

INFORMATION ON THE PROCESSING OF PERSONAL DATA

INTRODUCTION

Our company **TCM.golf s.r.o.**, Company ID No.: 09038566, with its registered offices at Ladova 389/10, Hejčín, 779 00 Olomouc, registered in the Commercial Register under file no. No. C 81685, maintained at the Regional Court in Ostrava, is the holder of intellectual property rights to the application Bryson, the main purpose of which is to help our business partners, i.e. sports clubs and youth training centres, with the agenda of training programmes for players (hereinafter referred to as the **“Application”**). Your personal data is processed within the Application.

Your personal data is processed as an administrator by our business partner, the company Österr. Golf-Verband, Company ID No.: 088295100, with registered offices at Marxergasse 25, 1030 Vienna, file No. ref. in the Commercial Register: ZVR: 088295100 (Zentrales Vereinsregister) maintained at Landespolizeidirektion in Vienna (hereinafter referred to as the **“Administrator”**), which informs you, through our company, of the processing of your personal data.

This document contains detailed information on the processing of your personal data by the Administrator, within the meaning of Articles 13 and 14 of the Regulation of the European Parliament, and of the Council (EU) 2016/679 of 27 April 2016, on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (general directive on the protection of personal data, hereinafter referred to as the **“GDPR”**), in particular:

- **what personal data the Administrator processes;**
- **for what purpose and for how long your Administrator processes your personal data;**
- **what your rights are and how you can exercise them.**

OVERVIEW OF BASIC TERMS

Below, for the sake of clarity, we present a brief overview of the basic terms that apply to the processing of personal data:

PERSONAL DATA - any information about a natural person (data subject, in this case the Application User) from which the data subject is identified or identifiable, either directly (from the data itself) or indirectly (in connection with other data available to the controller), for example, the name, identification number, location data, network identifier, or one or more specific elements of the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

PROCESSING OF PERSONAL DATA – any operation or set of operations that is performed on personal data or personal data files with or without automated procedures, such as collecting, recording, organizing, structuring, storing, adapting or modifying, retrieving, viewing, using, transmitting, disseminating, or any other access, alignment, or combination, restriction, deletion, or destruction.

ADMINISTRATOR – the Administrator is a person (natural or legal), public authority, agency, or other entity that alone or together with others determines the purposes and means of personal data processing.

PROCESSOR – the processor is a person (natural or legal), public authority, agency, or other entity that processes personal data for the controller.

RECIPIENT – the recipient is a person (natural or legal), public authority, agency, or other entity to which personal data is provided.

PROFILING – any form of automated processing of personal data, consisting in its use to assess certain personal aspects relating to the data subject, in particular, to analyze or estimate aspects relating to his or her performance, economic situation, state of health, personal preferences, interests, reliability, behaviour, place, where it is located, or movement.

PRINCIPLES, POLICIES, AND PROCEDURES FOR THE PROCESSING OF PERSONAL DATA

When processing your personal data, the Administrator follows the following policies and procedures:

- Processes your personal data correctly, in a lawful and transparent manner;
- Processes your personal data only for the purposes described in this document, and only to the extent necessary for the fulfilment of such purposes;
- Always considers your personal data to be true, accurate, and up-to-date; in the event of any change to your personal data, you are hereby requested to update it;
- Processes your personal data only for the time necessary to fulfil the purposes of the processing, as specified below in this document;
- Protects your personal data in such a way that it is not used unauthorized or made available to persons who are not authorized to process it, or that there is no other breach of the security of your personal data;
- the processing of your personal data does not involve decisions based solely on automated processing, including profiling, which would have legal effects for you or similar effects that would significantly affect you in a similar way;
- The administrator has duly selected his processor, as further set out in these terms and conditions, to prevent the misuse of your personal data.

CATEGORIES OF PERSONAL DATA PROCESSED

1.1. To register in the Application, you must communicate your personal data to the Administrator (authorized person of the Administrator, e.g. coach, receptionist, etc.), in the range of name, surname, e-mail address. If the child player does not have their own e-mail address, they will provide the e-mail address of their parents, or one of the parents. Based on this personal data, you will receive an e-mail from our company with a link to create a user account (hereinafter referred to as the “**Account**”). After clicking on the link in question, you will be prompted to choose your own password for access to the Account. To complete the registration and create an Account, you must enter your chosen password, and then click on the “complete registration” field.

