

## **PRIVACY POLICY FOR KONEKTR**

**What is the purpose of this information?**

This information about processing and protection of your personal data will explain to you who we are, why and how we process personal data and what your rights are if you are a person affected by such processing and how you may get in touch with us if necessary.

**Who we are?**

**models4media s.r.o.**, having its registered office at Koperníkova 2281/2, 120 00 Prague 2, the Czech Republic, Company ID No.: 07630093 (“models4media” or “we”) are the provider of KONEKTR mobile application (“KONEKTR”) intended for ensuring various communication and the social network services developed by us (the “Services”). The Services include all services that are made available through KONEKTR, in particular submitting photos and videos, live chat or direct video calls. KONEKTR enables our users (“Users”) to access premium, exclusive and non-exclusive content created and published by our influencers (“Influencers”), as well as to use video and voice calling, messaging and other available communication functionalities between Users and Influencers.

Our contact and other details can be found at the end of this policy.

models4media is a controller in relation to the personal data processed in accordance with this policy and therefore is responsible for your personal data processing.

**When do we process your personal data?**

We may process your personal data in the following cases:

- you are our User and you use KONEKTR (with or without registration),
- you are our Influencer.

**What personal data do we process?**

We may process personal data relating to you that we have either obtained from you, or obtained from a different source. The personal data relating to you that we process may include the information set out below.

**Your personal data that we process when you use or otherwise access our Services**

Personal data that we may process are:

- if you are Influencer: name and surname, date of birth, email address and internet hyperlink to your public account at the social network Instagram,
- if you are User: email, nickname,
- password to your account at KONEKTR,
- the information about the fact that you make the registration to KONEKTR via a third-party service provider, as Facebook.

Please note that we require the provision of this data in order to properly provide our Services in accordance with the Terms and Conditions (the "Agreement") you have concluded with us; in the event of non-provision of this information, we are unable to provide our Services properly.

If you agree, we may process also information about your activities that you carry out via KONEKTR (for example, information whether or not you purchase credits for the paid-for Services, information which Influencers you follow, what are your content preferences, etc.).

**Information we gain from our mutual communication**

We may process information that we obtain from communicating with you, including:

- Information about you that you give us or that results from our mutual communication via telephone, e-mail, or otherwise.
- Information you give us or that we obtain when you use our Services or in relation to such use, contact us with your request or when you report a problem.

**What personal data do we process when you use our website and mobile application?**

Information that we obtain from you when you use our website and mobile application includes:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, specific online identifiers (for example Apple ID), browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page.

Without collecting the IP address from you and processing it, we cannot connect you to the nearest server, which is necessary for the provision of our Services.

All IP addresses are fully anonymised by masking the last octet of the IP address.

**Cookies**

**For what purposes do we use your personal data and what are the legal grounds for our processing of your personal data?**

We may process your personal data for the following purposes:	The legal basis on which we process your personal data is as follows:
<p>To conclude the Agreement and to exercise the rights and fulfilments of the obligations arising from the Agreement under the terms stipulated therein.</p>	<p><u>Performance of a contract to which you are a party</u> – on this legal ground we process data necessary for the provision of the Services and necessary for the exercise of the rights and obligations arising from the Agreement</p>
<p>To:</p> <ul style="list-style-type: none"> <li>○ provide access to and operate the Services;</li> <li>○ provide support to you;</li> <li>○ provide the product updates, upgrades and new functionalities;</li> <li>○ communicate our relationship under the Agreement and respond to your questions or comments.</li> </ul>	
<p>To manage and administer our relationships and to fulfil our obligations according to applicable legal regulations.</p>	<p><u>Compliance with our legal obligations</u> – on this legal ground, we are for example required to keep certain information related to applicable consumer and accounting laws.</p>
<p>To:</p> <ul style="list-style-type: none"> <li>○ reach you out by some of our Influencers (in particular, by direct video calls and messages) and</li> <li>○ use pop-up notifications or similar direct messages.</li> </ul>	<p><u>Your prior consent</u> - where it is necessary to obtain your consent to the processing concerned in order for us to be allowed to do it, we will obtain and rely on your consent in relation to the processing concerned (see below for <b><u>how to withdraw your consent at any time</u></b>).</p>
<p>To:</p> <ul style="list-style-type: none"> <li>○ recognise your interests in KONEKTR and to evaluate your using of and your past activities at KONEKTR (in particular, your browsing history in KONEKTR) for display personalised content in KONEKTR,</li> <li>○ ensure better and more interesting way for the communication with the Influencers that you follow.</li> </ul>	

**Who do we share your personal data with?**

Your personal data are safe with us. We do not sell or trade your data with any third parties. Please note that we may only disclose your personal data to service providers that have undertaken the necessary security measures to protect your data. When we share personal information with others we require them to keep it safe. In this section you may learn more about who we share your personal information with.

We may share your personal data with the following recipients:

- our business partners, suppliers, subcontractors and service providers, for example authorised IT service providers, accounting companies, all to the extent necessary to meet the obligations of these suppliers and service providers in relation to models4media;
- other recipients, including:
  - our advertising and analytics partners, and
  - in some specific situation, our auditors, legal advisers and other professional consultants and service providers for the purposes described in this document;
- in relation to information obtained via our website or application:
  - analytics and search engine providers that may assist us in the improvement and optimisation of our website and application,

The current list of recipients to whom personal information is provided is available [here](#).

If you agree, we may also disclose some of your personal data (for example, your nickname and Apple ID) to the Influencer that you follow in order that he/she may contact you via KONEKTR.

