

Protection and processing of personal data

Processing of personal data

Dear Customers,

JVC Pulse s.r.o., the owner of The Edge On brand and the www.theedgeon.com website and provider of educational services (training, lectures, publications, consultancy or sale of services and products), is the data controller of the personal data of Jvc Pulse Clients pursuant to Article 4(7) of Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (General Data Protection Regulation) (hereinafter referred to as "**GDPR**").

JVC Pulse s.r.o. processes the personal data of clients from countries outside the European Union and the European Economic Area in accordance with the principles of the GDPR, which is a globally recognized standard for the protection of personal data. As our clients come from different countries around the world, we are committed to continuously checking and ensuring, as far as possible, that our practices also comply with any different requirements of local data protection laws. If a client becomes aware of any non-compliance of our practices with the laws of their country, please contact us immediately at team@theedgeon.com so that we can resolve the situation.

Identification and contact details of the administrator: JVC Pulse s.r.o., ID: 08259208, with registered office at Hvězdářská 514/10, Velká Chuchle, 159 00 Prague, registered in the Commercial Register maintained by the Municipal Court in Prague, Section C, Insert 315835. E-mail team@theedgeon.com . Tel: +420 737 545 921

JVC Pulse undertakes to process the personal data provided to it in accordance with the law, in particular the GDPR, in a fair, lawful and transparent manner, only to the extent necessary, and to protect the personal data processed in a manner appropriate to its importance and nature.

Personal data means any information about a designated or identifiable natural person – the Client or persons authorized by the Client to participate in JVC Pulse educational events; an identifiable natural person is a person who can be identified directly or indirectly, in particular by reference to a specific identifier, such as a name, identification number, location data, network identifier or to one or more specific elements of the physical, physiological, genetic,



psychological, economic, cultural or social identity of that natural person.

JVC Pulse uses the services of subcontracted data processors (e.g. web hosting providers) to process certain personal data. The processors are vetted for the secure processing of personal data. JVC Pulse enters into a personal data processing agreement with each processor, under which subcontractor has a duty of confidentiality in relation to personal data and is responsible for the proper security of the physical, hardware and software perimeter. A current list of processors is provided at the end of this Client Information.

Processing of personal data at the conclusion of the Contract

1. When placing an order, the Client is required to provide personal data that are necessary for the execution of the order – providing a subscription or creating a draft Contract for the Client, namely: the Client's name and surname, billing and delivery address, e-mail, or telephone contact to the Client, the type of service required (subscription or requested educational program). Without the provision of this personal data, JVC Pulse cannot provide the Client with the subscription, make the requested proposal for the Contract to the Client and conclude the Contract with the Client and subsequently perform these services.
2. The purpose of the processing of this personal data is the performance of the contract, the fulfilment of JVC Pulse's obligations under the law and the pursuit of JVC Pulse's legitimate interests:

Implementation of the customer's order – creation of the subscription, creation of the draft contract, implementation of the contract

- The legal basis for processing personal data is the performance of a contract pursuant to Article 6(1)(b) of the GDPR, or the processing of personal data at the request of the data subject before entering into a contract.
- The customer's personal information required for the purchase is entered by JVC Pulse into the Company's accounting software for posting. The accounting software provider, which is the processor of the personal data, backs up this data on its servers. The processor is obliged to handle the personal data in accordance with JVC Pulse's instructions in accordance with the GDPR.

Performance of JVC Pulse's obligations under the law in connection with the provision of services to the Client

- The legal basis for processing personal data is the fulfilment of the legal obligations of the controller pursuant to Article 6(1)(c) of the GDPR, in particular obligations relating to bookkeeping.

Fulfilling the legitimate interests of JVC Pulse

- The legal basis for the processing of personal data is the legitimate interest of the controller pursuant to Article 6(1)(f) of the GDPR.
- The purpose of processing personal data is JVC Pulse's legitimate interest in protecting its legal claims related to the provision of services to Clients, controlling the proper execution of the order and performance of the Contract and effective promotion of JVC Pulse's services.
- At some of our live events – courses and weekend stays, seminars, suburban camps ...

we take photographic documentation or video recording. We use the photos in promotional materials, especially on the website. You will never find the names of the participants in these materials, unless it is a reference, and then by written consent. If you would prefer not to be on the footage, please let us know on our contact details before the live event. We retain your personal data for the duration of the limitation periods, unless the law provides for a longer period to retain it or we have specified otherwise in specific cases.

