

# Privacy Policy

## Terms of Sale and Use

This page (together with the documents referred to on it) tells you:

- what information we store about you;
- under which conditions and how will your personal data be treated;

## Information About Us

This Privacy Policy describes how any personal data will be handled, stored and dismissed in contractual relationship ("Services") between Palenčár & Partners Consulting s.r.o., Company ID No.: 04722671, Za Hládkovem 680/12, Střešovice, 169 00 Praha 6, registered in the Commercial Register maintained by the Prague Municipal Court, Section C, File No. 252221, representing Community Building Institute Czech Republic (the "CBI") and the User (which includes both consumers and other customers).

For any questions, please contact us via email at [info@institutbk.cz](mailto:info@institutbk.cz).

In the Terms, "**we**", "**us**" and "**our**" means CBI.

## Privacy Policy

### 1 Application

This Privacy Policy sets forth our policy with respect to information that can be associated with or which relates to a person and/or could be used to identify a person ("Personal Data") that is collected from Users on or through the Services. We take the privacy of your Personal Data seriously. Because of that, we have created this Privacy Policy. Please read this Privacy Policy as it includes important information regarding your Personal Data and other information.

"Non-Personal Data" as used in this Privacy Policy is therefore any information that does not relate to a person and/or cannot be used to identify a person. When you interact with the Services, we may collect Non-Personal Data. The limitations and requirements in this Privacy Policy on our collection, use, disclosure, transfer and storage/retention of Personal Data do not apply to Non-Personal Data.

### 2. Personal Data That We Collect.

When you use or interact with us through the Services, we may collect Personal Data. Sometimes this will be on our own behalf and other times this will be on behalf of an Organiser using our Services to run an event. This is an important distinction for EU data protection law purposes and is explained in more detail in Section 16 below.

#### 2.1 All Users.

Information you provide to us: For all Users we collect Personal Data when you voluntarily provide such information to the Services, such as when you register for access to the Services, contact us with inquiries, respond to one of our surveys or browse or use certain parts of the Services. The Personal Data we may collect includes without limitation your name, address, email address and other information that enables Users to be personally identified.

Information we automatically collect: We also automatically collect certain technical data that is sent to us from the computer, mobile device and/or browser through which you access the Services ("Automatic Data"). Automatic Data, includes without limitation, a unique identifier

associated with your access device and/or browser (including, for example, your Internet Protocol (IP) address) characteristics about your access device and/or browser, statistics on your activities on the Services, information about how you came to the Services and data collected through Cookies, Pixel Tags, Local Shared Objects, Web Storage and other similar technologies. You can find out more information about how we use Cookies and other similar tracking technologies in our Cookie Statement.

When you register for the Services or otherwise submit Personal Data to us, we may associate other Non-Personal Data (including Non-Personal Data we collect from third parties) with your Personal Data. At such instance, we will treat any such combined data as your Personal Data until such time as it can no longer be associated with you or used to identify you.

### 3. How We Use Your Personal Data.

We collect and use the Personal Data we collect in a manner that is consistent with this Privacy Policy. We may use the Personal Data as follows:

#### 3.1 Specific Reason.

If you provide Personal Data for a certain purpose, we may use the Personal Data in connection with the purpose for which it was provided. For instance, if you contact us by e-mail, we will use the Personal Data you provide to answer your question or resolve your problem and will respond to the email address from which the contact came.

#### 3.2 Access and Use.

If you provide Personal Data in order to obtain access to or use of the Services or any functionality thereof, we will use your Personal Data to provide you with access to or use of the Services or functionality and to analyse your use of such Services or functionality. For instance, if you supply Personal Data relating to your identity or qualifications to use certain portions of the Services, we will use that information to make a decision as to granting you access to use such Services and to assess your ongoing qualification to use such Services.

#### 3.3 Internal Business Purposes.

We may use your Personal Data for internal business purposes, including without limitation, to help us improve the content and functionality of the Services, to better understand our Users, to improve the Services, to protect against, identify or address wrongdoing, to enforce our Terms of Service, to manage your account and provide you with customer service, and to generally manage the Services and our business.

#### 3.4 CBI Marketing Communications.

Where it is in accordance with your marketing preferences, we may use your Personal Data to contact you in the future for our marketing and advertising purposes, including without limitation, to inform you about services or events we believe might be of interest to you, to develop promotional or marketing materials and provide those materials to you, and to display content and advertising on or off the Services that we believe might be of interest to you. See "Opt Out from Electronic Communications" below on how to opt out of CBI Marketing Communications.

#### 3.5 Other Purposes.

If we intend to use any Personal Data in any manner that is not consistent with this Privacy Policy, you will be informed of such anticipated use prior to or at the time the Personal Data is collected or we will obtain your consent subsequent to such collection but prior to such use.

### 3.6 Aggregated Personal Data.

In an ongoing effort to understand and serve our Users better, we often conduct research on our customer demographics, interests and behavior based on Personal Data and other information that we have collected. This research is typically conducted on an aggregate basis only that does not identify you. Once Personal Data is in an aggregated form, for purposes of this Privacy Policy, it becomes Non-Personal Data.

