

RULES REGARDING THE PROCESSING OF PERSONAL DATA DURING THE USE OF WEB PAGES **WWW.ROOMRENT.CZ**

Principles of personal data processing for users of www.roomrent.cz

The operator of the website www.roomrent.cz, which offers accommodation options for international students in the Czech Republic (**Platform**), and the controller of the personal data provided by Roomrent users is the company Izi Rent Prague s.r.o., ID No. 10724184, registered office at Jaurisova 515/4, Michle, 140 00 Prague 4, entered in the commercial register maintained by the Municipal Court in Prague, File No. C 347290 (**Controller**). He has adopted the following Rules of Personal Data Processing, which will be applicable by the Controller in connection with the use of the Roomrent Platform and booking accommodation on the Platform.

The main objective is to provide information on the manner and scope of processing personal data during interactions between the data subject and the Controller through the Platform, when using the Controller's website, during contact between the Controller and potential customers and when sending commercial communications or using cookies (**Rules**).

The Rules also contain information on the rights of personal data subjects concerning the processing of their personal data. The Rules are effective as of 1 September 2020 and have been prepared under Regulation (EU) No. 2016/679 of the European Parliament and of the Council on the protection of natural persons concerning the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (**Regulation**), and under Act No. 110/2019 Coll., on the processing of personal data, as amended from time to time.

The Rules are intended for users of the Platform, potential clients (customers) of the Controller or their representatives, and those interested in reserving accommodation with the eventual auxiliary services of the Controller (**Users**). The scope, purpose, and reason for processing personal data vary in specific situations and correspond to the specific relationship between these persons and the Controller.

The Rules first contain general provisions, mainly of an informative nature, on the processing of personal data (**I.**) and then a description, for each situation in which personal data will be processed, of the specific conditions applicable, in particular concerning the purpose and method of processing, the period of processing, its scope and the possibility of disclosing personal data to other subjects (**II.**). Finally, the last section summarizes the rights and entitlements of the Users concerning the processing of their personal data (**III.**).

I. General information about the processing of personal data under these Rules

1. Personal data and its meaning

Personal data is any information about an identified or identifiable natural person - the subject of the personal data, who can be identified directly or indirectly, e.g. by reference to an identifier, for example, their name, date or place of birth, possible personal number, e-mail address, telephone number, place of residence, network identifier (cookies), ID and driver's

license number, copies of these IDs, data on social network profiles, chat content, google ID, online and offline data and combinations thereof, data on movement on the Website, including cluster analysis, data on goods purchased to date and services provided by the Controller, etc. In short, these are any data that could identify a specific natural person alone or in combination with other data.

2. Personal data processing activities

The processing of personal data means any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated processes, such as the obtaining, collection, use, alignment or combination, organization, structuring, rearrangement or combination, storage, adaptation or alteration, retrieval, consultation, recording, use, dissemination, disclosure by transmission or any other disclosure, restriction, erasure or destruction of personal data.

3. Purpose, legal basis, and scope of the processing of personal data

Under Article 6 of the Regulation, the Controller may only process personal data for specific legal reasons, namely based on a contract, based on the law (imposed legal obligation), if the processing is in the public interest or necessary to protect the vital interests of the data subject or another natural person, based on the legitimate interests of the Controller or a third party, or based on the data subject's consent.

The scope of the processed data depends on the purpose and legal reason for the processing.

4. Transfer of personal data to third parties

In some cases, the Controller uses the services of other entities in connection with its business activities, which may, among other things, process personal data transmitted by the Controller for the Controller. Such entities then have, in the majority of cases, the status of personal data processors, have a contract with the Controller for the protection and processing of personal data, and process personal data only on the basis of the Controller's instructions and under strict conditions of protection and security of personal data. For example, IT system administrators, webmasters, accountants, lawyers, auditors, marketing agencies, or cooperating companies (e.g. studying agencies) etc.

In performing its legal obligations, the Controller also transmits personal data to public authorities (e.g. courts, law enforcement authorities, administrative authorities, etc.) to the extent necessary and within the limits of the law.

In principle, the controller does not transfer personal data to third countries (i.e. countries outside the European Economic Area). Should any personal data be transferred to third countries, this will always be done in particular within the Group and in full compliance with the GDPR and the Act.

II. Processing of personal data by the Controller in individual situations

This section of the Rules specifies the specific activities that may (and regularly do) involve the processing (and storage) of personal data of subjects.

A. Use of cookies when navigating the Website

When navigating the Controller's website (www.roomrent.cz), small text files are stored in the data subject's browser - so-called cookies. The storage of cookies requires the data subject's consent in so-called "opt-in" mode.

