

INFORMATION ON THE PROCESSING OF PERSONAL DATA

VR LIFE s.r.o., Business ID: 074 60 481, with its registered office at Novinářská 1254/7, Mariánské Hory, 709 00 Ostrava, Czech republic, registered in the commercial register kept by the Regional Court in Ostrava, section C, insert 75882 ("**VRL**"), as the administrator of personal data, hereby informs about the processing personal data that it performs for the purpose of:

- providing a license to use the application called "VR Vitalis Pro" or „VR Vitalis Care“ ("**Application**") either in cooperation with contractual partners ("**Partner**"), with VRL clients who make the use of the Application available to end users using devices for displaying virtual reality ("**Client** ") or in connection with the provision of the Application directly to end users ("**End User**"). The Application is intended for performing exercises in virtual reality, as illustrated on the VRL website www.vrvitalis.cz ("**Web**").

Part of this document is information on the rights that data subjects have in connection with this processing.

For any questions regarding the protection of privacy and the exercise of your rights, use this contact:

- e-mail: info@vrlife.cz

VRL cooperates with Partners on the basis of a partnership agreement concluded with a given Partner under the conditions and procedure according to the relevant partnership agreement ("**Partnership Agreement**").

VRL allows the Clients, based on the license agreement concluded with the Client under the conditions and procedure according to the relevant license agreement ("Client License Agreement"), to use the Application and to make the use of the Application available to End Users to perform exercises in virtual reality.

VRL allows End Users to use the Application on the basis of the license agreement concluded with the End User (so-called EULA) under the conditions and procedure according to the license agreement with the End User ("**End User License Agreement**").

Partnership Agreement, Client License Agreement and End User License Agreement as the "**Agreement**".

Partner, Client or End User together as the "**Party**".

1. For what purpose, on the basis of what title and what personal data do we process?

1.1. Conclusion and performance of the Agreement

In order to negotiate and conclude the Agreement and its subsequent performance, VRL needs the following personal data of the Party:

- identification and contact data of the Parties – natural persons (name, surname, Business ID, VAT, address, telephone, e-mail, mailing address),
- identification and contact details of a natural person acting on behalf of the Parties – legal entity (name, surname, address of permanent residence, telephone, e-mail, mailing address),
- invoicing data of the Parties – natural persons,
- data from communication with the Party, information about the conclusion of the performance of the Agreement,



- identification data of the End User (logs, IP address, login name and password),
- with the Partner, including the data necessary to determine the amount of the commission.

Without the above-mentioned data, it is not possible to conclude or fulfil the Agreement, i.e., it is not possible to cooperate with the Party without providing this data.

However, VRL usually does not require any personal data to negotiate and conclude an End User License Agreement. However, in the course of its subsequent performance (especially in the case of the End User's request for technical support), VRL may request and process the above-mentioned personal data of the End User. Without providing this data, it is not possible to cooperate with the End User.

If a Web visitor fills out the contact form available on the [Web](#), VRL will process the visitor's identification and contact details (name, surname, email, phone) and the content of the message.

If a Web visitor uses the chat option utilizing Messenger technology on the website, VRL will process publicly available information on the visitor's Facebook user profile in accordance with the information provided [here](#) and the content of the conversation between the visitor and VRL.

The legal title of the processing of this data is the conclusion and fulfilment of the Agreement at the request of the Party.

1.2. Fulfilment of obligations arising from legal regulations

VRL must process personal data in cases where it is required by law. For this purpose, VRL mainly processes personal data to the extent required by the relevant legal regulations in connection with VRL's obligation to keep accounts and when fulfilling related tax obligations.

1.3. Legitimate interests of VRL

In justified cases, VRL can also process personal data on the basis of a legal title, which is the protection of its legitimate interests. However, VRL always consistently assesses and ensures that the interest in processing your data for this purpose does not unreasonably interfere with your privacy.

Identification of persons acting on behalf of the Party: These are typically members of statutory bodies, employees or other authorized persons who, although not a party to the Agreement, conclude the Agreement on behalf of the Party, communicate with VRL and otherwise act on behalf of the Party. We need the personal data of these persons in order to be able to communicate and act through them with the Party for the purpose of concluding the Agreement with the Party and its further performance. For these persons, we usually process the first name, surname, e-mail, telephone number, delivery address, information about the job position or other relationship to the Party and data from communication with them.

Defence and enforcement of VRL's legal claims: VRL also processes personal data for the purposes of protecting the legitimate interest, which is to ensure the possibility of defending VRL within the framework of possible legal disputes, proceedings before the court or during inspections by state authorities or other public administration authorities. We process this data in order to be able to prove, if necessary, that we have acted in accordance with our contractual obligations and legal regulations.

1.4. Sending commercial messages

In the case of Parties with whom we have entered into an Agreement and in connection with which we have obtained their e-mail and/or telephone number, or in the case of other persons who have actively



and voluntarily signed up to receive our commercial communications (e.g., on the Web) , we process the personal data of these persons in the scope of e-mail and possibly telephone number for the purpose of sending information and news about our services and products (business communications).

The title of personal data processing for the purpose of sending business communications is, in the case of the Parties with whom we concluded the Agreement, VRL's legitimate interest in informing about the latest VRL offers.

The title of the processing of personal data for the purpose of sending commercial communications in the case of persons who have actively signed up to receive commercial communications themselves (regardless of whether they are a Party or not) is their consent, which was granted just by signing up to receive commercial communications.

If you no longer want to receive these messages from us, you can unsubscribe at any time for free. The possibility to do so is always mentioned in every such sent commercial communication, or you can contact us at any time at the contact e-mail listed above in this document.

