

The company **Upfan, s. r. o.**, 56 322 551, registered in the Commercial Register of the Municipal Court of Bratislava III, Section Sro, Insert No.: 179257/B (hereinafter referred to as the "**Operator**") hereby provides you as a data subject within the meaning of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of personal data of the European Parliament and of the Council (EU) 2016/679. 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) (hereinafter referred to as the "**Regulation**") and Act No. 18/2018 Coll. on the protection of personal data (hereinafter referred to as the "**Act**")

as well as the UK General Data Protection Regulation ("UK GDPR") and the Data Protection Act 2018, as amended (including the Data (Use and Access) Amendment Act 2025). For the purposes of this document, the term '**Regulation**' includes the UK GDPR where it applies to data subjects in the UK.

Notice of data subject rights,

that you have under the aforementioned legislation because, as a Operator, the Operator processes your personal data for purposes related to the provision of services relating to the facilitation of ticket and season ticket sales by the Operator via a web or mobile application operated by the Operator (the "Application") for events organised by third parties.

01 Right to information (Article 13 of the Regulation)

In order to fulfil the information obligation of the Operator, which corresponds to your right to information, we hereby provide you as a data subject with the following information in accordance with the provisions of Article 13 of the Regulation:

01/01 Identification and contact details of the Data Operator

Business name:	Upfan, s. r. o.
Registered office:	Karpatské námestie 10A, 831 06 Bratislava - Rača district
ID:	56 322 551
Registration:	Commercial Register of the Municipal Court of Bratislava III, Section: Sro, Entry No.: 179257/B
Tel. no.:	+421 918 318 082
E-mail:	info@upfan.io

01/02 Processing of personal data

01/02/01 Website

Scope and purpose of processing

We only record and use the personal data of our website users to the extent necessary to operate a functional website and its content and services.

When you access and use our website, we only collect personal data that your browser automatically transmits to our server. This information is temporarily stored in a so-called log file. The following data is recorded without your intervention and stored until it is automatically deleted:

- The IP address of the computer,
- date and time of access,
- the name and URL of the downloaded file,

- the website from which the access is made (referring URL); and
- the browser used and, where applicable, the operating system of your computer, as well as the name of your Internet access provider.

We process the data in question for the following purposes:

- general website administration,
- ensuring the connection to the website and its convenient use.

Legal basis

The legal basis for processing your personal data for this purpose is Article 6(1)(f) of the Regulation, i.e. our legitimate interest, which is the necessity of processing your personal data for the purposes of operating our website and its proper functioning. The provision of personal data for this purpose is not a legal or contractual requirement, but without processing it, it is not possible to visit our website.

You can object to this processing of your personal data.

Retention period

Your personal data will be deleted or blocked as soon as the purpose of the data retention has been fulfilled. We will proceed to a longer storage period in cases where required by law.

01/02/02 Application

Scope and purpose of processing

In order to provide our services, we have created an Application that allows you to book and purchase tickets, season tickets and credits for selected events organised by our contractual partners. In order to use this Application, it is necessary for you to register on it, or to log in after you have already registered, in order to make use of the online purchase services for selected tickets, credits or season tickets. We display the data name, surname, date of birth, gender, email and data about purchased tickets and season tickets to the organizer in its CRM solely for the purposes of aggregated statistics and customization of marketing communication.

For this purpose, we process your personal data to the following extent:

- first name, last name,
- date of birth,
- permanent residence,
- telephone number,
- email,
- IP address of the device,
- details of tickets and season tickets purchased,
- number of logins,
- date of last login.
- gender

Legal basis

The legal basis for the processing of your personal data for this purpose is Article 6(1)(b) of the Regulation, i.e. the performance of the sales contract to which you are a party. If you decide to upload a photograph of yourself to your user profile and provide data that is not marked with an * symbol, the

legal basis for processing this data is Article 6(1)(a) of the Regulation, i.e. your consent, which you express by uploading the photograph and providing this data. For the purposes of using the services, it is necessary to process, in addition to your identification data, the IP address of the device from which the ticket or season ticket was purchased, as these contain unique security features that are non-reproducible and associated only with a specific purchaser. The provision of data marked with * is a contractual requirement. The provision of other data is not necessary for the provision of the services in question and rather serves to improve the user experience and is therefore voluntary.

