

Privacy and Cookies Policy

GENERAL INFORMATION

This Privacy and Cookies Policy informs Users about what personal data may be collected when they use the website www.sabaparking.com (hereinafter, the "Website") and how **SABA PARKING CZ a.s.**, (hereinafter, "SABA") processes, uses and protects said data. It also informs them about the cookies, if any, used on the Website.

SABA treats Users' privacy and the confidentiality of their personal data as matters of priority.

CHANGES TO THE PRIVACY AND COOKIES POLICY

SABA reserves the right to modify or update this Privacy and Cookies Policy at any time. Users must therefore read it carefully, as it may have been subject to unannounced modifications that took effect on the date indicated therein.

PRIVACY POLICY

WHO IS THE DATA CONTROLLER OF MY PERSONAL DATA?

SABA, with ID No. 261 98 631 and registered office at Washingtonova 17/1599, Postal Code 110 00 Prague 1, Czech Republic, is the data controller of the personal data collected through the Website.

You may contact in relation to any matter concerning the processing of your personal data, by emailing info.cz@sabagroup.com or by writing to the postal address provided above.

HOW DO YOU COLLECT MY DATA?

Data processing when visiting the website

When you access the Website, SABA automatically collects, stores and uses technical information as described in the Cookies Policy. The legal basis is the Users consent.

Data processing when contacting SABA

You can use the contact form on the Website to submit enquiries to SABA, stating your name and e-mail address.

You can also contact SABA by e-mail. When you contact SABA by e-mail, the data you provide (e.g. your e-mail address, your name and telephone number if applicable) will be stored by SABA in order to answer your questions.

The data provided by you will be stored by SABA in order to enable communication with you (legal basis is Art. 6 (1) f) GDPR).

WHAT DO YOU USE MY DATA FOR AND ON WHAT BASIS?

The data you provide will be used by SABA to process requests you send through the means available on the Website.

The legal basis for processing your data is express consent, which will be obtained when you send your request.

SABA will process only the personal data you will provide when submitting the request. So that you can submit to SABA your request, SABA will need to know at least your name, surname and email address.

When processing your personal data, SABA will not carry out any automated decision-making, including profiling.

Data collected automatically will be processed as described in the Cookies Policy. By using the Website you agree that, unless you have set your device's browser to reject them, we can place the types of cookies described in the Cookies Policy on your device, and use that data in accordance with this policy.

WITH WHOM DO YOU SHARE MY PERSONAL DATA?

Unless otherwise indicated in the specific section on data collection, your data will not be disclosed to third parties. Your personal data will not be transferred outside the European Economic Area.

HOW LONG WILL YOU KEEP MY DATA?

Your data will be stored for the length of time necessary to fulfil the purpose for which it was collected and/or to process your request. If your data is used for several purposes that require it to be kept for different periods of time, the longest storage period will apply.

When your data is no longer necessary, access to said data will be limited to compliance with strictly legal obligations or it will be destroyed in a secure manner.

HOW DO YOU PROTECT MY DATA?

SABA is committed to information security and has defined security policies and procedures to guarantee the confidentiality of your data.

SABA may hire third parties to provide certain services, which may involve access to and/or processing of your personal data by said third parties as data processors. In all cases, however, third parties are required to comply with current legislation and SABA's security policies, and must guarantee that they will use the information in accordance with SABA's instructions and implement the appropriate technical and organisational measures to guarantee the security of the information.

WHAT ARE MY RIGHTS CONCERNING MY PERSONAL DATA?

You may, at any time, exercise your right to access, rectify, port or erase your data, or to restrict or oppose the processing thereof, and, where appropriate, revoke the consent you provided, under the terms set forth in the current regulations, mainly the EU Regulation 2016/679 (hereinafter "GDPR").

In order to do so, you may contact with SABA by writing to the postal address provided above or by emailing info.cz@sabagroup.com.

Right of access by the data subject (GDPR Article 15):

At any time, you can request information about the data that SABA has about you. This information includes the data categories processed by us, the purposes for which SABA processes it, the source of the data if SABA did not collect it from you directly and, where applicable, the recipients to which SABA has transferred your data. You can obtain from SABA one free copy of your data that is part of the

agreement. If you are interested in additional copies, SABA reserves the right to charge you for any additional copies.

Right to rectification (GDPR Article 16): You can request that SABA rectifies your data. SABA will take appropriate measures to maintain, based on the latest information available to SABA, the correctness, completeness, timeliness and relevance of the data SABA has and continue to process regarding you.

Right to erasure (GDPR Article 17): You can request that SABA erases your data if the legal requirements exist for doing so. In accordance with GDPR Article 17, this could be the case if

- the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- you withdraw your consent on which the processing is based and where there is no other legal ground for the processing;
- you object to the processing of your data and there are no overriding legitimate grounds for the processing, or you object to data processing for direct marketing purposes;
- the personal data has been unlawfully processed

if such processing is not necessary

- for compliance with a legal obligation that requires that SABA processes your data;
- especially with respect to retention periods required by law;
- for the establishment, exercise or defence of legal claims.