1.2. After creating the Account, it is necessary to enter additional data into the Application - some of this are mandatory, other information is optional:

1.2.1. Mandatory data:

1.2.1.1. The address of residence of the player;

1.2.1.2. Telephone number of the player, if the player is a child and does not have his own number, then the telephone number of the child’s parent or parents;

1.2.1.3. Date of birth of the player;

1.2.1.4. Birth ID number birth of the player;

1.2.1.5. Data on how the player played in the tournament and their results.

1.2.2. The player or parent of the child, if the player is a child, may also fill in the following data within the Application:

- 1.2.2.1. Player laterality (whether left- or right-handed);
- 1.2.2.2. The size of the player's clothes and shoes;
- 1.2.2.3. Weight and height of the player;
- 1.2.2.4. Photograph of the player;
- 1.2.2.5. Photographs and videos from the players training sessions or tournaments;
- 1.2.2.6. Details of how the player played the tournament and their progress;
- 1.2.2.7. Data on the dates of training sessions, player tournaments, or other events conducted within the Application;

Failure to fill in the above data in paragraph 1.2.2. of this document does not prevent you from using the features of the Application.

1.2.3. If the user is the parent of the child, he/she must fill in further within the Application:

- 1.2.3.1. Parent's telephone number.

1.3. The Deputy Administrator (in particular, the coach) may also enter the following player data within the Application:

- 1.3.1. Analysis of the player's game and other evaluations by the coach;
- 1.3.2. Comments on photos and videos from the player's training sessions or tournaments.

1.4. If the parents are not interested in being informed about the course of training sessions, child tournaments, and other events related to the child, they do not have their own Account within the Application, and their data does not have to be entered, unless the child does not have their own contact details (i.e. telephone number and e-mail address); then the e-mail address and telephone number of the parents, or at least one of the parents, must be filled in.

1.5. We obtain the player's personal data directly from the player when he communicates this data for the purpose of registration and use of his Account within the Application. We obtain personal data of children directly from children, or from their parents, and the personal data of parents is obtained by the Administrator directly from parents at the moment when they communicate this data to him/her for the purpose of registration and use of his Account within the Application.

1.6. The Administrator also declares that the rights to all personal data processed within the Application (especially videos and photos from the player's training sessions and tournaments, and the coach's comments on them, analysis of the player's game, and other evaluations by the coach), belong to the player, including the right to their portability under Article 20 of the GDPR, regardless of whether it was entered into the Application by a player, his/her parent, or a third party (e.g. a coach).

1.7. Furthermore, the Administrator obtains data from other sources, which publish tournaments results data on its website.

PURPOSE, LEGAL BASIS, AND TIME OF PROCESSING

PURPOSE OF PROCESSING

2.1. **The Administrator processes your personal data, which is filled in your Account, for the following purposes:**

- 2.1.1. providing performance based on the conditions of use of the Application, and enabling the use of the functions of the Application. Functions of the Application are described in detail in the Application Knowledge base integrated to the application.
- 2.1.2. settlement of any claims between you and the Administrator arising from the use of the Application;
- 2.1.3. fulfilment of obligations for the Administrator arising from legal regulations;
- 2.1.4. handling of your requests, suggestions, or complaints.

The Administrator cannot process your personal data for purposes other than those mentioned above.

2.2. Provision of performance based on the conditions of use of the Application includes the following activities:

- 2.2.1. the creation of year-round tournament and training calendars for players by the coach or Administrator, as part of this activity you (and/or the child's parent) will receive an e-mail notification in case of a training session, tournament, or other event from the Application;
- 2.2.2. the creation of an individual training plan for the player by the coach with data on the scope and repetition of the player's training, etc., within this activity, a so-called training diary is created;
- 2.2.3. generating statistics about the player after each tournament by entering data on how the player played the tournament and its course, by you and/or parents, based on this activity, the coach can create an analysis of the player's game or other evaluation by him;
- 2.2.4. enabling communication between you and the coaches, in which it is possible to share various photos and videos, analysis of the player's game by the coach, etc.