**Other disclosures we may make**

We may provide your personal information to third parties:

- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation resulting from generally binding legal regulations or to enforce or apply our rights resulting from the legislation and/or the Agreement or to protect the rights, property and security of us, our Users/Influencers or others; in these cases, we may provide your data in particular to public authorities and our legal counsels and other professional consultants.

**Where do we process personal data?**

We do not provide your personal data to any third countries, i.e. countries outside of the European Union or the European Economic Area. If we provide your personal data to our service providers situated outside of the European Economic Area ("EEA"), such provision may only be made on the basis of a European Commission decision on the appropriate level of protection of personal data in that third country or on the basis of other appropriate safeguards (see [http://ec.europa.eu/justice/dataprotection/internationaltransfers/transfer/index\\_en.html](http://ec.europa.eu/justice/dataprotection/internationaltransfers/transfer/index_en.html)) in line with Chapter V of the EU Data Protection Directive (so-called GDPR).

**How are your data protected?**

Protecting your personal information is important to us. We have taken security measures to protect your personal data processed in hard copies or/and electronically as well from destruction, loss, alteration, unauthorized provision or access to them.

We take appropriate technical and organisational measures in accordance with the relevant data protection legislation in order to secure our website and as well as other systems used for data processing.

Unfortunately, transferring data across internet is never fully safe. Despite our efforts to do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us and you therefore carry out all data transmission under your sole responsibility. From the moment we receive your data we will take strict steps and security measures in order to prevent any unauthorized access to your data.

Would you like to find out more about our security measures that we have taken to protect your personal data? Please contact us via our contact details stated below.

**How long do we process personal data for?**

We process your personal data only for so long as is necessary for the purpose(s) for which it was originally collected.

Personal data processed for the purpose of enforcing the rights and fulfilling the obligations arising from the Agreement is processed according to the statutory deadlines set out in generally binding legal regulations (typically five to ten years). Personal data processed based on your consent will be processed unless the Agreement is withdrawn. Personal data processed based on legitimate interest is processed only for the duration of this interest.

After your data has been processed and if there is no legal basis for further processing of your data, it will be removed; this does not apply if further processing is necessary for the fulfilment of our legal obligations or if it required for any other legitimate and lawful purpose.

When you cease your registration at KONEKTR, your personal data will be erased with the exception of data that we have to process according to the statutory deadlines set out in generally binding legal regulations (from five to ten years).

## What are your rights?

Below you will find the rights you have regarding your personal data and which specific terms are set out in Chapter III of the GDPR. If you would like to exercise any of your rights, or receive more information about them, please contact us via the contact details below and we will assist you. Please note that some of the rights may not be applicable to your situation, as some of the legal requirements may not be met for the enforcement of such rights.

Regarding your processed personal data, you have the following rights:

- Right of access
  - You have the right to gain access to information about the personal data that we process about you. Should you have any questions regarding the processing, or you would like to have more insight about the personal data we process from you, please contact us via the contact details below and we will provide you with further information.
- Right to rectification
  - You can request from us to correct information inaccurately stored by us without undue delay. You also have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- Right to erasure / right to be forgotten
  - You have the right to request from us to permanently delete your personal information. You can make such a request if you for example believe that the personal data are no longer necessary in relation to the purpose for which the personal data were collected or otherwise processed.
- Right to restrict the processing activities
  - You have the right to request from us to restrict our processing activities, for example, if you believe we process incorrect personal data about you, for the time being until the correctness of that personal data is verified, or when the processing of your personal data is unlawful.
- Right to data portability
  - You have the right to request data that we process about you by automated means based on a contract or consent in a structured, commonly used and machine-readable format, and you have the right to request that we transmit those data to another controller, if technically feasible.
- Right to lodge a complaint with a supervisory authority
  - If you are not satisfied with the method how we process your personal information, you can contact us at any time in order to find a solution for your concern. However, you always have the right to file a formal complaint with the Office for Personal Data Protection of the Czech Republic (<https://www.uoou.cz/en/>).

**You have the right to object the processing of your personal data**

### **Right to object to the processing of your personal data**

**You have the right to object to the processing of your personal data for direct marketing purposes in which case your personal data shall no longer be processed for such purposes.**

**In the event that your data are processed on the legal basis of our legitimate interest, you shall have the right to object at any time to processing of your personal data; in which case we shall no longer process the personal data on this legal basis unless we demonstrate compelling legitimate grounds for the processing which overrides your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.**

**How to withdraw your consent to processing?**

Where we process your personal data on the basis of your prior consent to that processing, **you may withdraw your consent** at any time. In which case we shall stop the processing concerned. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

You can withdraw your consent to any relevant processing of personal data:

- By emailing us at [info@konektr.com](mailto:info@konektr.com)
- By writing to us at the address below.

**How to exercise your data protection rights?**

You can exercise your rights to your personal data here:

- By emailing us at [info@konektr.com](mailto:info@konektr.com)
- By writing to us at the address below.

If you wish to exercise any of your rights as a data subject and from your application it is not possible to verify the identity of the applicant or if we have reasonable doubts as to the identity of the person making the request, we reserve the right to ask for further information necessary to confirm the identity of the person applying the application.

**Contact details**

Our full contact details are:

models4media s.r.o.  
Kopernikova 2281/2  
120 00 Prague 2  
the Czech Republic

Email: [info@konektr.com](mailto:info@konektr.com)

**Changes to this policy**

All changes we make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

**Date**

This policy was last updated on April 2020.