

# **PRIVACY STATEMENT OF ROSA OLYMPIA ESTRELLA DANCE & MOVEMENT STUDIO**

Version 1.01 of 15.5.2018

This Privacy Statement explains the collection and further processing of personal data by Rosa Olympia Estrella Dance & Movement Studio (hereinafter called ROEDMS) for itself. The term 'personal data' refers to any information relating to an identified or identifiable person.

## **1. BRIEF OVERVIEW**

ROEDMS mainly process personal data for current, past and future clients of the studio as it pertains to the information of courses, registration processing and the offering of additional services, all of which are provided by ROEDMS studio on an exclusive basis.

The present Privacy Statement covers processing of Data by ROEDMS.

## **2. SUMMARY: DATA PROCESSING BY ROE**

ROEDMS core service consists of providing dance and fitness instruction to adults and children. In addition ROEDMS organizes events and activities related to our field of service. We offer the possibility for students to register online, and we process those registrations. This also includes sending out newsletters and other information in our name only. ROEDMS also collects data through a variety of events and promotions.

ROEDMS performs the following data processing:

Course, Workshop and Camp enrollments are normally done via our websites online enrollment forms by the student directly, but it can also be done by family members (e.g, parents in the case of children). ROEDMS needs this data to provide services and all data collected is used for internal archiving purposes.

### **3. CONTROLLERS, CONTACT INFORMATION**

Regarding the collecting and processing of personal data in our online enrollment system, and its integration into our communication service providers. Rosa Olympia Estrella Dance & Movement Studio, Vlasska 349/15, 11800 Praha, acts as controller. Particularly as defined in Art. 4 Section 7 of the European General Data Protection Regulation (GDPR), insofar as the respective provisions apply in the specific case. The communication vehicles used as third party platforms (e.g. Mailchimp and Evite and our personalized Webmail and Facebook,) process data related to the dissemination of information by ROEDMS. ROEDMS provides the basic necessary data to conclude and implement the communication and distribution of information. The present Privacy Statement does not include any additional information about data processing by these third parties.

ROE itself has not appointed a data protection officer as referred to in Art. 37 GDPR, as none is required. Any privacy-related enquiries, claims or information related to the data that ROEDMS processes in its own name may be sent via email or in writing to ROEDMS. Customers and recipients of our communications can also manage their consents online by opting out of any undesired communications.

Insofar as ROEDMS falls within the scope of application of the GDPR, it has appointed a representative in accordance with Art. 27 GDPR: General Manager, ROEDMS, Vlasska 349/15, 11800 Praha, Czech Republic.

## **4. COLLECTING, PROCESSING AND USING PERSONAL DATA**

### **4.1 DATA SUBJECTS**

ROEDMS collects and processes personal data pertaining to:

- Dance Students
- Student contact persons in case of emergencies
- Users of the website
- Recipients of the newsletters and marketing mailings
- Persons who communicate with ROEDMS via e-mail, telephone or otherwise, such as via contact from the website.
- Via Social Media platforms (e.g. Facebook, Instagram...)

### **4.2 DATA SOURCES**

The personal data are generally collected from the respective persons themselves, for instance, by a person registering for a course or registering for a newsletter. However, they may also be collected via third parties, for instance when students are registered by a family member, friend, sports club or school and an entry is established in his name. ROE assumes that in this case any third parties are authorized by the data subject to do so on his behalf. Otherwise, the data subject may have his information and consents pertaining to the data applications corrected after the fact or may correct and manage them himself by unsubscribing to any notifications and notifying us of any corrections.

### **4.3 COLLECTED DATA**

The following categories of data are collected:

- Students personal data and contact information, such as salutation, first name, last name, in some cases age (as pertaining to children), email address, mobile phone number.
- Data related to registration for, participation in one of our courses, events internal or external. Such as events for which a person has registered, links to photos and videos of students issued through a third-party provider, emergency contact.
- Data related to newsletters and promotional offers and other services, such as opt-ins and opt-outs regarding the newsletters, as well as opt-ins and opt-outs for promotional offers and other services.
- Text message recipients for the text message in communicating course offers and pertinent information related to programs registered for on our systems.
- Data related to linking via social networks (e.g., Facebook), such as the profile photo and other data in accordance with the settings of the Students.
- Data pertaining to remote access users such as name, email address and language.
- Data related to communication, such as records of correspondence and communication with ROEDMS, requests for quotes, etc.