Retention period

We process the personal data collected for this purpose for as long as your user account is activated and then for 3 years after deactivation. If you do not log in to the App even once within 12 months, your account will be automatically deactivated.

01/02/03 Behavioural analysis - use of the Operator's services

Scope and purpose of processing

Thanks to the way you use our Application, we are able to recommend other events of a similar nature that may be of interest to you based on an analysis of your behaviour in terms of the category and type of tickets or season tickets purchased, or feedback provided by you or promotional offers used by our partners, if you have agreed to receive them.

For this purpose, we process your personal data to the following extent:

- first name, last name,
- email,
- IP address of the device,
- feedback provided,
- data on tickets and season tickets purchased,
- data on discounts used with the Operator's partners obtained via the Operator's app.
- gender

Legal basis

The legal basis for the processing of your personal data for this purpose is Article 6(1)(a) of the Regulation, i.e. your consent to the processing of your personal data for this purpose, which you can give by ticking the relevant box in the Application and then confirming this option. If you give us your consent to process your data for the purpose of carrying out behavioural analysis, we will be able to evaluate your preferences in terms of rental items.

Retention period

We process your personal data collected for this purpose for the duration of the consent you have given us, up to a maximum of the deactivation of your user account.

01/02/04 Marketing activities - business partners of the Operator

Scope and purpose of processing

We publish advertising of our business partners' goods and services on the Application as well as on the Website. This advertising may also be sent to you in the form of a free newsletter if you subscribe to it

in the Application or on our website. If you have given us your consent to analyse your behaviour when using the App, we can tailor the advertising to your preferences, otherwise it will be random.

For this purpose, we process your personal data to the following extent:

- first name, last name,
- email,
- IP address of the device,
- feedback provided,
- data on tickets or season tickets purchased,
- data on discounts used with the Operator's partners obtained via the Operator's app.
- gender

Legal basis

The legal basis for the processing of your personal data for this purpose is Article 6(1)(a) of the Regulation, i.e. your consent to the processing of your personal data for this purpose, which you can give by ticking the relevant box in the Application and then confirming this option. Once you have given your consent, you will be sent advertising and marketing information relating to the goods and services of our business partners, as well as promotions and discounts offered. If you consent to us processing your personal data for this purpose, but do not consent to the analysis of your behaviour as set out in the previous paragraph, advertisements and promotions will not be tailored to your preferences but will be displayed randomly.

Retention period

We process your personal data collected for this purpose for the duration of the consent you have given, at the latest until you deactivate your user account.

01/02/05 Marketing activities of the Operator

Scope and purpose of processing

We publish information and news about our services, updates, promotions, improvements and new possibilities of using the App, as well as about concluded collaborations with our business partners and other interesting events related to our business in the App and on the website. This information may also be sent to you in the form of a free newsletter if you subscribe to it in the App or on our website.

For this purpose, we process your personal data to the following extent:

- first and last name,
- email.

Legal basis

The legal basis for the processing of your personal data for this purpose is Article 6(1)(f) of the Regulation, i.e. our legitimate interest, which is to inform users about updates, promotions, improvements and new possibilities of using the App. The provision of personal data for this purpose is not a legal or contractual requirement, but without processing it, it is not possible to send you the newsletter and, logically, to subscribe to it.

Retention period

We will retain your personal data collected for this purpose for as long as your user account is activated. You can unsubscribe from the newsletter at any time. Opting out will also constitute an objection to the respective processing of personal data, which you have the right to do in this case pursuant to Article 21

(1) and (2) of the Regulation. After unsubscribing, we will no longer send you the newsletter and we will stop processing, including storing, your personal data for this purpose, provided that we do not use them legitimately for another purpose as stated in this information.

01/02/06 Contact form

Scope and purpose of processing

If you wish to contact us, you can use the contact form published on our website www.upfan.io to do so, or you can contact us in writing at our postal address.