Cookies are small text files containing an insignificant amount of information (letters and numbers) that are stored on data subjects' devices when they visit the Website and navigate through the Platform, and which allow the Website to recognize the web browser or device used by the data subject.

a) Legal basis and purpose of processing:

1. Legitimate interest of the Controller - such cookies that are strictly necessary to ensure the operation of the Website (Platform) and the Controller's internet services;
2. Consent of the data subject - cookies that ensure the basic settings of the website even for data subjects not logged in, which affect the display of the Website according to the data subject's choice (e.g. if the data subject prohibits the display of a certain graphic element, these cookies allow such choice of the data subject to be respected) or which take into account the frequency or order of browsing pages;
3. Consent of the data subject - cookies necessary for the Controller to be able to distinguish individual data subjects when displaying the Website and thus display information relevant only to these data subjects according to their previous preferences;
4. Consent of the data subject - cookies used for marketing activities such as distinguishing between data subjects who have visited the Platform and started to fill in an online form but have not completed and submitted it, with the aim of subsequently contacting these data subjects.

b) Categories of processed personal data:

IP address, subject identification data, operating system used, type of browser used, referring URL, website activity information, dates and times of visits, and type of device.

c) Processing method:

Personal data are processed automatically in electronic form in the electronic information systems of the Controller or a third party (contractual partner), always with high technical, personal, and organizational security in accordance with the Regulation, the Privacy Code, and other applicable legal regulations.

d) Disclosure of data to other entities:

Personal data may be provided to the operator of the Controller's information system and IT system, the operator of the Controller's Website or cloud services, providers of Google measurement codes, etc. Upon request, personal data may be provided to public authorities (e.g. courts, law enforcement authorities, administrative authorities, etc.) to the extent necessary and within the limits of the law (in particular in the case of legitimate interest of

the Controller). Should personal data be transferred to third countries, this will be done in particular within the Group, and in full compliance with the Regulation and the Privacy Code.

e) Period of processing:

Cookies are stored on the computer or other end device of the data subject for different periods of time, depending on the type of cookies used:

- Persistent cookies (i.e. cookies that remain stored in the web browser - e.g. Chrome, Firefox, Explorer, Edge, Brave etc., even after the session is terminated, until a specified date, or until the user manually deletes them within the settings of a particular browser) - these cookies allow the identification of the user's computer or other terminal device (tablet, mobile phone, etc.) when the specific browser is next launched;
 - Session-limited cookies (i.e., they exist only for the duration of the browser launch and are automatically deleted when the session ends).
- f) **Refusal of cookies:** If the data subject does not wish to have cookies regularly and systematically stored in their browser or wishes to delete all cookies stored in their browser, they may do so in the settings of their browser; however, refusing cookies will have a negative impact on the navigation within the Platform.

B. Reservation of the accommodation through the Platform or via e-mail

a) Legal basis and purpose of processing personal data:

- the possibility of concluding an accommodation contract or other contract regarding the selected accommodation and its subsequent performance, or the related legal action, i.e. the execution of an accommodation reservation by the User, inter alia, based on filling in the reservation form on the Controller's website or email order.
- protection of the legitimate interests of the Controller, i.e. in particular, securing and enforcing the legal claims of the Controller from potentially concluded contractual relations.
- fulfilling legal obligations that apply to the Controller, in particular for the duration of validity under tax or civil law.

b) Categories of processed personal data:

Personal data obtained by the Controller from the data subject in the context of the reservation - this includes in particular identification data (name, surname) and contact data (telephone number, e-mail address, ID's for electronic communication such as chats or social media).

c) Processing method:

Personal data are processed manually and automatically in the electronic information systems of the Controller, respectively a third party (contractual partner), in electronic form,

always with high technical, personal and organizational security in accordance with the Regulation, the the Privacy Code and other applicable laws.

d) Period of processing:

for the period necessary to secure and subsequently implement the reservation of accommodation and related accommodation services, or until the conclusion of a specific accommodation contract or other similar contracts; if no accommodation contract is concluded, the processing period will be equal to 1 year from the reservation, and subsequently for a period of 10 years, when the Controller is entitled or obliged to process personal data to fulfill its legal or contractual obligations, including possible disputes.

e) Disclosure of data to other entities:

Personal data may be provided to the Controller's information system and IT system operator, auditors, attorneys and other parties cooperating with the Controller, who will process personal data for the Controller and other parties cooperating with the Controller, always in accordance with the Regulation, the Privacy Act and other applicable law. Upon request, personal data may be provided to public authorities (e.g. courts, law enforcement authorities, administrative authorities, etc.) to the extent necessary.

C. Direct marketing, or sending commercial communications of the Controller, offers explicitly of accommodation, information about offers of study programs of the cooperating company UniStudy, s.r.o., by electronic communication (e-mail, sms, social networks)

a) Legal basis and purpose of processing personal data:

The legitimate interest of the Controller - addressing in electronic form or texts messages to contacts provided by the data subject with offers studying programs, mediated by the Administrator, or programs of the cooperating company UniStudy, s.r.o., in accordance with 7 (3) of the Privacy Code; the subject has a clear and distinct possibility to refuse consent to such use of their electronic contact in a simple and free manner, even when sending each individual message if they did not initially refuse such use.

b) Categories of processed personal data:

Identification data (name, surname, address) and contact data (e-mail address, telephone number, identification of chat and social media), data on social network profiles, chat content, google ID, online and offline data and their combination, data about navigation on the Website including cluster analysis, data on goods purchased to date and services provided by the Controller.

