

# Prague Visitor Pass Customers' Personal Data Protection

## Recitals

Prague City Tourism, a.s. with its registered seat at the address Žatecká 110/2, 110 00 Prague 1 - Staré Město, registered in the Commercial Register administered by the Municipal Court in Prague, Section B, Record 23670, ID No.: 07312890, VAT No.: CZ07312890 (hereinafter only the “PCT”) operates the Prague Visitor Pass multipurpose visitor card project, which includes the service of admission to selected acceptance points and check-in of passengers in Prague public transport with a specially agreed tariff. In connection with the aforementioned project, PCT specifies the terms and conditions of the Prague Visitor Pass system customers’ personal data processing and protection (hereinafter only the “PVP system”) (these terms and conditions of personal data processing and protection are hereinafter referred to as the “Terms and Conditions”).

The Terms and Conditions define the main principles that the PCT follows when collecting and processing personal data in connection with the PVP system. PCT processes the personal data in compliance with 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 also referred to as “GDPR”) and with Act No. 110/2019 Coll., Act on Personal Data Processing, as amended.

## 1. Basic Provisions

Personal data of end customers or persons registered in the PVP system (hereinafter only the “personal data”) will be processed by the Controller and Processor in compliance with these Terms and Conditions. The rights and obligations of the Controller, Processor and customers under the PVP system are governed by these Terms and Conditions. These Terms and Conditions apply to all persons who visit the [www.praguevisitorpass.eu](http://www.praguevisitorpass.eu) website (hereinafter only the “website”) or use the Prague Visitor Pass mobile application (hereinafter only the “application”).

### 1.1. Controller

PCT acts as the Controller for the processing of personal data within the PVP system.

### 1.2. Processor

The personal data Processor, i.e. the entity that carries out data processing for the Controller within the PVP system, is: Operátor ICT, a.s. with its registered seat at the address Dělnická 213/12, 170 00 Prague 7, ID No.: 02795281, VAT No.: CZ02795281 (hereinafter only the “OICT”). PCT also processes the personal data within the PVP system. In case of personal data processing within the PVP system, both of these entities will be hereinafter referred to as the Processor.

Within the framework of the PVP system, the Processor is authorized to collect, process, and keep the personal data provided by customers to the extent necessary exclusively for the provision of PVP system services, handling of claims and related actions, as well as for archiving purposes. The Processor is also authorized to process the provided personal data for commercial and marketing purposes, where the scope of such processing is also governed by these Terms and Conditions.

### 1.3. Customer

Customer for the purpose of these Terms and Conditions is a person who visits the [www.praguevisitorpass.eu](http://www.praguevisitorpass.eu) website or Prague Visitor Pass application where they can purchase the Prague

Visitor Pass product (with or without registration).

When using the website or the application, the customer may not interfere with safety of the website or application, use them to transmit malicious files, or attempt to access the parts of the website or application inaccessible to public. The customer is obliged to honor the copyright relating to the website and the application.

## 2. Principles of Personal Data Processing

Personal data processing within the PVP system shall be governed by the principles set out in the GDPR. These principles include in particular:

- Lawfulness of the personal data processing - the personal data processing is only possible for a reason envisaged by law. Personal data processing within the PVP system is carried out mainly for reasons necessary for the performance of contractual obligations and on the groundwork of customers' consent to the processing in accordance with these Terms and Conditions.
- Transparency - the customer is informed about the processing of their personal data, including the parameters of such processing.
- Limitation by purpose – the personal data is processed for a clear purpose which is defined in advance – for the implementation of the PVP system and the provision of services through this system. Beyond what is necessary for the implementation of the PVP system, the personal data is processed for the purposes further specified in these Terms and Conditions.
- Data minimization – personal data is processed only to the extent necessary to achieve the purpose of such processing – i.e. to the extent necessary for possible provision of services within the PVP system.
- Data accuracy – only accurate and up-to-date data is processed.
- Data retention limitation – the personal data is only retained for a limited and necessary period of time.
- Data security and integrity.
- Demonstrable responsibility for the compliance with GDPR.

