

## **PING PONG SPOT PRIVACY POLICY**

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PING PONG Spot is owned by MB Sciuri (hereinafter – the “Company”), legal entity code 304889920 (hereinafter – “PING PONG Spot”, “we”, “our” or “us”). We respect and seek to ensure the privacy of users of the website [www.pingpongspot.lt](http://www.pingpongspot.lt) (hereinafter – the “Website”), users of PING PONG Spot services (hereinafter – the “Clients” or “You”), and other individuals, as well as the security of processed personal data. This Privacy Policy (hereinafter – the “Privacy Policy”) explains how we process collected personal data.

We reserve the right to update or amend this Privacy Policy at any time. The latest version of the Privacy Policy is always available on the PING PONG Spot Website: [www.pingpongspot.lt](http://www.pingpongspot.lt).

### **I. PROCESSING OF PERSONAL DATA WHEN USING PING PONG SPOT SERVICES**

A Client’s order/payment confirmation for the use of the PING PONG Spot premises for their intended purpose shall be deemed as consent to enter into a service agreement (hereinafter – the “Agreement”). In the performance of the concluded Agreement, PING PONG Spot collects and processes data necessary for the conclusion and execution of such Agreement.

For the above purpose and legal basis, the following personal data of Clients (natural persons) are collected:

- first name, surname, email address, (for minor visitors – the first name and surname of the minor for whose benefit the Client concludes the Agreement), telephone number;
- service location (selected table tennis premises);
- information related to the purchase of services (payment date(s), selected service option, price, quantity, payment method, discount granted, bank account number, bank, IP address);
- information regarding payments made.

In order to ensure secure and smooth online payment transactions, PING PONG Spot uses the online payment collection service provider Stripe. Information regarding the data collected by this service provider and the personal data protection measures applied may be found in Stripe’s Privacy Policy: <https://stripe.com/en-lt/privacy>

Where the Agreement is concluded with a legal entity, the Company processes the names, surnames, telephone numbers and email addresses of the persons who will use the services, as well as the name, surname and basis of representation of the representative of the legal entity who concluded the Agreement.

The Company does not accumulate or store the personal data of these persons and, where necessary, uses them for marketing purposes.

### **II. PROCESSING OF PERSONAL DATA FOR DIRECT MARKETING PURPOSES**

PING PONG Spot uses Your personal data for direct marketing purposes. We may also process Your personal data for direct marketing on the basis of our legitimate interest, unless You object to such processing when entering into the Agreement with us.

For direct marketing purposes, we process the following personal data:

- telephone number;
- email address.

You may opt out of our direct marketing communications at any time by replying “UNSUBSCRIBE” to the received communication.

We also use the services of Facebook, Instagram, LinkedIn and other online advertising providers. Information regarding their privacy policies, collected data and personal data protection measures may be found in the respective providers’ privacy policies.

Client data are used for direct marketing purposes until an objection to such processing or withdrawal of consent is received.

### **III. PROCESSING OF PERSONAL DATA FOR THE PROTECTION OF THE COMPANY’S LEGITIMATE INTERESTS**

The Company processes the first name and surname of a Client with whom the Company does not wish to enter into a new agreement after termination of the service agreement due to the Client’s fault (for example, in the event of complaints regarding improper behaviour at the premises, damage to property, or other important reasons). Such processing is based on Article 6(1)(f) of the General Data Protection Regulation, i.e., the legitimate interest of the Company not to conclude future sports or other service agreements with an undesirable Client.

Your data are stored in the electronic mail system of the Data Controller, access to which is granted only to responsible persons in accordance with their job functions.

For this purpose, the Client’s personal data are processed for 3 years following termination of the Agreement. The Company reserves the right to extend this period if reasonable evidence is obtained that entering into a service agreement with the Client may have adverse consequences for the Company.

### **IV. BUSINESS PARTNERS AND CONTRACTING PARTIES**

PING PONG Spot also processes personal data of business partners, suppliers, other contracting parties, as well as their employees, representatives and agents. Such data are collected and processed for the following purposes and legal bases:

- establishing, maintaining and developing business, professional or other lawful relationships with the aforementioned persons;
- concluding, performing and administering transactions, agreements and contracts;
- administering and managing financial settlements with natural persons not bound by employment relations with PING PONG Spot, legal entities providing services, and self-employed persons;
- developing and protecting the legitimate interests of PING PONG Spot;
- defending PING PONG Spot against claims, demands and complaints (legitimate interest);
- compliance with legal obligations applicable to PING PONG Spot.

PING PONG Spot retains such personal data for as long as the agreement or business relationship remains in force, or for as long as necessary to achieve the purposes for which the data are processed, in accordance with statutory retention periods, limitation periods for legal claims, or, where claims are made, for as long as necessary for such purpose.

## **V. PARTICIPATION IN PING PONG SPOT EVENTS**

By entering into the Agreement, the Client agrees that the fact of participation in events, as well as the Client's name, surname and image (photo/video), may be used for informing the public about PING PONG Spot events. Client photos/videos may also be published on PING PONG Spot social media accounts and on the Website.

## **VI. PROCESSING OF PERSONAL DATA THROUGH VIDEO SURVEILLANCE**

In order to ensure the protection of PING PONG Spot property, video surveillance is carried out within the premises and surrounding territory.

Video surveillance and processing of personal data (image data) of persons captured within the surveillance area are carried out on the basis of our and third parties' legitimate interests.

Individuals are informed about video surveillance by means of information signs containing a video camera symbol and the details of the data controller, displayed before entering the monitored territory and/or premises.