LEGAL BASIS OF PROCESSING

- 2.3. The Administrator processes your personal data in order for you to use the functions of the Application, based on your acceptance of the Terms of Use of the Application. The terms of use of The Application constitute the legal basis for processing.
- 2.4. Optionally entered data (specified in paragraph 1.2.2. Of this document) is processed by the Administrator on the basis of your consent, which you grant at the time of entering the data into the Application. You may revoke this consent at any time by deleting data from the Application, without prejudice to the lawfulness of processing based on the consent given prior to its revocation. You can delete the data from the Application at any time yourself, or you can also contact the Administrator with a request to delete the data. By granting consent to the processing of voluntarily entered personal data of the player, i.e. the moment of entering the data into the Application, the player also agrees that this personal data in the Application is made available to his parents, if the player is a child, and to the coach.
- 2.5. Consent to the processing of personal data is granted by the child himself, provided that he has reached the age of 15. If the child is under 15 years of age, consent to the processing is granted by the child's parent and the child, provided that he or she is intellectually and freely advanced to understand the content of this document and grant consent, otherwise only the parent. If the consent is given by a child under the age of 15 who is unable to understand the content of this document, the Administrator will delete such information, and will require that the child's parent give consent to the processing in such a case. If you consider that the consent of the Administrator was given by a child under the age of 15 without a sufficient understanding of the content of the document, please contact the Administrator by e-mail on oegv@golf.at to remedy this situation.

- 2.6. By granting consent to the processing of the child's personal data by the parent, the parent also declares that he or she is entitled to grant such consent on behalf of the child, or has the consent of the other parent, if necessary.
- 2.7. The Administrator further processes your personal data for the purpose of settling any claims arising from the use of the Application, on the basis of the administrator's legitimate interest in the protection of his/her rights.
- 2.8. Processing for the purpose of fulfilling the obligations arising for the Administrator from legal regulations is necessary for the fulfilment of the legal obligations that apply to the Administrator.
- 2.9. The Administrator also processes your personal data in order to be able to handle your requests, suggestions, or other complaints (i.e. players and parents), based on his/her legitimate interest in processing your request in accordance with legal regulations.

PROCESSING TIME

- 2.10. The Administrator processes your personal data for the time necessary to fulfil the purposes of their processing, which we have described above. If the Administrator loses its purpose and legal basis, then he/she is no longer entitled to further process your personal data.
- 2.11. In the case of providing performance based on the Terms of Use of the Application and enabling the use of their functions, the Administrator processes your personal data until the child reaches the age of 23, or until you cancel your Account within the Application in accordance with the Terms of Use.
- 2.12. Subsequently, the Administrator processes your personal data for a period of 10 years. This period is used to fulfil the legal obligations of the Administrator, and to settle any claims between you and the Administrator, and is also related to the operation and technical maintenance of the Administrator's systems and the Application.
- 2.13. Your personal data, which is processed on the basis of your consent, i.e. the data referred to in paragraph 1.2.2. of this document, is also processed for a period of 10 years from reaching the age of 23 of the child, or from the cancellation of the Account within the Application in accordance with the Terms of Use of the Application, but always only until you revoke your consent to processing. By revoking your consent, i.e. by deleting optionally entered data from the Application, the Administrator can no longer process such data.
- 2.14. For the purposes of processing your requests, suggestions, or complaints, the Administrator processes your personal data for the time necessary to process them, including the time required to prove that they have been processed in accordance with legal regulations.

RECIPIENTS OF YOUR PERSONAL DATA

- 3.1. Your personal data is processed by the Administrator or the processor, or the processor authorized by the Administrator to process personal data. For this purpose, the Administrator provides your personal data or part of this to processors as one of the categories of recipients of personal data. The processors are:
 - 3.1.1. our company TCM.golf s.r.o.
- 3.2. All obligations of the Administrator in relation to the processing of your personal data always apply to the processor authorized by the Administrator.
- 3.3. Other recipients of the player's personal data are:

- 3.3.1. the player's parents if the player is a child;
- 3.3.2. the player's coaches; and other persons authorized by the licensee of the application.

SECURING YOUR PERSONAL DATA

- 4.1. The Administrator applies appropriate technical and organizational measures to ensure the protection of your processed personal data to prevent unauthorized or accidental access to your personal data, its alteration, destruction, or loss, unauthorized transfers, its other unauthorized processing, as well as other misuse, of personal data. To this end, the Administrator has chosen, in particular, appropriate technical measures and pre-established procedures, the observance of which it controls and checks.