## 3. What Personal Data is Processed?

Provision of personal data by the customer is voluntary but indispensable for contract execution and performance.

### 3.1. Personal Data Provided by Customer

In order to make a purchase on the website or through the application, the customer is required to provide their first name, last name, email address, address (street and house number), city, postal code and country, which they fill into the registration form or at the time of purchase in the PVP system. Other data is not mandatory.

If the PVP product is purchased by a business company, other business entity or legal entity, the billing details of that company/entity are mandatory.

For direct marketing purposes further specified in these Terms and Conditions, the PCT processes name, surname, e-mail address, and country of a customer who have registered or purchased the product.

In the event that the customer cancels the registration in the PVP system – cancels their account on the website or mobile application – without making any purchase/order, the provided personal data of the given customer will no longer be processed. In the event that the customer cancels the registration in the PVP system – cancels their account on the website or mobile application – after the purchase/order has

been completed, the provided personal data of the customer will continue to be processed only to the extent necessary for the fulfillment of PCT obligations established by generally binding legal regulations.

### 3.2. Personal Data of Third Persons

If the customer provides personal data of a third person, it is customer's obligation to inform relevant person accordingly and obtain their consent with these Terms and Conditions.

### 3.3. Customer's Data that is Processed Automatically

Whenever the customer visits the website or uses the application, the Processor may collect customer's information like IP address and time of website access, information about web browser used, operating system, or language settings. It is also possible to process information about customer's actions, mainly about used links.

Information about actions taken on the website and within the application is anonymized. It is not technically possible to identify a specific visitor of the website based on the anonymized IP address. Therefore, this action does not represent personal data processing. Anonymized customer information is processed with Google Analytics tools for customers' activity measurement. The customer is authorized to object against this data collection. Detailed information about Google Analytics and about personal data protection is available at <https://policies.google.com/privacy?hl=en>.

If the customer wishes to prevent this monitoring, they can install a web browser add-on available at <https://tools.google.com/dlpage/gaoptout>.

## 4. Why We Process and Collect the Personal Data

Personal data is processed within the PVP system:

- To the extent necessary for the conclusion and performance of the contract with the customer.
- Based on the customer's free and informed consent - data provided by the customer at the time of registration or during purchase within the PVP system.

Customer's personal data is processed and collected for the following reasons.

- Purchase of Pass and/or e-Pass: One of the most important reasons for the processing of customer's personal data is that the voucher can be correctly matched to relevant order at the time of Pass or e-Pass purchase.
- Customer care: In case of any questions regarding use, claim, cancellation, or problem, the customers can use the following e-mail address: [praguevisitorpass@prague.eu](mailto:praguevisitorpass@prague.eu) or contact form at the website.
- User account: Thanks to customer registration, in which the customer provides their personal data, the customer obtains a number of advantages, in particular an overview of the purchased vouchers. In addition, the customer can activate an e-Pass in the mobile application.
- Marketing activities of the Processor, for example in the form of direct marketing in connection with the PVP system
- Customer rating of the Pass and/or e-Pass: Customer may be requested to rate the Pass and/or e-Pass after purchase and use.
- Exercise of rights and legal claims and inspections by public authorities: personal data may be processed whenever such processing is necessary for exercise of a legal claim towards the customer or for the purpose of inspections by public authorities and for other similarly serious reasons.
- Performance and execution of agreement: Personal data of customers is needed to conclude a

purchase contract regarding the vouchers which the customer wishes to purchase. The personal data also serves as the billing data.

#### **4.1. Cookies**

Whenever the customer visits the website, small files known as cookies are stored into and subsequently read from the customer's device. Cookie is a small file that is stored in customer's web browser or computer's hard drive. Cookies are then sent back and recognized by the website each time you visit the website. There are several types of cookies, so-called functional cookies are necessary for the proper functioning of the website and the customer is informed about their existence when visiting the website.

