

PRIVACY POLICY

Pilates classes held in the Statek Odysea ("Pilates, Restore & Retreat")

1. Controller of personal data

- 1.1 The controller of personal data processed in connection with a specific booking is always the instructor who leads the given class (hereinafter the **"Controller"** or the **"Instructor"**). The individual instructors operating on the Website conduct business as self-employed natural persons and each of them processes exclusively the personal data of those clients who registered for the class she leads. This definition is identical to the definition of the contracting parties in the general terms and conditions (hereinafter the **"GTC"**). Decisive for determining the Controller is always the identification of the Instructor displayed for the relevant class in the booking interface at the moment the booking is made.
- 1.2 To exercise your rights under this privacy policy (hereinafter the **"Policy"**) and for any questions regarding the processing of personal data, please contact the relevant instructor by e-mail:
- **Instructor 1:** Ivrin Tanachawengsakul, Company ID IČO 23953152, registered office at Brno, contact email: Ivy@pilates-ivela.com
 - **Instructor 2:** Eliška Soukupová, Company ID (IČO): 06591400, registered office at Brno, contact email: ela@pilates-ivela.com
- 1.3 The website <https://ivela-collective.vercel.app> (hereinafter the **"Website"**) serves as a shared presentation and booking platform through which the individual instructors offer their classes. The operator of the Website as such is not the controller of the personal data processed in connection with a specific booking; the controller of such data is always the relevant Instructor. The only exception is data processed directly for the purposes of operating the Website (in particular cookies pursuant to Article 5), for which the position of controller is governed by the nature of the given processing.
- 1.4 The Controller undertakes to process personal data only in accordance with the applicable legal regulations, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter **"GDPR"**), and Act No. 110/2019 Coll., on the processing of personal data. It processes personal data exclusively for necessary and predetermined purposes, to the necessary extent and for the necessary period, in compliance with the principles of lawfulness, fairness and transparency, purpose limitation, data minimization, accuracy, and integrity and confidentiality; at the same time it adopts appropriate technical and organizational measures to ensure adequate security of personal data against unauthorized processing, loss or misuse.

2. What personal data we process and why

- 2.1 The Controller processes personal data only to the extent necessary to achieve the specific purpose and always on the basis of an appropriate legal title. An overview of the individual purposes of processing, categories of data processed, legal bases and retention periods is set out in the following table:

Purpose of processing	Categories of data	Legal basis	Retention period
Booking and handling of a class	Name, e-mail, telephone	Processing is necessary for the performance of the contract under Article 6(1)(b) GDPR.	For the duration of handling the booking
Payment for a class	Payment data (processed by Stripe)	Processing is necessary for the performance of the contract under Article 6(1)(b) GDPR.	Under Stripe's rules; proof of payment 10 years (accounting/tax regulations)
Issuance of a tax document	Name, invoicing data	Processing is necessary for compliance with the Controller's legal obligation under Article 6(1)(c) GDPR.	10 years
Sending invitations to further classes (e-mail)	E-mail	Processing is based on the Controller's legitimate interest under Article 6(1)(f) GDPR (so-called soft opt-in under Section 7(3) of Act No. 480/2004 Coll.), unless you have objected in advance.	Until unsubscription, no longer than 3 years from the last activity
Photographs/video from classes	Image/video recording	Processing is based on the Instructor's legitimate interest in promotion under Article 6(1)(f) GDPR; you may object in the manner set out in Article 6 of this Policy.	For the duration of the promotional purpose, no longer than 3 years from creation
Analysis of Website traffic	Cookies, anonymised behavioural data (Google Analytics)	Processing takes place on the basis of your consent under Article 6(1)(a) GDPR, given through the cookie bar.	According to Google Analytics settings, max. 14 months

- 2.2 The provision of data marked as necessary for booking and handling a class (in particular name, e-mail and telephone) is a contractual requirement; without providing it, the booking cannot be made or the class provided. Other processing takes place either on the basis of the Controller's legitimate interest or on the basis of consent, which the Client is entitled to withdraw at any time.

3. Recipients of personal data and processors

- 3.1 For the purpose of duly providing the services referred to in Article 2, personal data may be made available to the processors and recipients listed below, who process the data solely on the basis of the Controller's instructions and in accordance with concluded data processing agreements:
- [Stripe, Inc.](#) – provider of the payment gateway ensuring the processing of online payments for classes. Stripe is a company with its registered office in the United States of America; the transfer of personal data to the USA is ensured on the basis of an adequacy decision under the so-called [Data Privacy Framework](#).
 - [Google LLC \(Google Analytics\)](#) – provider of the tool for analysing the traffic of the Website. This data is processed only on the basis of consent given through the cookie bar. Google LLC is a company with its registered office in the United States of America; the transfer of data is ensured on the basis of an adequacy decision under the so-called [Data Privacy Framework](#).
 - [Vercel Inc.](#) – technical provider of the hosting of the Website, ensuring its operation and availability. A company with its registered office in the United States of America; the transfer of personal data to the USA is ensured on the basis of an adequacy decision under the so-called [Data Privacy Framework](#).
 - [Social networks](#) (in particular Instagram and Facebook, operated by Meta Platforms Ireland Ltd.) – platforms on which the Instructor publishes promotional photographs and videos from the classes. If a recording capturing the Client is published, the operator of the given social network processes the personal data contained in it under its own terms and privacy policy, as an independent controller. Meta Platforms Ireland Ltd. has its registered office in the EU (Ireland). The Client can influence the processing of her / his data on social networks through the privacy settings of his account on the given platform.
- 3.2 Personal data is not transferred to any other third parties unless such an obligation is imposed by a legal regulation. This concerns in particular the transfer of data to public authorities (e.g. the tax administration, courts or law enforcement authorities) to the extent and under the conditions laid down by legal regulations.