YOUR RIGHTS ARISING FROM THE PROCESSING AND APPLICATION OF PERSONAL DATA

OVERVIEW OF RIGHTS

- 5.1. **In connection with the processing of your personal data, you have the rights arising from Articles 15 to 22 and 77 of the GDPR, which you can assert against the Administrator. These rights are:**
 - 5.1.1. the right to access your personal data;
 - 5.1.2. the right to correct your personal data;
 - 5.1.3. the right to delete your personal data;
 - 5.1.4. the right to restrict the processing of your personal data;
 - 5.1.5. the right to the portability of your personal data;
 - 5.1.6. the right to object;
 - 5.1.7. the right not to be the subject of a decision based solely on automated processing, including profiling, which has legal effects for you or significantly affects you in a similar way;
 - 5.1.8. the right to lodge a complaint with the supervisory authority.

RIGHT OF ACCESS TO PERSONAL DATA

- 6.1. You have the right to receive information from the Administrator on whether they process your personal data. If they process your personal data, you also have the right to receive information from the Administrator about:
 - 6.1.1. the purposes for which they process your personal data;
 - 6.1.2. what categories of personal data concerned are;
 - 6.1.3. recipients of your personal data, i.e. whether they pass on your personal data to someone, especially about recipients from countries outside the European Union or in international organizations; in the event of a transfer to a third country or international organization, you have the right to be informed of the appropriate safeguards under Article 46 of the GDPR;

- 6.1.4. the planned period for which he will keep personal data, or the criteria for determining this period;
 - 6.1.5. the right to correct, delete, or restrict the processing of your data, or the right to object to such processing;
 - 6.1.6. the right to lodge a complaint with the supervisory authority, which is usually the Office for Personal Data Protection;
 - 6.1.7. all available information on the source from which he obtained your personal data, if he did not obtain it directly from you;
 - 6.1.8. whether automated decision-making takes place, including profiling and information on the procedure used, as well as the significance and expected consequences of such processing for you.
- 6.2. You have the right have a copy sent to you of your processed personal data. A copy is provided free of charge. Please note that the Administrator is already entitled to charge a reasonable fee for additional copies that you repeatedly request. Its amount will correspond to the administrative costs they incur.

RIGHT TO THE CORRECTION OF PERSONAL DATA

- 7.1. All data is processed in good faith, and every effort is made to keep the data accurate and up-to-date. However, due to error, your processed personal data may be inaccurate. In such a case, you have the right to request the Administrator to correct or supplement your inaccurate personal data.

RIGHT TO THE DELETION OF PERSONAL DATA

- 8.1. You have the right to request that the Administrator delete your personal data that they process. They are obliged to comply with your request if:
- 8.1.1. Your personal data is no longer needed for the purposes for which it was collected or otherwise processed;
 - 8.1.2. you withdraw your consent if your personal data have been processed on the basis of it, but only if there is no other legal basis for the processing;
 - 8.1.3. you object to processing based on a legitimate or public interest, but only if there are no overriding legitimate reasons for processing, or if you only object to processing for direct marketing purposes (if your personal data is processed for this purpose);
 - 8.1.4. Your personal data is processed by the Administrator illegally;
 - 8.1.5. Your Personal Data must be deleted by the Administrator in order to fulfil the legal obligation stipulated by the legal regulations of the Czech Republic or the European Union as a personal data administrator;
 - 8.1.6. you are 15 years of age or older, and your personal data has been collected in connection with the offer of information society services on the basis of your consent, or on the basis of the consent of your legal representative, if you are under 15 years of age.

- 8.2. Please note that there are exceptions to the above obligations. The administrator is not obliged to delete your personal data, even though he would otherwise be obliged to do so, when processing is necessary:
- 8.2.1. to fulfil a legal obligation requiring processing under the law of the Czech Republic or the European Union, which applies to him/her as an administrator, or to fulfil a task performed in the public interest or in the exercise of public power, which he/she would be entrusted as an administrator;
 - 8.2.2. for the determination, exercise or defence of legal claims;
 - 8.2.3. and for other reasons contained in Article 17 (3) of the GDPR.
- 8.3. Please note that in other cases, the Administrator is not obliged to delete your personal data processed by him/her.