For this purpose, we process your personal data to the following extent:

- first and last name,
- telephone number,
- email,
- the content of the message,
- the assigned message ID.

We will inform you if additional data is required for the proper processing of your request. The data entered into the contact form published on our website is transmitted via a secure https/SSL connection.

In this case, we process your personal data in order to respond to your request or other suggestion and, if necessary, to send you the information material you have requested. If necessary, the information provided to us will be sent to the person responsible for handling your request.

Legal basis

The legal basis for processing your personal data for this purpose is Article 6(1)(f) of the Regulation, i.e. our legitimate interest, which is to deal with your request or other reason for which you have contacted us. The provision of personal data for this purpose is not a legal or contractual requirement, but without processing it, your request or other suggestion cannot be properly processed and, logically, neither can it be properly submitted, whether on our website, by email or by post.

You can object to this data processing.

Retention period

As soon as your request or other complaint has been processed and the relevant facts have been definitively clarified, your personal data processed in connection with the contact form will be deleted without delay, unless longer retention is required for reasons of verifiability of the processing of the request or complaint or for reasons of statutory retention periods.

01/02/07 Further communication with the data subject

Scope and purpose

We will use your contact and identification data that we have collected in accordance with the Act and the Regulation, where necessary, for other necessary communications with you for the purpose of receiving and dealing with requests, suggestions, complaints and claims related to the services we provide.

For this purpose, we process your personal data to the following extent:

- first and last name,
- telephone number,
- email,
- permanent address,
- the content of the communication or request you send us.

Legal basis

The legal basis for processing your personal data for this purpose is Article 6(1)(b) and (c) of the Regulation, i.e. the performance of the contract to which you are a party and the fulfilment of our legal obligations under the relevant legislation, in particular:

- Act No. 40/1964 Coll. the Civil Code as amended,
- Act No. 513/1991 Coll. Commercial Code as amended,/
- Act No. 108/2024 Coll. on Consumer Protection and on Amendments and Additions to Certain Acts,
- Regulation and the Act.

In the event that you, as a data subject, submit any other request, complaint or suggestion which cannot be classified under the above, the legal basis for the processing of your personal data in this case will be Article 6(1)(f) of the Regulation, i.e. the legitimate interest of the Operator, which is the proper registration and processing of your request, complaint or suggestion. The provision of personal data for this purpose is a legal requirement in the case of complaint handling, but is neither a legal nor a contractual requirement in the case of other types of complaints. In both cases, however, processing is necessary for the above communication.

You may object to this data processing as long as it is based on our legitimate interest.

Retention period

Once your claim, complaint, request or other complaint has been processed and the relevant facts have been definitively clarified, your personal data processed for the purpose of the related communication will be deleted after 3 years from the processing of the complaint, unless longer retention is required for reasons of verifiability of the processing of the claim, request or complaint or due to statutory retention periods.

01/02/08 Satisfaction survey

Scope and purpose of processing

We are interested in your opinion because we want to continuously improve our services and adapt them to your needs. Therefore, you may be asked to complete a feedback form in order to survey your satisfaction with the App and our services.

For this purpose, we process your personal data to the following extent:

- first name, last name,
- email,
- IP address of the device,
- feedback provided,
- feedback ID assigned,
- details of how you use the App.

Legal basis

The legal basis for the processing of your personal data for this purpose is Article 6(1)(f) of the Regulation, i.e. the legitimate interest of the Operator, which is to adapt the Application to the needs of users, improve the user experience, simplify access, resolve error events and problems registered by users when working with the Application. The provision of personal data for this purpose is not a legal or contractual requirement, but its processing is necessary for the said purpose.

You have the right to object to this processing.

Retention period

We retain your personal data collected for this purpose for 6 months from the date of collection and then it is deleted unless we need it for a longer term solution to a problem identified in the Application.

01/02/09 Exercise of claims by the Operator

Scope and purpose of processing

In the event that material damage or other harm is caused to us by your actions, applicable law allows us to pursue and enforce claims arising from breaches of civil, commercial and criminal law, both in proceedings before the courts or the competent administrative authorities. In this case, we will use your personal data collected in accordance with the Act and the Regulation to conduct litigation, out-of-court settlement negotiations or to enforce our claims by way of execution (processing purpose compatible with the above-mentioned original purposes of processing personal data).