- Following the execution of a Client's order made through the Portals, JVC Pulse is entitled to contact Customers by e-mail with offers of the same or similar services. It is also in JVC Pulse's interest to ascertain the satisfaction of Clients with the subscription purchased and the services provided through e-mail questionnaires or requests for evaluation.
 - The Client may refuse the sending of e-mail questionnaires and commercial communications and the processing of personal data for these purposes in advance in the process of ordering services.
 - The Client may opt-out of receiving email questionnaires and commercial communications at any time and object to the processing of personal data for such purposes by using the unsubscribe link contained in each such email. Such action will be deemed to be an objection to processing within the meaning of Article 21 of the GDPR and JVC Pulse will no longer send such emails to the Client.
3. JVC Pulse stores the Clients' personal data for the period necessary to exercise the rights and obligations arising from the contractual relationship between the Company and the Client and to assert claims arising from such contractual relationship (for the duration of the general three-year limitation period plus one year with respect to claims asserted at the end of the limitation period) and for the period necessary to fulfill the Company's legal obligations. After the expiry of these periods, the relevant personal data will be deleted. Personal data processed for the purpose of contacting clients via e-mail messages.
 4. In the case of an order for JVC Pulse services via the Portals, the processing of personal data by the Processor is further processed as set out below.

Processing of personal data when using the JVC Pulse website

5. JVC Pulse uses cookies and other network identifiers, which may be personal data, on its website to improve the quality of its services, personalize its offerings, collect anonymous data and for analytical purposes. By using the Company's website, the Client agrees to the use of the aforementioned technology. The Client can disable the storage of cookies in the settings of his/her internet browser.
6. The personal data provided by the Client via the website is processed on behalf of and under the instructions of JVC Pulse by the web hosting provider and website administrator. The purpose of the processing of this personal data is the execution of the Client's order and the exercise of the rights and obligations arising from the contractual relationship between JVC Pulse and the Client. The legal basis for the processing of personal data is the performance of the contract pursuant to Article 6(1)(b) of the GDPR and the fulfilment of the legal obligations of the controller pursuant to Article 6(1)(c) of the GDPR, or the consent granted pursuant to Article 6(1)(a) of the GDPR (cookies).
7. When you browse our website, we record your IP address, how long you stay on the site and which page you come from. We see the use of cookies to measure website traffic and



to customize the display of the website as a legitimate interest of our administrator, as we believe that this allows us to offer you an even better service. Cookies for advertising targeting will only be processed on the basis of your consent. Our website can also be browsed in a mode that does not allow the collection of personal data. You can disable the use of cookies on your computer in your internet browser.

8. There is no automatic individual decision-making by JVC Pulse within the meaning of Article 22 of the GDPR.

Your rights in relation to the processing of personal data

Please note that in connection with the processing of your personal data, you have the right to request from JVC Pulse access to, rectification or erasure of your personal data, or restriction of processing, the right to data portability and the right to object to the processing of your personal data. You also have the right to lodge a complaint with the supervisory authority, which is the Office for Personal Data Protection (www.uoou.cz).

Right of access to personal data (*Article 15 of the Regulation*)

You have the right to obtain confirmation from JVC Pulse as to whether or not personal data relating to you is being processed and, if it is, you have the right to access that personal data – JVC Pulse will provide you with a copy of your personal data processed upon request.

Right to rectification and erasure (*Articles 16, 17 of the Regulation*)

You have the right to have JVC Pulse correct or amend inaccurate personal data it processes about you.

You have the right to have your personal data erased by JVC Pulse if (i) it is no longer necessary for the purposes for which it was collected or otherwise processed, or (ii) you have objected to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or (iii) your personal data has been unlawfully processed, or (iv) the personal data must be erased to comply with a legal obligation under Union or Czech law.

Right to restriction of processing (*Article 18 of the Regulation*)

You have the right to have JVC Pulse restrict the processing of your personal data if:

- a) you deny the accuracy of the personal data processed about you for the time necessary for JVC Pulse to verify the accuracy of your personal data;
- b) the processing of your personal data is unlawful and you refuse the erasure of your personal data and instead request a restriction on its use;
- c) JVC Pulse no longer needs the personal data for the purposes of processing, but you require it for the establishment, exercise or defence of legal claims;
- d) you have objected to the processing pursuant to Article 21(1) of the GDPR for the time necessary to verify whether the legitimate grounds of JVC Pulse outweigh your legitimate grounds.

Right to data portability (*Article 20 of the Regulation*)

You have the right to receive your personal data that you have provided to JVC Pulse in a structured, commonly used and machine-readable format and the right to transfer such data



to another controller, and you also have the right to have such personal data transferred directly from one controller – JVC Pulse – to another controller, where technically feasible.

Right to object (*Article 21 of the Regulation*)

You have the right, on grounds relating to your particular situation, to object at any time to the processing of your personal data by JVC Pulse in order to protect the legitimate interests of JVC Pulse (see Purposes of Processing). In this case, JVC Pulse will no longer process your personal data unless it can demonstrate compelling legitimate grounds for the processing which override the interests or rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

Right to lodge a complaint with the supervisory authority (*Article 77 of the Regulation*)

You have the right to file a complaint with the Office for Personal Data Protection if you believe that the processing of your personal data violates the GDPR.

List of processors

- JVC PULSE s.r.o.
- Active24