c) Method of processing personal data:

Personal data are processed manually and automatically in electronic information systems, in electronic or paper form, always with high technical, personal and organizational security in accordance with the Regulation, the Privacy Code and other applicable legal regulations.

d) Period of processing:

Until the data subject explicitly refuses further processing of their personal data for this purpose, this possibility shall be expressly pointed out to the data subject in each commercial communication (delivered message). Any withdrawal of consent shall not affect the lawfulness of the processing of personal data before such action by the data subject.

e) Disclosure of data to other entities:

Personal data may be provided to the Controller's information system and IT system operator, auditors, lawyers, marketing agencies, and other parties cooperating with the Controller who will process personal data for the Controller, and other parties cooperating with the Controller, namely the company UniStudy s.r.o. Upon request, personal data may be provided to public authorities (e.g. courts, law enforcement authorities, administrative authorities, etc.) to the extent necessary.

D. Personal data for the purpose of marketing beyond the direct marketing rules under letter C of this Policy

a) Legal basis and purpose of processing personal data:

Consent of the personal data subject - addressing via e-mail, telephone or post with offers of goods (especially vehicles), other products and services provided by the Controller; informing via e-mail or post about new products, services, events, competitions and subscriptions to the Controller's newsletter; conducting telephone marketing studies to determine customer satisfaction and improve the products and services offered and further develop customer care.

b) Categories of processed personal data:

Identification data (name, surname, title, date of birth, permanent address) and contact data (contact address, telephone number, e-mail address, identification of chat and social media), potential data on social network profiles, data on made reservations, and services provided by the Controller.

c) Method of processing personal data:

Personal data are processed manually and automatically in electronic information systems, in electronic form, always with high technical, personal and organisational security in accordance with the Regulation, the Privacy Code and other applicable legal regulations.

d) **Period of processing of personal data:**

Until the consent is withdrawn, but for a maximum period of 10 years after the consent is granted. Any withdrawal of consent shall not affect the lawfulness of the processing of personal data prior to such action by the data subject.

e) **Disclosure of data to other entities:**

Personal data may be provided to authorized marketing agencies cooperating with the Controller, which will process personal data for the Controller on the basis of a contractual relationship (contract for processing personal data). Upon request, personal data may be provided to public authorities (e.g. courts, law enforcement authorities, administrative authorities, etc.) to the extent necessary. The Controller may also share personal data with a cooperating legal entity.

III. **Rights and authorizations of Users with the Controller**

The personal data subject has the following rights vis-a-vis the Controller:

- the right to request from the Controller access to personal data, their correction in case of inaccuracies, or their deletion if the purpose for which the personal data were processed has passed or if they were processed unlawfully,
- the right to lodge a complaint with the supervisory authority, which is the “*Úřad na ochranu osobních údajů*” (<https://www.uoou.cz/>),
- the right to restriction of processing and the right to object to processing, including profiling, if carried out, at any time free of charge.

The data described in these Rules as necessary to carry out a reservation of accommodation and enter into a contract between the data subject and the Controller and will be as such used by the Controller for those such purposes. Failure to provide the personal data specified herein may limit or completely exclude the ability of the Controller to provide the reservation requested by the User.

If the processing of personal data is based on the consent of the data subject (as in some cases under these Rules), furthermore:

- the right to withdraw consent at any time in writing to the e-mail address info@izirentprague.cz or by post to the Controller's Address,
- the right to erasure of personal data by the Controller, immediately after the period for which consent has been given has expired or consent was withdrawn,
- the right to refuse consent to the processing of personal data by the Controller without incurring any detriment in cases where the Controller has no other legal basis for processing the data.

The User acknowledges that the eventual withdrawal of consent shall not affect the processing of personal data that was carried out prior to the withdrawal of such consent by the Subject.

By submitting and creating a reservation, the User, in addition to expressing consent to these Rules and providing consent to the processing of their personal data in accordance with these Rules, acknowledges that the Controller is entitled to unilaterally change, modify or adapt these Rules to the current legislative situation, in particular in order to optimize the process of reservation and providing services to the Users according to these Rules and the rules of usage of the Platform.

Izi Rent Prague s.r.o.

Before visiting the website, each user should tick the box to agree to the collection of cookies and to agree to this GDPR policy.

- A. With reference to the Controller's processing of personal data, for the purpose of enabling the Controller to inform the User or address via e-mail, sms or other forms of electronic communication offers of goods and or services, which are not necessarily related to the reserved accommodations by the User

grants his/her consent

denies his/her consent

- B. By browsing this web page, www.roomrent.cz, I agree to have acknowledged myself with the rules regarding the processing of personal data during the use of web pages www.roomrent.cz (Rules) and the rules of usage of web pages www.roomrent.cz.

- C. By browsing on this web page www.roomrent.cz I agree to the rules regarding the collection of cookies and its policy as described within the Rules.

2 options:

- *Agree to all*
- *Agree to solely necessary cookies*