The customer expresses their consent to the use of other types of cookies using a button that appears when they visit the website. If the customer clicks on the Reject button, the website will remain in the mode where it uses only the aforementioned functional cookies, i.e. the cookies that are absolutely necessary for the proper provision of basic website functions.

#### **4.2. Legitimate Interest**

If the customer visits [www.praguevisitorpass.eu](http://www.praguevisitorpass.eu) website, PCT processes data about customer's actions on the website based on a legitimate interest for the purpose of:

- Obtaining information based on which PCT will be able to improve the website in the future, so that the customer can shop even easier on the website; the legitimate interest of PCT thus consists in improving the PCT's services for the customer.
- Compilation of statistics and reports, in particular monitoring the visit rate of the website, its individual pages, and measuring the effectiveness of advertising; the legitimate interest of PCT is thus to measure the effectiveness of the website and advertising costs.
- Preventing attacks on the website and endangering its functionality and data security; the legitimate interest of PCT is thus to ensure trouble-free functionality of PCT's services and data security.
- Direct marketing

#### **4.3. Notifications**

The customer consents to the display of notifications within the application in relation to previously provided information. Notification is a notice or reminder in connection with voucher purchase and e-Pass usage. The customer can adjust displaying of notifications in their mobile device settings.

### **5. Personal Data Processing by a Third Party/Transfer of Personal Data to Third Parties**

In the following cases, the customer's personal data is processed by a third party or transferred to third parties:

- Payment cards: Data about payment cards that the customer can use to pay on the website and in the application; this data is only processed by the PayU payment gateway.
- State authorities: in the event of enforcement of rights, the customer's personal data may be passed on to a third party. If the law or a public authority impose an obligation on the Processor/Controller to transmit personal data, it is obliged to do so.

## 6. How Long Is the Personal Data Kept?

Customer's personal data is stored and processed for the entire term of the contractual relationship. After the contractual relationship termination, the personal data is processed for the period of time specified by and in compliance with the relevant legislation. The data is then completely anonymized or destroyed.

Data obtained through registration is processed for the period of use of the services and further usually for a necessary time, which will depend on legal actions that will have to be taken in a certain situation. Subsequently, only identification data on method of account cancellation will be stored for a reasonable period of time.

## 7. Personal Data Securing

The Processor has taken all measures, in particular organizational, technical and personnel related measures, which ensure the compliance of the provision of services with the currently valid and effective legislation relating to the protection of personal data and to protection of other data stored in the PVP's system.

### 7.1. Password Security

User passwords cannot be displayed in the system administration and it is also not possible to handle them in any way. The PVP system administrator is not allowed to store user passwords in the user database and handle them in any way. The system administrators are allowed to change user passwords only upon an express request of given user.

## 8. What are the Customer's Other Rights in Connection with the Protection of Personal Data?

Other customer's rights in relation to the protection of personal data include in particular the right to information and access to the processed personal data; the right to rectification, amendment; the right to deletion (right to be forgotten); the right to restriction of processing; the right to portability of personal data; the right to object, the right to file a complaint with a supervisory authority. Many of these rights require an active action by the customer.

### 8.1. Right to Information

The customer has the right to be informed about the processing of their personal data. Basic information on the personal data processing - its reasons/purposes, the category of processed data and other information is set out in these Terms and Conditions.

The customer is entitled to obtain a confirmation as to whether or not their personal data is processed on the groundwork of their active request sent through the contact form on the website or to the e-mail address [praguevisitorpass@prague.eu](mailto:praguevisitorpass@prague.eu).