4. Sending invitations to further classes

- 4.1 A Client who makes a booking and provides his / her e-mail may, without any further special consent, be sent e-mail invitations to further classes and events of a similar nature. This processing is based on the so-called soft opt-in under Section 7(3) of Act No. 480/2004 Coll., on certain information society services, i.e. on the Controller's legitimate interest in offering its own similar services to existing customers.
- 4.2 The Client has the option to refuse the sending of such invitations already when making the booking, by a simple action in the booking form. He or Her may also unsubscribe from the invitations at any time and entirely free of charge, through the unsubscribe link provided in the footer of every e-mail sent.
- 4.3 Unsubscribing from the invitations has no effect on the sending of e-mails that are necessary for handling a specific booking, such as confirmation of the booking, a payment request or information about a possible cancellation of the class. The sending of these operational messages is governed by the purpose referred to in Article 2 and cannot be refused while the contractual relationship lasts.

5. Cookies

- 5.1 The Website uses technically necessary cookies, which are required for its basic functionality, in particular for the correct display of content and the functioning of the booking interface. Consent is not required for the use of these cookies under legal regulations, as the Website could not function properly without them.
- 5.2 The Website further uses analytical cookies (Google Analytics) serving to measure traffic and to evaluate visitor behavior for the purpose of improving content. These cookies are loaded only after the Client gives consent to their use through the cookie bar displayed when visiting the Website. The consent given may be withdrawn or changed at any time through the "Cookie settings" link located in the footer of the Website.
- 5.3 The Website does not currently use cookies or other similar technologies for the purposes of targeted advertising (e.g. Meta/Facebook Pixel). Should such technologies be introduced in the future, this Policy will be updated accordingly and their use will be conditional on the Client's prior consent.

6. Photographs and video recordings of classes

- 6.1 In connection with holding classes, photographic or video documentation may be taken, in particular for the purposes of promoting the Instructor's activity on social networks and on the Website. The details of

this processing, including the manner in which the Client may, for an individual booking, express his / her objection to the taking and use of such recordings (opt-out), are governed by the GTC.

- 6.2 The legal basis for this processing is the Instructor's legitimate interest in promoting her own business activity. In this processing, the Controller always takes into account the proportionality of the interference with the Client's privacy and his / her right to object in the manner set out in the GTC; if the Client objects, recordings in which he / her is captured will not be used for promotional purposes.

7. Rights of the data subject

- 7.1 In connection with the processing of his / her personal data, the Client has the following rights arising from the General Data Protection Regulation (GDPR):
- **Right of access (Article 15 GDPR)** – The Client has the right to obtain from the Controller confirmation as to whether his / her personal data is being processed and, if so, to obtain access to it together with information on the purposes, categories and duration of the processing.
 - **Right to rectification (Article 16 GDPR)** – The Client has the right to have the Controller, without undue delay, rectify inaccurate personal data concerning him, or complete incomplete data.
 - **Right to erasure (Article 17 GDPR)** – The Client has the right to the erasure of his / her personal data (the so-called right to be forgotten), unless there are legal grounds for its further retention, such as the obligation to archive tax documents.
 - **Right to restriction of processing (Article 18 GDPR)** – The Client has the right to request that the Controller restrict the processing of his / her data, in particular if she / he contests its accuracy or has objected to the processing.
 - **Right to data portability (Article 20 GDPR)** – The Client has the right to obtain his / her personal data in a structured, commonly used and machine-readable format and to transmit it to another controller.
 - **Right to object (Article 21 GDPR)** – The Client has the right to object at any time to processing based on legitimate interest, including the sending of invitations under Article 4 and the taking of photographs and video recordings under Article 6.
 - **Right to lodge a complaint** – The Client has the right to lodge a complaint with the Office for Personal Data Protection (registered office at Pplk. Sochora 27, Prague 7, www.uoou.cz) if he or she believes that the processing of his / her personal data has infringed legal regulations.
- 7.2 The Client may exercise any of the above rights through the contact e-mail listed in Article 1.2. The Controller is entitled, in justified cases, to request verification of the applicant's identity in order to prevent access by unauthorized persons to personal data.

8. Data security

- 8.1 The Controller adopts appropriate technical and organizational measures to secure personal data against unauthorized or accidental access, alteration, loss, destruction or other misuse. The scope of these measures corresponds to the nature, extent and sensitivity of the data processed, as well as to the current state of the art and the possibilities of a small business entity. Personal data is accessible only to the Controller and processors authorized by it, who are bound by an obligation of confidentiality.

9. Changes to this Policy

- 9.1 This Policy may be updated where necessary, in particular in connection with a change in the relevant legal regulations or the manner of processing personal data. The current wording of the Policy is always available on the Website and supersedes all previous wordings. Should there be a material change affecting the rights of Clients, the Controller will draw attention to it in an appropriate manner. This Policy takes effect on 17 July 2026.