2. For what purpose, on the basis of what title and what personal data do we process?

We obtain personal data primarily from data subjects. We do not collect any other data about you, except for those that you give us yourself. You are required to provide us with only accurate information and if your personal information changes, you must update the information.

We can also obtain personal data from the social network Facebook if you decide to contact VRL via the chat on the website.

We can transfer personal data under the conditions set by law to public administration bodies where the law requires us to do so, or if the given body requests it within its competences.

We use the following processors for data processing:

- Amazon Web Services EMEA SARL with its registered office at 38, avenue John F. Kennedy, 1855 Luxembourg, Grand Duchy of Luxembourg for the purpose of providing cloud storage and data backup; data may be transferred to the USA via the parent company Amazon Web Services, Inc., with its registered office at 410 Terry Avenue North, Seattle, WA 98109-5210, USA;
- RETROBOT s.r.o., Business ID: 08668655, with its registered office Francouzská 6167/5, Poruba, 708 00 Ostrava, for the purposes of software development and consulting in the field of information technology.

The administrator transfers personal data to third countries (e.g., to the USA as part of the above-mentioned services) only if the processing of personal data takes place in accordance with decision on the appropriate level of protection of personal data provided by the EU-USA Data Privacy Framework. In case of transfer of personal data to the USA, processing of personal data takes place on the basis of Standard Contractual Clauses (SCC). The administrator will take all steps at its own expense and responsibility to ensure compliance of the transfer of personal data to a third country with legal regulations.

3. How do we process personal data?

We process your personal data manually in accordance with the relevant purpose where manual processing is necessary or appropriate. When managing your data, our employees or other persons



working for us may act, among other things, for the purpose of eliminating errors, inaccuracies, etc. However, these persons may process personal data only under the conditions and to the extent stated above and are bound by the obligation to maintain confidentiality about personal data and security measures, the disclosure of which would endanger the security of personal data.

Personal data can be processed in electronic form by automated means, specifically through the software solution we use.

We always process personal data in accordance with the relevant legal regulations and ensure proper care and protection. We make sure that you do not suffer damage to your rights, especially the right to maintain human dignity and your private and personal life.

4. How long do we process personal data?

4.1. Agreement with the Party

We process personal data processed for the purpose of concluding and fulfilling the Agreement with the Party for the duration and fulfilment of the Agreement (i.e., for the time necessary to fulfil the obligations arising from it).

Even after that, we may process personal data for the following purposes:

4.2. Compliance with legal obligations

We process personal data processed as a result of our legal obligations within the time limits set by these laws.

We must process personal data that is required by the legal regulation governing the tax and accounting obligations of VRL (typically invoicing data and information about the provision of services) for the purposes of accounting and the fulfillment of tax obligations. The processing period is 5 (five) years from the end of the accounting period, in the case of documents relevant for VAT payments, it is 10 (ten) years from the end of the tax period in which the performance took place.

4.3. Legitimate interests

We process personal data even after the termination of the Agreement for the protection of our legitimate interests (i.e., defense against possible claims of the Parties or third parties, including before a court, for the purposes of recording and proving consent to the terms and conditions and identification of persons dealing with VRL on behalf of the Party) for the duration of the relevant limitation periods. If the relevant claim is not asserted, this period is typically 5 (five) years from the termination of the Agreement.

4.4. Sending commercial messages

We send commercial communications as stated above, and we process personal data for these purposes, until you unsubscribe from them in accordance with the procedure specified in paragraph 0 of this document.



4.5. Longer processing

Personal data may be processed even longer than stated above, in the event that a relevant reason for further processing arises, typically an administrative or judicial proceeding is initiated for which the personal data are relevant.

5. What are your rights?

First of all, you have the right to ask us for access to your personal data, including making a copy of all your personal data. You can do this by using the email listed in the header of this document.

Revocation of consent to processing: If we process your personal data on the basis of your consent, you can revoke your consent to their processing at any time freely and free of charge, via the contact email listed above, or otherwise, as stated elsewhere in this document. In this case, we will no longer process your personal data processed on the basis of a consent.

In the case of personal data that is not processed on the basis of consent, it is not possible to revoke the consent to processing. However, based on your request, we will always assess whether it is necessary to still process your personal data for any of the above-mentioned purposes.

Your other rights:

We will always inform you about:

- the purpose of personal data processing,
- personal data, or categories of personal data that are the subject of processing, including all available information about their source,
- the nature of automated decision-making, including profiling, and information regarding the procedure used, as well as the meaning and anticipated consequences of such decision-making for the data subject,
- recipients, or categories of recipients to whom personal data has been or will be transferred, and in the case of transfer of personal data to a third country, also on appropriate guarantees applicable to the transfer to ensure the security of personal data,
- the planned period for which personal data will be stored, or if it cannot be determined, the criteria used to determine this period,
- all available information about the source of personal data, if not obtained from you.

Your other rights include:

- ask us for an explanation,
- request that we remove the resulting situation, in particular it may be blocking, correction, addition, restriction of processing or disposal of personal data (right to be forgotten),
- request a copy of the processed personal data, or request personal data relating to you in a structured, commonly used and machine-readable format, and transfer this data to another administrator, without us preventing this in any way,
- ask a question or complaint to the Office for Personal Data Protection,
- object to the processing of personal data concerning you.



6. How we protect your personal data

We protect your data. The following security means are used for this in particular: implementation and enforcement of internal regulations for the protection of personal data, anti-virus protection, firewalls, encryption, control of access to personal data and authorization data, backups, physical means of protection and others.

This Information on the processing of personal data is valid and effective from 27 February 2024.

