise or defense of legal claims, and in other cases as set out within the GDPR.

### **The right to the restriction of processing**

The data subject has the right for the CAMVISION to restrict processing, in any of the following cases: a) the data subject contests the accuracy of the personal data, for the time necessary for the CAMVISION to verify the accuracy of the personal data; b) processing is unlawful and the data subject opposes the erasure of the personal data and, instead, requests a restriction of their use; c) the

CAMVISION no longer needs the personal data for the purposes of processing, but the data subject requires them for the establishment, exercise or defense of legal claims; d) the data subject has raised an objection to processing, until it is verified whether the CAMVISION's legitimate reasons override the legitimate reasons of the data subject.

#### **The right to object to processing**

The data subject has, on grounds pertaining to the data subject's specific situation, the right to raise an objection at any time to the processing of personal data pertaining to him/her and which the CAMVISION is processing on grounds of its legitimate interest. In such a case, the CAMVISION does not process the personal data further, unless it proves serious legitimate reasons for processing that override the interests or rights and freedoms of the data subject, or for the establishment, exercise or defense of legal claims.

#### **The right to data portability**

The data subject has the right to obtain personal data pertaining to him/her that the data subject has provided to the CAMVISION, in a structured, commonly used and machine-readable format, and the right to transfer such data to another controller, without the CAMVISION preventing it, in the event that: a) processing is based upon consent and b) processing is being conducted by automated means. When exercising his/her right to data portability, the data subject has the right for personal data to be transferred directly by one controller to another controller, if this is technically feasible.

#### **The right to lodge a complaint with a supervisory authority**

If the data subject believes that the CAMVISION is not processing his/her personal data in a lawful manner, the data subject has the right to lodge a complaint with a supervisory authority. The supervisory authority is the Office for Personal Data Protection with registered office at Pplk. Sochora 27, 170 00 Praha 7, e-mail: [posta@uoou.cz](mailto:posta@uoou.cz), tel.: 234 665 125.

#### **The right to information regarding the correction or erasure of personal data or a restriction of processing**

The CAMVISION is obligated to notify individual recipients to whom personal data have been disclosed of all corrections or erasures of personal data or restrictions on processing, with the exception of cases where this is found to be impossible or it requires a disproportionate effort. If the data subject requests it, the CAMVISION informs the data subject of such recipients.

#### **The right to be informed in the event of a breach of personal data security**

If it is likely that a certain case of personal data security breach will result in a high risk to the rights and freedoms of natural persons, the CAMVISION shall notify the data subject of such breach without undue delay.

#### **The right to withdraw consent to the processing of personal data**

If the CAMVISION processes any personal data on the basis of consent, the data subject has the right to withdraw its consent to the processing of personal data at any time in writing, by sending a non-consent to the processing of personal data to the email address [info@panoris.com](mailto:info@panoris.com).

#### **The right not to be a subject to any decision based solely on automated individual decision-making, including profiling.**

We do not conduct automated individual decision-making or profiling during the processing of personal data within the meaning of the Art. 22 of the GDPR.

### **COOKIE FILES**

The CAMVISION uses cookie files, small text files that identify the user of the websites [app.panoris.com](http://app.panoris.com), [control.panoris.com](http://control.panoris.com) or [www.panoris.com](http://www.panoris.com) and record the user's user activities. The text of a cookie file often consists of a series of numbers and letters that uniquely identify the user's computer, but do not provide any specific personal data regarding the user.

The website app.panoris.com, control.panoris.com or www.panoris.com automatically identifies the user's IP address. The IP address is the number automatically assigned to the user's computer upon connecting to the internet. All such information is recorded in the activity file by the server, which enables the subsequent processing of data.

**Purpose of using cookie files:** The CAMVISION uses cookie files and similar technologies for several purposes, which include:

- **Logging in and authentication.** As soon as the data subject uses the "remember Application log-in" function, an encrypted cookie file is stored on the subject's device, which enables the data subject to move between the website's pages without the need to log in repeatedly.
- **Security.** The CAMVISION uses cookie files in order to reveal fraud and misuse of the website app.panoris.com, control.panoris.com or www.panoris.com.
- **Analysis.** The CAMVISION uses cookie files and other identifiers for the purpose of collecting data on the use and performance of the website app.panoris.com, control.panoris.com or www.panoris.com.

Third party cookie files may also be located on the websites app.panoris.com, control.panoris.com or www.panoris.com. For example, this may be so because the CAMVISION has authorized a third party to, for example, conduct a site analysis. The CAMVISION utilizes the following service:

- Google Analytics service – the company Google

**Cookie setting:** The majority of web browsers accept cookie files automatically. However, they provide controls that enable them to be blocked or removed. Users of the websites app.panoris.com, control.panoris.com or www.panoris.com are thus entitled to set their browser in such a way so that the use of cookie files on their computer is prevented. Instructions for blocking or removing cookie files in browsers may usually be found in the user documentation of individual browsers.