For this purpose, we process your personal data to the following extent:

- first name, last name,
- date of birth,
- permanent address,
- the circumstances of the occurrence of the damage event or the damage caused to our rights and legitimate interests.

Legal basis

The legal basis for the processing of your personal data for this purpose is Article 6(1)(f) of the Regulation, i.e. our legitimate interest, which is the exercise of our statutory rights in the event of a data subject's failure to comply with or breach of his or her obligations under the relevant legislation (in particular in relation to the prevention of damage and the assertion of claims arising from damage caused by the data subject). The provision of personal data for this purpose is a legal requirement.

Retention period

In the event that we assert legal claims against you and pursue legal or administrative proceedings, or if you assert claims against us and pursue legal or administrative proceedings against us, the personal data will be processed until the final conclusion of such proceedings.

01/02/010 Notification of criminal offences

Scope and purpose of processing

In the event that your conduct constitutes a criminal offence and we become aware of it, we will be compelled to report the commission of a criminal offence and cooperate with law enforcement authorities (processing purpose compatible with the original purposes of processing personal data set out above)

For this purpose, we process your personal data to the following extent:

- first name, last name,

- date of birth,
- permanent address,
- the circumstances of the commission of the offence.

Legal basis

The legal basis for the processing of your personal data for this purpose is Article 6(1)(c) of the Regulation, i.e. the performance of legal obligations and the exercise of statutory rights arising in particular from:

- Act No. 300/2005 Coll., the Criminal Code, as amended,
- Act No 301/2005 Coll., the Code of Criminal Procedure, as amended.

Retention period

In the event that we file a criminal complaint against you due to a reasonable suspicion of a criminal offence, your personal data will be processed until the final conclusion of such proceedings.

01/02/011 Cookies

Scope and purpose of processing

In some areas of our website we use so-called cookies, for example to recognise your preferences and to adapt the website accordingly. This facilitates navigation and ensures a high level of user-friendliness of our website. Cookies also help us to identify particularly popular parts of our website.

Cookies are small text files stored on your computer's hard drive. They allow us to store information for a certain period of time and to identify the computer from which you have logged on to our website. We use functional cookies (essential cookies) to help you navigate. You can set your browser to inform you about the use of cookies. This will ensure transparency in the use of cookies.

If you completely exclude the use of cookies, you may not be able to use certain functionalities of our website.

Functional cookies (essential cookies)

These cookies are essential to ensure that our website functions properly and that you can navigate it and use its functions, for example when accessing password-protected areas. Without these cookies, we cannot provide you with certain services or functions of the website. We use these cookies to identify registered users so that we can identify them during their visit and when they return to our website. A list of the necessary cookies, together with other information such as details of the provider, purpose or retention period, etc., is provided directly in the cookie bar on our website.

Legal basis

The legal basis for the processing of your personal data for this purpose is Article 6(1)(f) of the Regulation, i.e. our legitimate interest, which is the proper and correct functioning of the website, its security and accessibility.

For UK users, in addition to the ePrivacy Directive, we also comply with the Privacy and Electronic Communications Regulations (PECR).

Retention period

Once the data transmitted by the cookies is no longer required for the purposes of the individual cookies, these will be deleted. The retention period of each cookie is indicated directly in the cookie bar located on our website.

01/02/012 Analysis and tracking tools

We use tracking and analysis tools on our website to ensure that it is continuously optimised and can be adapted to your needs.

In accordance with Article 6(1)(a) of the Regulation, the legal basis for the processing of your personal data necessary for the use of the tracking and analysis tools specifically described below is your explicit consent. The following description of the tracking and analysis tools describes more specifically the relevant purposes of the processing and the scope of the data processed.