## 4. How We Disclose And Transfer Your Personal Data.

### 4.1 No Sale.

We are not in the business of selling your Personal Data. We consider this information to be a vital part of our relationship with you. Therefore, we will not sell your Personal Data to third parties, including third party advertisers. There are, however, certain circumstances in which we may disclose, transfer or share your Personal Data with certain third parties without further notice to you, as set forth below.

### 4.2 Parent Companies, Subsidiaries and Affiliates.

We may also share your Personal Data with our parent companies, subsidiaries and/or affiliates for purposes consistent with this Privacy Policy. Our parent companies, subsidiaries and affiliates will be bound to maintain that Personal Data in accordance with this Privacy Policy.

### 4.3 Agents, Consultants and Service Providers.

We may share your Personal Data with our contractors and service providers who process Personal Data on behalf of Eventbrite to perform certain business-related functions. These companies include our marketing agencies, database service providers, backup and disaster recovery service providers, email service providers and others. When we engage another company to perform such functions, we may provide them with information, including Personal Data, in connection with their performance of such functions.

### 4.4 Legal Requirements.

We may disclose your Personal Data if required to do so by law in order to (for example) respond to a subpoena or request from law enforcement, a court or a government agency (including in response to public authorities to meet national security or law enforcement requirements), or in the good faith belief that such action is necessary to (a) comply with a legal obligation, (b) protect or defend our rights, interests or property or that of third parties, (c) prevent or investigate possible wrongdoing in connection with the Services, (d) act in urgent circumstances to protect the personal safety of Users of the Services or the public, or (e) protect against legal liability.

### 4.5 How We Store Your Personal Data.

We may store Personal Data itself or such information may be stored by third parties to whom we have transferred it in accordance with this Privacy Policy. We take what we believe to be reasonable steps to protect the Personal Data collected via the Services from loss, misuse, unauthorised use, access, inadvertent disclosure, alteration and destruction. However, no network, server, database or Internet or e-mail transmission is ever fully secure or error free. Therefore, you should take special care in deciding what information you send to us electronically. Please keep this in mind when disclosing any Personal Data.

## 5. How You Can Access, Update, Correct or Delete Your Personal Data.

You can request access to some of your Personal Data being stored by us. You can also ask us to correct, update or delete any inaccurate Personal Data that we process about them.

If you are a registered User, you can exercise these rights by logging in and visiting the My Account page. Both registered and unregistered Users may also exercise these rights by contacting us directly by email or at the address specified below.

If a User initiates a data deletion request, CBI is authorised to delete or anonymize Personal Data of the requesting User from the Services. We will consider and respond to all requests in accordance with applicable law.

## 6. How Long We Retain Your Personal Data.

We may retain your Personal Data as long as you are registered to use the Services. You may close your account by contacting us. However, we may retain Personal Data for an additional period as is permitted or required under applicable laws. Even if we delete your Personal Data it may persist on backup or archival media for an additional period of time for legal, tax or regulatory reasons or for legitimate and lawful business purposes.

## 7. The EU General Data Protection Regulation (GDPR)

### 7.1 Legal grounds for processing your Personal Data

The GDPR requires us to tell you about the legal ground we're relying on to process any Personal Data about you. The legal grounds for us processing your Personal Data for the purposes set out in Section 4 above will typically be because:

- you provided your consent;
- it is necessary for our contractual relationship;
- the processing is necessary for us to comply with our legal or regulatory obligations; and/or
- the processing is in our legitimate interest as an event organising and ticketing platform (for example, to protect the security and integrity of our systems and to provide you with customer service, etc.).

### 7.2 Transfers of Personal Data

### 7.3 Personal Data retention

We retain your Personal Data for as long as necessary to provide you with our Services, or for other important purposes such as complying with legal obligations, resolving disputes, and enforcing our agreements.

If you have an account with us, we will typically retain your Personal Data for a period of 90 days after you have requested that your account is closed or if it's been inactive for 7 years.

### 7.4 Your rights.

Data protection law provides you with rights in respect of Personal Data that we hold about you, including the right to request a copy of the Personal Data, request that we rectify, restrict or delete your Personal Data, object to profiling and unsubscribe from marketing communications.

If you have a complaint about how we handle your Personal Data, please get in touch with us. If you are not happy with how we have attempted to resolve your complaint, you may contact the relevant data protection authority.

#### 7.5 CBI as a data controller and a data processor

EU data protection law makes a distinction between organisations that process Personal Data for their own purposes (known as "data controllers") and organisations that process Personal Data on behalf of other organisations (known as "data processors"). If you have a question or complaint about how your Personal Data is handled, these should always be directed to the relevant data controller since they are the ones with primary responsibility for your Personal Data.

CBI may act as either a data controller or a data processor in respect of your Personal Data, depending on the circumstances.