- \* These are the minimum data required for concluding the agreement with ROEDMS, as applicable. Without these data, it is impossible to participate in our programs or attend our courses, as applicable (particularly the “Online Registration”). The other data are partially necessary in order to utilize certain additional services provided by ROEDMS.

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#### **4.4 CHILDREN**

If children (under 16 years of age) actively participate in our programs and courses, their data, too, are generally processed to the same extent as the data of other students and users. These data are normally collected via the parents or legal guardians, as applicable, or (with their consent) via a sports club, school or external event sign up sheet.

### **5. PURPOSE OF PROCESSING PERSONAL DATA**

#### **5.1. PURPOSE OF COLLECTING AND PROCESSING OF PERSONAL DATA BY ROE**

Insofar as ROEDMS collects and processes personal data as a controller, it does so to the extent permitted by applicable law, particular (but not exclusively) for the following purposes:

- For purposes of contracting for and providing services for dance and fitness students (adults and children), particularly for the setup, maintenance and updating of registration information, for the account management and for providing data at the time of registration for one of our courses or events, in order to facilitate individual registrations.

- For the linking to students accounts, to social media platforms (e.g. Facebook)
- For advertising and marketing, particularly sending out marketing mailings as well as sending out newsletters and communications of ROEDMS
- For purposes of fulfilling the applicable legal requirements and internal rules of ROEDMS, pursuing and implementing various rights, asserting and defending against legal claims and complaints, combating abuse, and for purposes of legal investigations or proceedings related to answering enquiries from authorities,
- For individual communication with users of ROEDMS services, e.g. enquiries and complaints and responding to same.
- The sale or purchase of companies and other corporate transactions and the associated transfer of user data.
- For other purposes, where a legal duty requires the processing or where these purposes were evident or appropriate based on the circumstances at the time data collection.

## **5.2. LEGAL BASES OF DATA PROCESSING**

ROEDMS, in its role as controller, processes the aforementioned personal data on the following legal bases:

- Conclusion and fulfillment of ROEDMS's agreements with clients, organisers, students and the users of ROEDMS's products and services.

- Conclusion and fulfillment of agreements with third parties made by users of the “Online Registration” system for course and event enrollments.
- Compliance with legal requirements by ROEDMS.
- Consent of students (directly or via their authorized representatives), as applicable, of newsletters and marketing communications.
- Consent of persons with whom permanent cookies are used.
- Consent of employees for whom data is collected for employment purposes.
- Legitimate interests of ROEDMS and other parties.
- Operation of the website and other systems by ROEDMS.
- Implementation, evaluation and documentation of the event or course, as well as future events and courses.
- Carrying out advertising, marketing and public relations work.
- Maintenance and secure and efficient organization of the business, including a secure and effective operation and the successful continuing development, and enhancement of new services, as well as of the website.
- Sound business management and development.
- Successful acquisition or sale of companies, as well as corporate transactions.

- Interest in preventing fraud, abuse, crimes and other offenses, as well as in the investigation of such offenses and other inappropriate conduct, handling of legal complaints, claims and other actions against ROEDMS, involvement in legal proceedings and cooperation with the authorities, and otherwise asserting, exercising and defending legal claims.

## **6. DATA DISCLOSURE AND DATA TRANSFER ABROAD**

The personal data processed by ROE on its own behalf may be transferred to the following categories of recipients to the extent permitted by applicable data protection law:

- To ROEDMS or the respective organizer, as applicable (mutual exchange of the data kept by both parties, e.g. template for event registrations generated by Registrations and transfer of data for storage therein.
- Businesses and organizations that offer their products and services via ROEDMS
- Photo services and other providers, as well as other organizers.
- Associations, clubs, schools, other approved associations and organizations.
- Parent, respectively legal guardians and representatives of students.
- Local, national and foreign authorities.
- Media organisations.

- Text messaging
- Persons invited by current students or their guardians to receive information from ROEDMS.
- Processors (including IT service providers, payment service providers, providers for the transmission of text messages, providers for combating fraud, advertising partners, website analysis services).
- Operators of social networks.
- Providers of tools for analyzing website usage, which may also use the data for their own purposes.
- The public, including visitors to ROE website, and our Registration systems.
- Buyers or parties interested in acquiring the company or in other corporate transactions.
- Other parties to potential or actual legal proceedings.