Google Analytics

We use Google Analytics to create pseudonymised user profiles for the user-oriented design of our website. Google Analytics uses cookies for the purpose of analysing how visitors use our website. The information generated by the cookies about the use of our website is usually transferred to and stored on a Google server in the USA. Please note that the US authorities are entitled, in accordance with the relevant US legislation, to access and use the personal data of data subjects, non-US citizens who have been transferred from Europe to the US, without any special basis and without the possibility of objecting to unauthorised access. Moreover, these transfers are not regulated in a way that would meet equivalent requirements to those existing in EU law, namely in relation to the proportionality principle, as monitoring programmes based on US law are not limited to what is strictly necessary.

Because we have enabled IP anonymization on our website, your IP address will first be truncated by Google in member states of the European Union or in other states that are parties to the Agreement on the European Economic Area. Only in exceptional cases will your full IP address be transmitted to a Google server in the USA and truncated there. Google will use this information for the purposes of evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet usage.

You can object to the creation of pseudonymised user profiles at any time. You can do so in several ways:

- by setting a cookie opt-out, which instructs Google not to store and use your data for web analysis purposes - with this solution, web analysis will only take place if the cookie opt-out is stored in your browser. If you wish to set a cookie opt-out, please set the opt-out in your browser,
- by setting your browser software,
- by installing a browser plug-in that prevents tracking.

01/02/013 Plug-ins

We use social networking plugins on our website, namely Facebook, Instagram (both operated by Meta Platforms Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, 462129 Dublin, Ireland) and LinkedIn (operated by LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland).

These services are provided by the respective companies ("operators"). The social plugins in question are identified by the respective buttons with the logos belonging to these services. On the basis of the data transmitted by the respective services via the social plugins, the service is able to log you into your account, if necessary. In order to increase the protection of your data on our website, the social plugins are integrated into our web stall together with the so-called "Shariff". This ensures that no automatic connection to the server of the respective operator is made if a subpage of our website containing such a social plugin is displayed.

The activation of the respective social plugins is carried out in two steps. To activate a social plug-in, you must first click on the relevant icon on our website. This will first activate the social plugin and your browser will establish a connection to the servers of the respective operator. With a second click,

you can then interact with the social plugins and, for example, share data from our website in your profile.

Details on the scope and purpose of the data collection and processing by the respective social network, as well as on the further processing and such use of your data, can be found in the data protection information directly on the website of the respective social network operator.

01/03 Disclosure of personal data to recipients and third parties

All of your personal data will be stored on our internal systems and will be further provided and disclosed by us, where necessary, to recipients to the extent provided for in this clause, which are:

- Lawyers, auditors, tax advisors, intermediaries who provide processing of personal data on the basis of a contract they enter into with us,
- third parties to whom personal data will be disclosed in connection with the performance of our obligations under specific regulations; such recipients include competent insurance companies, courts, police authorities, law enforcement authorities, bailiffs.
- Event organisers, to whom we display buyer data (including gender and age) in the CRM for statistical and fan relationship management purposes.

We take care in selecting the recipients of your personal data and, if these recipients are not bound by a legal obligation of confidentiality in relation to the personal data provided, we will bind them to this obligation by means of a specific written contract.

02 Other rights of the data subject

As we process your personal data, the Regulation grants you a number of rights through which you can control or influence this processing.

02/01 The right to withdraw consent to the processing of personal data at any time (Article 7(3) of the Regulation)

You have the right to withdraw your consent to the processing of your personal data at any time, in the same way as you gave it to us. However, the withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal.

02/02 Right of access to personal data (Article 15 of the Regulation)

You have the right to request and obtain confirmation from us as to whether we are processing your personal data. If we are processing your personal data, you have the right to obtain access to that personal data (copies of it) as well as the following additional information about

- the purposes for which the personal data is processed,
- the categories of personal data concerned,
- the recipients or categories of recipients to whom your personal data have been disclosed,
- the expected retention period of the personal data,
- the other rights set out in this notice.

Unless you request otherwise, we will provide you with a copy of your personal data and additional information in a written documentary form, in accordance with the preceding paragraph. If you request this information by electronic means, it will be provided to you electronically where technically possible.

02/03 Right to rectification of personal data (Article 16 of the Regulation)

We take reasonable steps to ensure that the information we hold about you is accurate, complete and up to date. However, this right allows you to ask us to correct your inaccurate personal data or to complete it without undue delay if it is inaccurate, incomplete or out of date.