Right to restriction of processing (GDPR Article 18): You can request the restriction of processing of your data by SABA if

- you contest the accuracy of the personal data for a period enabling SABA to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of its use instead;
- SABA no longer needs your data but you require it for the establishment, exercise or defence of legal claims;
- you have objected to processing pending the verification whether SABA's legitimate grounds override yours.

Right to data portability (GDPR Article 20): Your data shall, where technically feasible, be transmitted to another responsible party at your request. This right shall be available to you only insofar as data processing is based on your consent or is necessary in performance of an agreement. Instead of receiving a copy of your data, you can also request that SABA transfers the data directly to another controller that you specify.

Right to object (GDPR Article 21): You can object, on grounds relating to your particular situation, at any time to processing of your personal data if data processing relates to our legitimate interests or to those of a third party. SABA will cease processing of your data in such a case. The latter shall not apply if SABA can demonstrate compelling legitimate grounds for the processing which override your interests or SABA requires your data for the establishment, exercise or defence of legal claims.

Right to withdraw the consent (Art. 7 GDPR): You have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Moreover, if you believe that a breach of the data protection legislation has been committed with respect to the processing of your data, you may file a complaint with Czech Data Protection Office.

COOKIES POLICY

WHAT ARE COOKIES?

Cookies are small files that are stored on devices used to access websites (e.g. computers, smartphones and tablets) and that contain certain information. There are different types of cookies:

- Depending on the entity that manages the equipment or domain from which the cookies are sent and that processes the data obtained, these can be:
 - Own cookies: those that are sent to the User's device from equipment or a domain managed by SABA and from which the service requested by the User is provided;
 - Third-party cookies: those that are sent to the User's device from equipment or a domain that is not managed by SABA, but by another entity that processes the data obtained through cookies.
- Depending on the time they remain active on the terminal equipment, these can be:
 - Session cookies: those that are designed to collect and store data while the User accesses a website and remain on the User's device as long as the visit lasts (e.g. until the browser is closed and the visit ends);
 - Permanent cookies: those that are stored on the device and can be accessed and processed for a period defined by the person responsible for the cookie, which can last from a few minutes to several years.
- Depending on the purpose for which the data obtained through cookies is processed, these can be:
 - Technical cookies: those that are necessary to ensure that a website functions correctly and the different options and services offered on the website can be used. For example, identifying user sessions, personalising the website interface, allowing video content to be reproduced and displaying the banner with the notice about the use of cookies;
 - Personalisation cookies: those that allow the User to access the service with some general features predefined based on a series of criteria on the User's device, such as language, the type of browser from which the website is accessed and the regional setting);

- Analysis cookies: those that, whether they are processed by the owner of the website or by third parties, make it possible to monitor and analyse the behaviour of website users and quantify the number of users, and thus measure and statistically analyse how the website is used through aggregate or statistical information;
- Advertising cookies: those that make it possible to manage, as efficiently as possible, any advertising spaces the owner has included on the website, based on criteria such as edited content and the frequency with which adverts are shown.
- Social cookies: those that are necessary for external social networks such as Facebook, Google, Twitter, Pinterest and Instagram and whose function is to control interactions with social widgets on the website.

WHAT COOKIES DOES THIS WEBSITE USE?

This Website uses third-party cookies to collect information about the use of the Website and to analyse Users' browsing habits in order to make browsing easier, ensure they can access certain features and improve their browsing habits.

Information collected about Users' browsing habits is anonymous and is used solely for the purposes of obtaining statistics and making improvements. It includes the number of pages visited, the language, the city associated with the IP address from which the User accesses the site, the number of Users who visit the site, the frequency and recurrence of the visits, the length of visits, the browser used, the operator or type of device from which the visit is made and the operating system used.

This information is used to improve the Website by adapting it to new needs and providing Users who visit it with a better service.

SABA uses Google Analytics' audience measurement system, a tool for obtaining and analysing browsing information and determining how Users interact with the Website. This tool makes it possible to obtain information that can be used to improve the browsing process and offer Users a better service.

Google Analytics is a service provided by Google, Inc., a company based in Delaware (USA). A description of the type of cookies used by Google Analytics and their expiration times can be found at the following link:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

HOW CAN I MANAGE COOKIES?

You can view, allow, block or delete the cookies installed on your device by modifying your browser settings. However, please be aware that, if you do so, you may not be able to enjoy all of the Website's functions.

The links below provide information on how to disable cookies by changing your browser settings:

- Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Chrome: <https://support.google.com/chrome/answer/95647?hl=en-GB>
- Explorer: <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>
- Safari: <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data->

sfri11471/mac

Finally, please be aware that you are entitled to revoke your consent to the use of cookies by SABA at any time by configuring your browser in the terms indicated above.

DATE OF MOST RECENT UPDATE: May 22, 2019