

INFORMATION ON PERSONAL DATA PROCESSING

As a personal data processor, the Company **Luxury Brand Management a.s.**, ID No.: 257 00 065, registered seat: Pernerova 676/51, Karlín, 186 00 Prague 8, listed in the Commercial Register maintained by the Municipal Court of Prague, Section B, File 5585 (hereinafter referred to as “**LBM**”), hereby wishes to inform its customers (hereinafter referred to as “**Data Subjects**”) of the method and scope of personal data processing by LBM, including the scope of the Data Subjects’ rights in relation to the processing of their personal data by LBM.

1. Which of your personal data will LBM process?

In accordance 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 (the General Data Protection Regulation; hereinafter referred to as “**the Regulation**”), as well as the relevant domestic legislation in the area of personal data protection, LBM processes the following personal data:

- *address and identification data* (name; surname; date of birth; birth certificate number; address; permanent or other type of residence; nationality; ID document type, number, country or authority of issue, and date of expiry; phone number and e-mail address);
- *profile data* (physical characteristics).

LBM shall only process personal data in compliance with the purposes specified below, and in the scope and for the period of time required for fulfilling the established purposes.

2. For what purposes and on what legal grounds will LBM process your personal data?

a) *Delivery of Ordered Goods/Implementation of a Sale*

- Personal data processing is essential for negotiating entry into or amendments to a contract to which a Data Subject is a party, and for the subsequent performance of such a contract.
- When an order is placed, LBM gathers and processes a Data Subject’s personal data in the following scope – *name, surname, address, date of birth, phone number and e-mail address*. The communication of this personal data of Data Subjects is a basic prerequisite for entering into or amending a purchase contract, where the provision of personal data here serves primarily for clear and unmistakable identification of Data Subjects and, if necessary, for contacting them.
- In connection with the sale of goods, LBM may further process Data Subjects’ personal data in the scope ensuing from a specific contract or Act (e.g. in the case need to personalise the order of Data Subjects’ profile data).

b) *Protection of LBM’s Rights in the Event of a Dispute with a Customer*

- LBM is also authorised to process the above specified range of personal data in order to protect its rights in the event of a dispute with a customer.

c) *Customer Identification*

- Personal data processing in the following scope – *name; surname; permanent or other type of residence; birth certificate number or date of birth; and ID document type, number, country or authority of issue, and date of expiry*, is essential for fulfilling LBM's statutory obligations in the event of a cash payment in an amount exceeding the limit established by Act No. 253/2008 Coll., on certain measures against the legalization of proceeds of crime and terrorist financing, as amended.

d) *Protection of Persons and Property on the Premises of LBM*

- Personal data processing is essential for the purposes of LBM's legitimate interests consisting in ensuring the protection of persons and property.
- LBM shall gather and process Data Subjects' personal data in the scope of – *descriptive data within a video recording*, and shall do so via camera systems with recordings located in individual shops.

e) *Fulfilment of the LBM loyalty programme, i.e. offers of goods and services provided by LBM for members of its loyalty programme, use of data at branches for more efficient service of loyalty programme members, sending information on organised marketing and social events, and sending business communications by electronic means in accordance with Act No. 480/2004 Coll., on certain information society services, as amended*

- LBM shall gather and process Data Subjects' personal data in the scope of – *name, surname, date of birth, address, phone number, e-mail address, nationality, interests, and size of clothing and footwear*, and shall do so on the basis of voluntarily granted consent to personal data processing only.
- Data Subjects may withdraw such consent to personal data processing at any time, either in person at LBM's address specified below or by written notification in paper form delivered using the contact details below. Withdrawal of consent shall not affect the legality of processing based on the consent prior to its withdrawal. Withdrawal of consent shall not affect personal data processing which LBM carries out on legal grounds other than consent (e.g. the performance of a contract or statutory obligations).

3. Who else will have access to your personal data?

Besides LBM and its employees, personal data may also be processed by partners of LBM in order to assure the above described purposes. LBM carefully selects external partners who, as processors, are allowed to process your personal data, and only entrusts personal data to those who provide a sufficient guarantee of suitable technical and organisational measures in order to prevent, in particular, accidental or unlawful destruction, loss, alteration, unauthorised disclosure of transmitted, stored or otherwise processed personal data, or unauthorised access to the data.

Other entities who may have access to your personal data are, or in the future may be:

- persons who ensure the technical operation of a certain service for LBM or technology providers which LBM uses for such services;
- persons to whom LBM provides data for the purpose of analysing and measuring sales activities;

- persons who deliver print titles, prizes or gifts to subjects as part of marketing campaigns;
- business partners who participate in the organisation of social and marketing events of LBM;
- law firms for the purpose of recovering debts due to LBM;
- persons who provide protection of persons and LBM's property via camera systems with recordings, which are located in individual shops.

Under applicable legislation, LBM is further required to hand over some of your personal data to entities such as state administration bodies, courts and law enforcement authorities in relation to potential administrative, criminal and civil court proceedings.

4. How long will we process your personal data for?

- LBM shall process your personal data for the duration of the contractual relationship and further for the absolutely necessary period for ensuring mutual rights and obligations ensuing from the contract.
- In the case of fulfilling legal obligations, LBM shall process personal data for the period stipulated by the applicable legislation.
- When processing personal data via camera systems, video recordings will be preserved for a maximum period of 7 calendar days. Should your personal data be captured on a video recording which must necessarily be used to resolve an offence or other security incident, the personal data will be processed together with the recording until the recording is handed over to the law enforcement authorities.
- In the event that LBM processes personal data on the basis of your consent, the personal data will be processed for the period specified in your consent, i.e. for a period of 5 years from the date on which your consent is granted or until you withdraw it.

5. What are your rights in relation to personal data processing by LBM?

As a Data Subject, you have the following rights in relation to your personal data:

- **The right to withdraw your consent to personal data processing at any time** (provided that processing is based on consent);
- **The right of access to personal data** (the right to request information as to whether or not LBM is processing personal data which concerns you; if this is the case, you have the right of access to such personal data and to other information pursuant to Art. 15 of the Regulation);
- **The right to data portability** (the right to obtain personal data which concerns you in a structured, commonly used and machine-readable format, and the right to transmit this data to another administrator. You also have the right to the assurance that the personal data is transmitted straight from one administrator to the other, as long as this is technically feasible);
- **The right to rectification** (the right to request that, without undue delay, LBM correct any inaccurate personal data which concerns you);
- **Right to restrict processing** (the right to request that LBM restrict processing if, among other things, LBM verifies the data because the right to rectification is exercised, or if LBM processes personal data unlawfully, but you do not wish to have it erased);

- **The right to erasure** (the right to request that LBM erase your personal data without undue delay if, among other things, the personal data is no longer required for the purpose for which it was collected, you withdraw your consent on the basis of which LBM has been processing your personal data and no other legal grounds for processing exist, or if LBM processes the personal data unlawfully);
- **The right to object;**
- **The right to address an initiative to the Personal Data Protection Office.**

6. How can you contact LBM?

Should you have any questions regarding the processing of your personal data or the enforcement of the above specified rights, you can contact LBM by letter at: Pernerova 676/51, Karlín, 186 00 Prague 8, or by e-mail at: informace@lbm.cz.