The information accessible on ROEDMS's website is available worldwide; furthermore, the recipients of services sent via email and text messages or apps on other channels, and associated data may be located anywhere in the world and are not necessarily subject to data privacy laws. In this case, ROEDMS, does not take any additional precautions regarding data privacy but rely, insofar as an international disclosure of personal data wishing the meaning of the law has even occurred, on the exception of consent, or of the initiation and execution of an agreement, or the justification that the data were published by the data subject himself.

Furthermore, the data subjects have to assume that their personal data may otherwise be transferred to any country in the world, particularly to all countries in which the respective organizers are located or process their data or in which ROEDMS's service providers are located. ROEDMS can not ensure adequate protection, particularly based on the EU model clauses, in countries lacking adequate data protection. ROEDMS is under no obligation to warrant or ensure that third party organizations, companies or social media providers comply with data protection.

## **6. DATA RETENTION**

Unless otherwise provided by law, ROEDMS generally stores the personal data processed as part of the service on its own behalf with no specific time limit unless reasons exist for earlier deletion. This is the case if the data are no longer needed or if ROEDMS, as the case may be, is required to delete such data. The student terminates their participation in courses or programs administered by ROEDMS, the persons's master data remain indefinitely unless their deletion is expressly requested by a student.

Business documents, including correspondence, are retained for as long as ROEDMS, as applicable, has a legitimate interest in them (particularly an evidentiary interest in any claims, documentation of compliance with certain legal or other requirements, an interest in an evaluation of non-personal data) or is obligated to do so (by contract, law or based on other requirements). Data from requests made via email or our website can generally be retained permanently. Legal duties regarding, for instance, the early deletion or anonymisation or pseudonymisation of the data, are reserved.

## **7. COOKIES AND GOOLGE ANAYLTICS**

ROE utilizes cookies on the website. Cookies are a widespread technology in which the browser of the website user is assigned and identifier that the browser stores locally and exhibits upon request. On the one hand, ROEDMS utilizes session cookies, which are automatically deleted once the user leaves the website and are used for purposes of enabling the server to maintain the connection to the user, as the user pages through the website. On the other hand, ROEDMS also uses permanent cookies, which are only deleted after a period specified for each website (e.g. two years after the last visit) and are used for the purposes of storing the users default settings (e.g. language) over multiple sessions or to enable automatic logins, tracking), the user agrees to the use of such permanent cookies. The user of a website can block the use of cookies in his browser or delete them there, but this could potentially affect use of the website.

ROEDMS may utilize Google Analytics or similar services on its website. This is a service provided by a third party, which may be located in any country in the world (in the case of Google Analytics, the provider, Google Inc., is headquartered in the USA, [www.google.com](http://www.google.com)). It allows ROEDMS to measure and analyze the use of its website. This is also accomplished by using permanent cookies, which this service provider implements.

The service provider does not receive any personal data from ROEDMS (and does not retain any IP addresses) but can track the user's utilization of the website, combine this information with data from other websites that the user has visited and that are also tracked by the service provider, and use these findings for its own purposes (e.g., directing placement of advertising). If the user himself has registered with the service provider, it knows his identity. His personal data are then processed by the service provider under its authority and in accordance with its privacy policy. ROEDMS receives non-personal information from the service provider concerning the use of the website.

## **8. RIGHTS OF STUDENTS, THE USER AND OTHER DATA SUBJECTS**

Every data subject has the right to be informed about his data and can request information about them and demand that they be corrected. Moreover, every data subject has the right to request the deletion and restriction of the use of his personal data by ROEDMS and refuse such processing of his personal data. If the processing of the personal data is based on a consent, the consent may be revoked by the data subject at any time.

In countries of the EU or the EEA, as applicable, the data subject has, in certain cases, the right to receive the data generated through the use of online services in a structured, common and machine-readable format that permits the further use and transmission of the data.

Enquiries concerning these rights should be addressed to the contact person (see section 3 above). ROEDMS reserves the right to restrict the rights of the data subject in accordance with applicable law and, e.g. not to issue complete information or not to delete data.

If ROEDMS takes an automated decision regarding an individual person that has legal or similar significant effects on the data subject, the data subject may speak with a responsible person at ROEDMS and request reconsideration of the decision or that the decision be taken by a person from the outset, to the extent provided by applicable law. In this case, it is possible that the data subject will no longer be able to use certain automated services.

## **9. CHANGES TO THE PRIVACY STATEMENT**

ROE may modify the present Privacy Statement on its own behalf at any time without prior notice or announcement. The current version published on the website [www.rosadanza.cz](http://www.rosadanza.cz) shall apply.