02/04 Right to erasure of personal data (right to be forgotten) (Article 17 of the Regulation)

You have the right to request us to erase your personal data without undue delay after exercising this right, for example if:

- Your personal data is no longer necessary for the purpose for which we collected or processed it,
- you object to the processing of personal data pursuant to Article 21(1) of the Regulation; or
- if your personal data is being processed unlawfully.

However, this right of yours will be considered in the light of all relevant circumstances. We may be subject to certain obligations under the law for which we may not be able to comply with your request. In the event that we are unable to do so, we will inform you of this fact and the reasons why we are unable to do so.

02/05 Right to restriction of processing of personal data (Article 18 of the Regulation)

You have the right to ask us to stop processing your personal data in the cases provided for by law if:

- you challenge the accuracy of the personal data we hold about you (but only for a period allowing us to verify the accuracy of your personal data),
- the processing of your personal data is unlawful and you object to the erasure of your personal data, requesting instead that we restrict its use; or
- we no longer need your personal data for the purposes of the processing and wish to erase it, but you need it to establish, exercise or defend legal claims,
- you have objected to the processing of your personal data pursuant to Article 21(1) of the Regulation (see Article 2.7 of this notice), pending verification that the legitimate grounds on our side outweigh the legitimate grounds on your side.

02/06 Right to portability of personal data (Article 20 of the Regulation)

You have the right to obtain from us your personal data that you have provided to us in a structured, commonly used and machine-readable format and you have the right to request that we transfer your personal data to another operator subject to the fulfilment of the legal conditions; the exercise of this right is without prejudice to your right to erasure of your personal data.

However, the right of portability only applies to personal data that we have obtained from you on the basis of a contract to which you are a party.

02/07 Right to object to the processing of personal data (Article 21 of the Regulation)

If the processing of your personal data is based on our legitimate interest, you have the right to object to the processing. If you object and we do not demonstrate compelling legitimate grounds for processing your personal data which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims, we will not further process your personal data for these purposes.

02/08 Right to bring a data protection action (Section 100 of the Act; Articles 77 and 79 of the Regulation)

If you believe that the processing of your personal data carried out by our company is in breach of the Act and the Regulation, you have the right to lodge a petition for a data protection proceeding with the Office for the Protection of Personal Data, with registered office at Hraničná 12, 820 07 Bratislava, Slovak Republic, ID No.: 36 064 220 (hereinafter referred to as the "Office") or with another competent authority, in particular in the Member State of your habitual residence, place of work or place of the alleged breach.

The application for the initiation of proceedings (hereinafter referred to as 'the *application*') must contain:

- the name, surname, correspondence address and signature of the applicant,
- the name of the person against whom the application is directed, stating his name, surname, permanent residence or name, registered office and identification number, if any,
- the subject-matter of the application, indicating the rights allegedly infringed by the processing of the personal data,
- the evidence in support of the claims made in the application,
- a copy of the document or other evidence demonstrating the exercise of a right under Part Two of Title Two of the Act or the Regulation, if the data subject has exercised such right, or a statement of the reasons of special consideration for not exercising the right in question, if the application has been made by the data subject.

A model application for initiating proceedings before the Office is published on the website of the Office. Without prejudice to your right to seek the protection of your rights on the basis of the application for initiation of proceedings before the Office, you also have the right to assert your rights before a court of the Slovak Republic having subject matter and local jurisdiction if you consider that, as a result of the processing of your personal data in violation of the Regulation, your rights provided for in the Regulation have been violated.

You also have the right to lodge a complaint with the UK supervisory authority:

Information Commissioner's Office (ICO)

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom

Tel: +44 303 123 1113 | www.ico.org.uk

03 Transfer of personal data to third countries

We make transfers of personal data from the UK to the EU/EEA on the basis of an adequacy decision approved by the UK Government (valid until 27 December 2025). Transfers from the EU/EEA to the UK are permitted under the European Commission's adequacy decision of 28 June 2021. Should any transfers be made outside of the adequacy regime, we will use the International Data Transfer Agreement (IDTA) or the UK Addendum to the SCC.