

Information on the processing of personal data for users and contractual partners

Dear users and contractors,

The General Data Protection Regulation (GDPR)¹, which came into force on 25 May 2018, imposes a number of obligations on us regarding the protection of your personal data. You can be sure that we place the utmost importance on compliance with these obligations, which is why we provide you with the following key information regarding the processing of your personal data.

1. What data do we process?

In your case, the controller OSA, z.s. (hereinafter referred to as "OSA") processes some or all of the following personal data contained in the license application, in the contract concluded between you and OSA, obtained in the course of collective administration, in communication with you or obtained through your account in the OSA E-shop:

- identification data: name and surname, business name, company registration number, VAT number, date of birth, signature, (similarly also name, surname and contact details of members of the legal entity's statutory bodies);
- contact details: home/permanent address, business address, delivery address, e-mail address, telephone contacts, data box ID;
- other data (e.g. subject of business, bank account number, data on the performance of the contract, including data on financial and non-financial transactions between OSA and you, etc.);
- access data to your account in the OSA E-shop;
- IP address of the E-shop user's connection;
- data obtained in the course of collective management or contract performance (e.g. if an audio or video recording is made on your premises as part of an inspection of the use of protected works or other protected subject matter, the likeness or voice of the user or other persons present may exceptionally be recorded incidental to the protected works/reproduction devices to the extent necessary, only if the recording of the protected subject matter/reproduction devices cannot be separated from the recording of the persons present;
- records of telephone calls with the OSA Customer Service Line and/or Apollon's virtual assistant (voicebot).

2. On what basis, for what purpose and for how long do we process your personal data?

The provision of your personal data to OSA is voluntary, but without it it would not be possible to conclude or perform the contract between you and OSA. The purpose of the processing of personal data is the exercise of the collective management of copyright in musical works and/or the performance of the contract. In the event that you provide your data in the context of reporting or discovering the use of musical works or other protected subject matter, and in the absence of a licence agreement, OSA processes your data for the purposes of fulfilling its legal obligations in the exercise of collective management and for the purposes of pursuing the legitimate interests of OSA and the right holders concerned. When sending newsletters to users of musical works and contractual partners,

OSA processes your personal data for the purpose of communicating up-to-date information about the services provided in the exercise of collective management and other marketing information on the basis of the legitimate interest of OSA. (You can simply unsubscribe from the newsletter in the manner indicated in the respective message.) On the basis of legitimate interest for the improvement and efficiency of its services, OSA records telephone conversations of users, contractual partners or other persons with the Customer Line and Apollon's virtual assistant and keeps the recordings for one month, or longer in justified cases.

The processing of your personal data by OSA is also necessary to comply with OSA's legal obligations under specific legislation - in particular accounting and tax legislation. With regard to the above purpose of processing personal data, we process your personal data for the duration of the contract between you and OSA and then, after this period, only for the period of time that results from the relevant legal regulations (here, in particular accounting and tax regulations). After this period, your personal data will be destroyed, except if it is needed for the purpose of exercising or protecting your rights or the rights of OSA in disputes, court, arbitration, criminal or

¹ 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 (General Data Protection Regulation)

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administrative proceedings, in which case we will retain your personal data for the duration of the dispute, solely for the purpose of protecting your rights in such dispute. In the event that unauthorized use of copyrighted subject matter is found, the data is retrieved from publicly available sources for the sole purpose of enforcing claims under copyright law and in accordance with the principle of due care and protection of the rights entrusted to us.

3. To whom do we disclose or transfer your personal data?

As part of the performance of the contract with you and the exercise of collective administration, OSA also transfers your personal data to entities providing support activities for OSA - mailing, communication about obligations, debt collection, or legal services. OSA continuously changes and adds to the entities providing the above activities in light of the following updates and changes, OSA is prepared to provide you, upon your written request, with an up-to-date list of such entities for which disclosure and transfer of your above information may be considered.

The OSA also transfers your personal data for the purpose of collective rights management and protection of the rights entrusted to it (exercising the legitimate interests of the OSA and the right holders concerned) to certain other collective rights managers for whom it performs rights management on the basis of mutual mandates resulting from agreements concluded pursuant to Section 97g of the Copyright Act. In response to your written request, the OSA is ready to inform you of the entities for which disclosure and transfer of your aforementioned data may be considered. In the event of a request (by a government authority), OSA is obliged to disclose or transfer your personal data to the relevant government authorities authorised to conduct the individual proceedings (in particular tax, enforcement, insolvency or criminal proceedings) described above, exclusively in cases where OSA is obliged to do so on the basis of applicable legislation.

4. Your rights under current legislation

We would also like to inform you that you have the following rights under the current data protection legislation:

- the right of access to the personal data processed by OSA in your case;
- the right to have your personal data corrected if it is incorrect or inaccurate in any respect;
- in the event that you become aware or believe that OSA is processing your personal data in a way that is contrary to the protection of your private and personal life or contrary to the law, in particular if your personal data would be inaccurate with regard to the purpose of their processing, you have the right to request OSA for an explanation and to request that OSA remedy the situation (e.g. by blocking, correcting, supplementing or destroying your personal data);
- the right to request OSA to erase personal data or to restrict their processing;
- the right to object to processing in order to assess whether there has been a breach of the obligations imposed on OSA by applicable law;
- the right to data portability;
- in addition to the above, you also have the right to lodge a complaint with the supervisory authority, which is the Office for Personal Data Protection, located at Pplk. Sochor 27, 170 00 Prague 7.

In case of any uncertainties or questions regarding the processing of your personal data, you can contact us at any time in writing at OSA, z. s., Čs. Armády 20, 160 56 Prague 6, delivery address.

The document Information on the processing of personal data for users and contractual partners is valid from 17 July 2024 and replaces its previous version. This document may be updated and modified by the controller, for example, if the purposes or legal titles of the processing, its contact details, etc. change.