

PERSONAL DATA PROTECTION RULES

260806

The purpose of this document is to provide you with information about personal data processing in the company PANORIS 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 PANORIS 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, control.panoris.com or www.panoris.com and at the register office of the company PANORIS 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, control.panoris.com or www.panoris.com.

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

IDENTIFICATION DATA

PANORIS s.r.o., identification number (IČ) 27820050, with registered office at Purkyňova 649/127, Medlánky, 612 00 Brno, a company registered in the Commercial Register with the Regional Court in Brno, section C, file 69494 (hereinafter also referred to as „PANORIS“).

Contact e-mail: info@panoris.com.

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

PANORIS AS PERSONAL DATA CONTROLLER

The PANORIS 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, control.panoris.com or www.panoris.com.

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

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

If the PANORIS 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 PANORIS 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 PANORIS 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 PANORIS's legitimate interests, the PANORIS processes these for the duration of time necessary in order to exercise such rights.

PANORIS AS PERSONAL DATA PROCESSOR

The PANORIS 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 PANORIS's servers, or within a hosting center, the PANORIS acts in the position of a personal data processor. The controller of such personal data is the PANORIS's partner.**

The PANORIS 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 PANORIS 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 PANORIS does not process personal data pertaining to judgments in criminal matters and criminal acts. The PANORIS 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 PANORIS processes personal data for the duration of the Agreement. After the elapse of 30 days from the termination of the Agreement, the PANORIS will erase (delete) all of the customers' data stored on the PANORIS's servers unless the contracting parties agree otherwise.

RECIPIENTS OF PERSONAL DATA

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

Processors of personal data are:

Area of cooperation	Processor Identification
Google Cloud-based productivity suite (Google Workspace), including email communication, document storage, collaboration tools, and artificial intelligence services (Gemini).	Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland.
Tomáš Winkler Application development	Tomáš Winkler, IČO 06141129, Vinařického 3552/9, Brno 615 00

Amazon Web Services EMEA SARL Servers and Cloud Services (Hosting, data storage and cloud infrastructure)	Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, L-1855 Luxembourg
Okta, Inc. (Auth0) Authentication provider	Okta, Inc., 100 First Street, Suite 600, San Francisco, CA 94105, USA
mongoDB Cloud Database servers	mongoDB Cloud, 3 Shelbourne Building, 3rd Floor, Crampton Avenue, Ballsbridge, Dublin 4, Ireland.
Buršíková, s.r.o. Accountancy, tax advice	9. května 3549/88b, Přerov I-Město, 750 02 Přerov IČO 04699874, DIČ CZ04699874
Fakturoid s. r. o. Invoice management	V Pláni 532/7, Praha 4, 142 00, IČO: 04656679, DIČ: CZ04656679
WeTransfer B.V. Data transfers	WeTransfer B.V. having its registered office at Oostelijke Handelskade 751, 1019 BW Amsterdam, Netherlands
Teamviewer Remote access to servers	TeamViewer Germany GmbH, Bahnhofplatz 2, 73033 Göppingen, Germany
WhatsApp Communication support channel	WhatsApp Ireland Limited, 4 Grand Canal Square Grand Canal Harbour, Dublin 2, Ireland
JetBrains YouTrack Project management platform	JetBrains s.r.o., Praha 4, Na Hřebenech II 1718/10, PSČ 140 00, Czech Republic
reMarkable Connect Document cloud service	REMARKABLE AS, Biermanns gate 6, 0473 Oslo, Norway
Raynet CRM Cloud CRM system	RAYNET s.r.o., IČO: 26843820, Hlavní třída 6078/13, Poruba, 708 00 Ostrava, Czech Republic
Šetina, Komendová & Partners s.r.o., advokátní kancelář Legal services	Florianova 440/17, 612 00 Brno, Czech Republic
ESET, spol. s r.o. Antivirus and endpoint security services	Einsteinova 24, 85101 Bratislava, Slovak Republic
OpenAI (Artificial intelligence services, data analysis and processing)	OpenAI Ireland Limited 1st Floor, The Liffey Trust Center 117 - 126 Sheriff Street Upper, Dublin
Microsoft 365 (office applications, team collaboration, and cloud data storage via OneDrive)	One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland

Adobe (Creative Cloud services, document management and digital signatures)	4-6 Riverwalk, Citywest Business Campus, Dublin 24, Ireland
Odoo (ERP system, business process management, CRM and invoicing)	Chaussée de Namur 40, 1367 Grand-Rosière, Belgium

Processing of personal data may be conducted for the PANORIS 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 PANORIS may disclose them directly to other entities within the scope as set out in a special law.

PANORIS 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/>).

In case PANORIS transfers personal data to third countries, PANORIS shall ensure an adequate level of personal data protection according to the GDPR. These companies act only as processors of personal data.

TECHNICAL SECURITY OF DATA

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

The PANORIS 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 PANORIS 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 PANORIS 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 PANORIS 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 PANORIS 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 PANORIS 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 PANORIS 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 PANORIS'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 PANORIS is processing on grounds of its legitimate interest. In such a case, the PANORIS 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 PANORIS, in a structured, commonly used and machine-readable format, and the right to transfer such data to another controller, without the PANORIS 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 PANORIS 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, tel.: 234 665 125.

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

The PANORIS 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 PANORIS 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 PANORIS shall notify the data subject of such breach without undue delay.

The right to withdraw consent to the processing of personal data

If the PANORIS 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.

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 PANORIS uses cookie files, small text files that identify the user of the websites app.panoris.com, control.panoris.com or 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 PANORIS uses cookie files and similar technologies for several purposes, which include:

Webpage: www.panoris.com

Name of Cookies	Purpose and Expiration
Google Analytics service	Google Analytics - To register visitor flows, sources and pageviews. Expiration: 2 years

Webpage: app.panoris.com and control.panoris.com

Name of Cookies	Purpose and Expiration
Google Analytics service	Google Analytics - To register visitor flows, sources and pageviews. Expiration: 2 years
Auth0	Authentication service Expiration: 6 years

Cookie setting: Users of the websites app.panoris.com, control.panoris.com, or www.panoris.com grant their active and informed consent to the use of cookie files via a cookie banner displayed upon their visit. This consent is obtained before any cookies, other than those strictly necessary for the website's operation, are stored on the user's device. Users have the right to withdraw or modify their consent at any time through the cookie settings interface available on the websites.