RIGHT TO RESTRICT THE PROCESSING OF PERSONAL DATA

- 9.1. You have the right to request the Administrator to restrict the processing of your personal data. He is obliged to comply with your request if:
- 9.1.1. you deny the accuracy of the personal data processed for the time necessary to be able to verify their accuracy;
 - 9.1.2. the processing of your personal data is illegal, and instead of deleting personal data, you only request restrictions on their use;
 - 9.1.3. they no longer need your personal data for processing purposes, but you request it to determine, enforce or defend legal claims;
 - 9.1.4. you have raised an objection to processing based on a legitimate interest, thereby limiting the processing of your personal data until they verify that its legitimate reasons outweigh your presented objection.
- 9.2. During the period for which the processing of your personal data will be limited, they will process your personal data only on the basis of your consent to such processing. Please note that even without your consent, they are entitled to have your personal data stored, processed for the purpose of determining, exercising, or defending legal claims for the protection of the rights of another natural or legal person, or for the important public interest of the European Union or its Member States.

RIGHT TO THE PORTABILITY OF PERSONAL DATA

- 10.1. You have the right to require the Administrator to provide you with your personal data if all these conditions are met at the same time:
- 10.1.1. you have provided this personal data to him/her yourself on the basis of your consent to the processing of personal data, or in connection with the performance of a contract to which you are a party; and
 - 10.1.2. personal data is processed automatically.
- 10.2. They will provide you with a structured file with your personal data in a format that is commonly used and machine-readable.
- 10.3. If all of the above conditions are met at the same time, you also have the right to transfer the file with your personal data provided to another administrator, or to require the Administrator to transfer the

said file with personal data to another administrator directly. Your request for the transfer of the personal data file will be granted directly by him, if it is technically feasible for him.

- 10.4. In addition to the above conditions, the Administrator hereby extends the right to the transferability (portability) of personal data, so that you also have the right to have the Administrator pass on to you all your personal data provided to you by a third party (typically a coach), and not obtained directly from you.

RIGHT TO OBJECT

- 11.1. You have the right to object to the processing of your personal data if the controller processes this data on the basis of a legitimate interest or public interest, including profiling.
- 11.2. The Administrator or a third party may have a legitimate interest in processing. If the Administrator receives the objection raised, they will not further process your personal data. However, this does not apply if the Controller has serious legitimate reasons for such processing of your personal data, which prevail over your interests, rights and/or freedoms, or if it is necessary to process the personal data to determine, exercise, or defend legal claims. In the event that the Administrator finds serious justified reasons, they will inform you immediately.
- 11.3. You have the right to object to the processing of your personal data if the Administrator processes this data for the purposes of direct marketing, including profiling. If the Administrator receives the objection raised, they will not further process your personal data.

RIGHT TO SUBMIT A COMPLAINT TO THE SUPERVISORY AUTHORITY

- 12.1. You have the right to lodge a complaint directly with the supervisory authority in a Member State of the European Union. For the Czech Republic, contact the Office for Personal Data Protection, based at Pplk. Sochora 27, 170 00 Prague 7.
- 12.2. For the Czech Republic, more information on its activities and how to file a complaint can be found on its website available at www.uoou.cz or at the registered offices of the Office.

INFORMATION FOR EXERCISING YOUR RIGHTS

- You can exercise your rights at the Administrator's e-mail address oegv@golf.at or you can send it to the Administrator's address.
- As soon as the Administrator receives your application, which will not show who the applicant is, he/she will have to verify your identity, i.e. the fact that the application was made by an authorized person. If he/she is not sure about your identity, it could happen that he/she will provide your personal data to a third party. If you refuse to provide assistance to the Administrator in verifying your identity, they will not be able to comply with the request.
- The Administrator will respond to your request without undue delay, but not later than within one month of receiving your request. If, for certain reasons, it is not possible to process your application within the specified period, the Administrator will send you a notification in which it will extend the specified period by a maximum of another two months (i.e. a maximum of a total of three months).
- The Administrator will send you a reply to your request to the e-mail from which he received the request. If you insist that the Administrator inform you of the processing of the application in another way, for example by post, please provide this information directly in the submitted application.
- Your requests are processed by the Administrator free of charge. However, the administrator is entitled to demand that you reimburse the costs associated with providing the required information or communication, or performing the required actions, if the submitted request would be

unreasonable or disproportionate (especially if it were repeated). In such a case, the Administrator is entitled to immediately refuse to comply with said request.