Personal data collected during video surveillance (image data) are retained for up to 14 days from the date of recording. In certain circumstances, where necessary for the protection of the interests of PING PONG Spot or a third party (e.g., in the event of an accident, criminal offence or other violation of law, agreement or rules), the retention period may be extended until completion of the investigation and adoption of a final decision.

## **VII. PROCESSING OF PERSONAL DATA ON THE WEBSITE**

When You visit our Website, PING PONG Spot may process Your IP address, network and location data where provided, and other related information. Such data are collected using cookies and similar technologies on the basis of Your consent.

Cookies are small text files (up to several KB in size) stored by Your web browser on Your computer, tablet or other smart device when visiting our Website. PING PONG Spot uses cookies to ensure efficient and secure operation of the Website and to analyse user habits in order to improve user experience and adapt the Website to users' needs and expectations.

More information about cookies and their deletion, management and settings is available at: [www.allaboutcookies.org](http://www.allaboutcookies.org).

The Website uses the following cookies:

- wp-settings-time-1, wp-settings-1, wordpress\_logged\_in, wordpress, PHPSESSID – standard cookies used to maintain user sessions;
- cookiesAgree – cookie used to identify whether You agreed to the use of cookies;
- uid – cookie used to recognise the user;
- AWSALB – standard cookie used to ensure website speed and quality;
- \_ga – cookie used by Google Analytics to analyse website activity and improve user experience;
- \_gat – cookie used by Google Analytics to collect statistical information regarding website traffic;
- \_fbp, \_fr – cookies used by Facebook to identify users;
- \_zlcmid, \_\_cfduid – cookies used to enable website chat functionality;
- \_gid – cookie used by Google Analytics to identify users.

## **VIII. DATA PROCESSORS AND OTHER DATA RECIPIENTS**

PING PONG Spot may engage certain service providers (data processors) for the processing of Your personal data. Such data processors include data centre service providers, internet browsing and analytics service providers, software development and maintenance companies, IT infrastructure service providers, communication and security service providers, and other service providers to whom personal data are disclosed only to the extent necessary under concluded agreements.

If the Client chooses an electronic invoice for payment, the Client's personal data shall be transferred to the electronic invoice provider, its payment service provider and intermediary.

Where the Client fails to fulfil payment or other obligations, we may transfer information regarding the Client (personal data) and information related to indebtedness to third parties having a legitimate interest, for the purposes of creditworthiness assessment, debt administration and debt recovery.

Where there is a sufficient legal basis (for example, where necessary for the conclusion or performance of a contract with You and where You have been duly informed thereof), data may be transferred to our business partners, contracting parties and counterparties to the extent necessary for the performance of contractual obligations or ordinary business activities of PING PONG Spot.

PING PONG Spot informs You that certain technical data related to Your visit to the Website (IP address, cookies, technical information regarding the browser used, and other browsing-related information) may, for statistical, analytical and related purposes, be transferred or made accessible to entities operating both within and outside the European Economic Area (EEA). For example, where we use Google Analytics services, such entity may be located in the United States of America.

PING PONG Spot ensures that personal data are transferred outside the EEA only where there is an adequate legal basis provided by applicable legislation, including necessity for the conclusion or performance of a contract, standard contractual clauses approved by the European Commission, or other legal safeguards, derogations or exceptions established by law.

PING PONG Spot is obliged, in cases and according to procedures established by law, to collect and provide Your personal data to competent authorities and other persons where required under applicable laws or legal acts (e.g., police authorities, other competent institutions, organisations) or under contractual obligations (e.g., insurance agreements in relation to insured events).

Without separate consent of the data subject, personal data may also be submitted to pre-trial investigation institutions, prosecutors or courts in administrative, civil or criminal proceedings as evidence, as well as in other cases provided by law.

## **IX. DATA RETENTION PERIOD**

Personal data may be retained for longer periods than specified above where:

- necessary for PING PONG Spot to defend itself against claims, demands or legal actions and exercise its rights;
- there are reasonable suspicions of unlawful activities subject to investigation;
- Your data are necessary for the proper resolution of disputes or complaints;
- required for backup purposes or operation and maintenance of information systems;
- required under applicable legal obligations;
- there are other grounds established by law.

## **X. YOUR RIGHTS**

With regard to Your personal data, within the scope and under the conditions established by applicable legislation and subject to applicable restrictions, You have the following rights:

- the right to access Your personal data and information regarding its processing;
- the right to request rectification of inaccurate, incomplete or incorrect data;
- the right to request erasure of personal data or restriction of processing;
- the right to object to the processing of Your personal data;
- the right to withdraw consent at any time where processing is based on consent;
- the right to lodge a complaint with the State Data Protection Inspectorate.

If technical disruptions make access to the premises impossible, You may contact us using the telephone number indicated on the entrance door. If access issues cannot be resolved immediately, the Client has the right to request a refund of the paid amount. Following assessment of the circumstances, and provided that the issue was not caused by the Client's technologies or inability to follow instructions, PING PONG Spot shall refund the paid amount within 10 business days.

The above rights and complaints may be exercised by contacting us through the CONTACTS section at [www.pingpongspot.lt](http://www.pingpongspot.lt).

Upon receipt of Your request, PING PONG Spot shall, no later than within 10 business days from completion of the request verification procedure, provide information regarding the actions taken in response to the request. Taking into account the complexity and number of requests, PING PONG Spot has the right to extend the response period by an additional month, informing You thereof no later than within one month from receipt and verification of the request and specifying the reasons for such extension.

## **XI. HOW TO CONTACT US**

If You have any questions regarding this Privacy Policy or requests related to the processing of Your personal data, You may contact us through the CONTACTS section at [www.pingpongspot.lt](http://www.pingpongspot.lt).

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