### 8.2. Modification, Amendment, Rectification

The customer can modify or amend their personal data in relevant section of their user account on the website or in the application. Alternatively, they can use contact via the contact form on the website or using the e-mail address [praguevisitorpass@prague.eu](mailto:praguevisitorpass@prague.eu). If the customer believes that their processed personal data is incorrect, they can also use the contact form on the website or the above-mentioned e-mail address [praguevisitorpass@prague.eu](mailto:praguevisitorpass@prague.eu). The Processor is obliged to process the accurate and up-to-date

personal data.

### 8.3. Personal Data Deletion (Right to be Forgotten)

The customer may request deletion of their personal data, except for data on documents that must be kept according to law.

Payment card data is stored through the PayU payment gateway.

The customer has the right to have their personal data deleted, in particular in the following cases:

- The personal data is no longer needed for the purposes for which it was collected and processed.
- The customer has withdrawn their consent, based on which the data was processed and there is no further legal reason for processing of such data;
- The customer has objected to the processing of personal data and believes that the assessment of the objection will lead to conclusion conclude that, in the particular situation, their interest outweighs the interest in the processing of such personal data.
- Personal data is processed illegally.
- The deletion obligation is stipulated by a special legal regulation.

The customer can exercise the right to deletion using the contact form on the website or the e-mail address [praguevisitorpass@prague.eu](mailto:praguevisitorpass@prague.eu).

Customer's personal data will not be deleted mainly in the following cases:

- The personal data is necessary to comply with legal obligations - e.g. the obligations imposed by tax or accounting regulations.
- Where further processing is necessary for the establishment, defense or exercise of legal claims.

### 8.4. Right to Personal Data Portability

The customer has the right to request the transfer of their processed personal data to another entity or another controller identified by the customer, in a structured, commonly used and machine-readable format, via the contact form on the website or using the e-mail address [praguevisitorpass@prague.eu](mailto:praguevisitorpass@prague.eu).

### 8.5. Raising an Objection

The customer may object to the processing of personal data on the groundwork of a legitimate interest of PCT through the contact form on the website or using the e-mail address [praguevisitorpass@prague.eu](mailto:praguevisitorpass@prague.eu).

### 8.6. Restriction of Processing

The customer has the right to limit the processing of their personal data, which consists in the fact that the data is not deleted, but its active use, e.g. for marketing purposes, is temporarily suspended - i.e. removed from the "active" database.

Restriction of the customer's personal data processing may occur for the following reasons:

- If the customer does not agree with the processing of their personal data, either because they object to its inaccuracy or because they have objected to the processing (see above).
- The personal data is no longer needed for the processing purposes, however, the customer requires it for identification, exercise, or defense of their legal claims.

### 8.7. Filing a Complaint

The customer may also file a complaint with the Personal Data Protection Authority, having the registered

seat at Pplk. Sochora 27, 170 00 Prague 7, or using website <https://www.uoou.cz/>.

## **8.8. No Charge for Communication and Actions**

As a matter of principle, all communications and actions under this Section 8 of the Terms and Conditions are provided and performed free of charge. Only if the requests are manifestly unjustified or unreasonable, in particular because of their repetitive character, a reasonable fee may be imposed or the request may be rejected.

## **8.9. Links to Other Pages**

The website and the application contain links to websites, over which OICT or the Controller have no control. If the customer visits any of these websites, they should become familiar with their privacy policy. Neither OICT nor the Controller bear any responsibility for the procedures or policies of other companies.

## **9. Final Provisions**

Both OICT and the Controller reserve the right to amend their privacy policy, while the current wording will always be available on the website.

The privacy policies of Apple Store and Google Play providers are available on relevant websites; for the Apple Store at [www.apple.com/legal/privacy/en](http://www.apple.com/legal/privacy/en) and for Google Play at [policies.google.com/privacy?hl=en](http://policies.google.com/privacy?hl=en).

*These Terms and Conditions of Prague Visitor Pass Customers' Personal Data Protection are valid and effective from 1 January 2023 and their electronic version is available both on the website and within the application.*