

PRIVACY POLICY

This privacy policy (“**privacy policy**”) explains to you how an application called NELLY (hereinafter as “**application**”) processes your personal and other data. Application was published by Jolana Stryjová, place of business Hevlínská 497/7, 15521 Prague, Czech Republic, ID number 08915385, VAT number CZ9354135395, tel. no.: +420603554153 (hereinafter as “**we**” or “**us**”) who is the controller of your personal data.

During usage of application, we may collect your personal data as a controller. By checking the appropriate box in our application, you confirm that you have read this privacy policy and you are familiar with the processing of your personal data.

If you use our application, it is important for us to ensure that the processing of your information is completely comprehensible for you and transparent, and that you know all your rights.

We explain the following in this privacy policy:

- What information we collect and how;
- How we use the collected information and on what legal basis;
- For what period of time we process the collected information;
- Who has access to the collected information;
- What rights you have in relation to the collected information and how you should exercise them.

We have tried to describe everything as clearly and simply as possible; nevertheless, should you still not understand certain notions, such as personal data, data controller or processing of personal data, please do not hesitate and contact us on e-mail address letstalk@nelly-academy.com.

1. WHAT DATA WE COLLECT AND HOW WE COLLECT THEM

We collect the following information:

- **Information about your user account.** When you download the application, you will be allowed to create an account for the use of the application. In the registration form, you are required to fill your e-mail address, first name and surname, three-letter name code, telephone number and your position. You may also upload your profile picture in your profile settings anytime.
- **Information about usage of our application.** During usage of our application, we may process data about your device, information about a particular airplane and airport, state of flight, share data with other members of particular flight etc.
- **Information when you contact us or about your device (reports of error).** We may also gather information when you contact us via e-mail address or by telephone or by any other means.

All collected data are stored in accordance with article 3 of this privacy policy and are collected only by application. We do not collect data from other sources (such as public databases). The application is not intended for children use and may be only used by adults.

2. HOW WE USE THE COLLECTED INFORMATION AND ON WHAT LEGAL BASIS

Information about your user account and usage of our application are used to create the user account for you and to provide you services stipulated in article 2.1. of license terms and conditions. By checking the

appropriate boxes and making user profile, you are concluding a contract with us. Your email address may also be used to send you a new version of this privacy policy or terms or contact you whenever we encounter some issues with the application. Processing is necessary for the performance of a contract to which you are party according to the Article 6 (1) b) of the GDPR.

When you contact us or we process data about your device, we may keep a recording of the communication or information about your device (reports of error), so that we are able to help you resolve your problems to fulfil our duties to perform maintenance of the application. The processing is necessary for the performance of a contract to which you are party according to the Article 6 (1) b) of the GDPR and under our legitimate interest under Article 6 (1) f) of the GDPR.

We use your data in our **internal documents in which we keep records of whether your data have been erased and, if so, who erased them in our company and when**, so as to be able to document our compliance with the legal regulations in the field of personal data protection and also perform further duties resulting from other legal regulations.

Your personal data will not be used for any automated decision making, including profiling. Your personal data will not be used for advertising or sending you SPAM.

3. FOR WHAT PERIOD OF TIME WE PROCESS THE COLLECTED INFORMATION

Your personal data are always used only for a period necessary to achieve the purpose for which they were collected. We process your personal data for the period of time for which you are using our application. The relevant card where you may insert data about a particular airplane and airport, state of flight etc are stored for the period of 30 days. When you delete your account, we will store the data for the period of 30 days and after that, we will delete all personal data about you.

Information when you contact us or reports of errors are stored for the period of resolving issues.

4. WHO HAS ACCESS TO INFORMATION

We take care of the protection of personal data and we never sell our personal data files. We only pass the personal data to third parties for the above purposes only to the extent necessary.

Your personal data will be shared with:

- Google Ireland Limited providing Google Firebase services and cloud storage. More information at <https://firebase.google.com/terms>;
- Other users of the application when they are under one crew or under the same airplane.

We process your personal data only on the territory of the European Union or the European Economic Area.

If we transfer your personal data to third persons, we always do so on the basis of an appropriate agreement with such persons so that we are able to control how they treat your personal data.

5. WHAT RIGHTS YOU HAVE IN RELATION TO THE COLLECTED INFORMATION AND HOW YOU SHOULD EXERCISE THEM

You have the following rights in relation to our processing of your personal data:

- a) right of access to personal data;
- b) right to rectification;

- c) right to erasure ('right to be forgotten');
- d) right to restriction of data processing;
- e) right to data portability;
- f) right to object to processing; and
- g) right to file a complaint with respect to personal data processing.

Your rights are explained below so that you can get a better idea of their contents. **You can exercise all your rights by contacting us at the following e-mail address: letstalk@nelly-academy.com. You can also contact our data protection officer. You can file a complaint with the supervisory authority, i.e. the Office for Personal Data Protection (www.uoou.cz).**

The right of access means that you can ask us at any time to confirm whether or not personal data concerning you are being processed and, if they are, you have the right to access the data and to information for what purposes, to what extent and to whom they are disclosed, for how long we will process them, whether you have the right to rectification, erasure, restriction of processing or to object; from which source we obtained the personal data, and whether automated decision-making, including any profiling, occurs on the basis of processing of your personal data.

The right to rectification means that you may request us at any time to rectify or supplement your personal data if they are inaccurate or incomplete.

The right to erasure means that we must erase your personal data if (i) they are no longer necessary for the purposes for which they were collected or otherwise processed; (ii) the processing is unlawful; (iii) you object to the processing and there exist no overriding legitimate grounds for processing; or (iv) this is required of us based on a legal duty.

The right to restriction of processing means that until any disputable issues concerning the processing of your personal data are resolved, we must restrict the processing of your personal data.

The right to data portability means that you have the right to obtain personal data that concern you and which you have provided to us and which are processed in an automated manner and on the basis of consent or contract, in a structured, commonly used and machine-readable format, and the right to have these personal data transferred directly to another controller.

The right to object means that you may object to the processing of your personal data that we process for the purposes of our legitimate interests, especially for the purposes of direct marketing. If you object to processing for the purposes of direct marketing, we will no longer process your personal data for those purposes.

This Privacy policy is effective from 30.10.2020