

Privacy Policy for Somnium Space Ltd.

Last Updated: 14th June 2024

1. Introduction

Welcome to Somnium Space Ltd's Privacy Policy. At Somnium Space Ltd, we are committed to protecting your privacy and ensuring the security of your personal information. This Privacy Policy outlines our practices regarding the collection, use, and protection of your data. We aim to ensure that your personal data are always processed only to the extent necessary and only for the necessary purposes in accordance with applicable legislation, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter the "GDPR").

2. The Personal Data Controller

The personal data controller is Somnium Space Ltd., company organized and existing under the laws of the United Kingdom, with its registered office 159 High Street, Barnet, England, EN5 5SU, United Kingdom, EUID: UKEW.11137993 (hereinafter "**we**" or the "**Controller**" or the "**Operator**").

3. Information We Collect

We may collect various types of information from you, including:

- **Personal Information:** This may include your name, email address, phone number, and any other information you voluntarily provide to us.
- **Usage Data:** We may collect information about how you use our website, including your IP address, browser type, and operating system.

4. Legal Basis of Use of Your Information

The legal basis for personal data processing is:

- performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract in accordance with Article 6, par. 1, letter b) of the GDPR;
- compliance with a legal obligation to which the Controller is subject in accordance with Article 6, par. 1, letter c) of the GDPR;
- the legitimate interests pursued by the Controller or by a third party in accordance with Article 6, par. 1, letter f) of the GDPR;
- your consent to the processing of his or her personal data for one or more specific purposes in accordance with Article 6, par. 1, letter a) of the GDPR – for example the processing of personal data for the provision of customer support services to which you give your consent by contacting customer support.

5. How We Use Your Information

We use your information for the following purposes:

- **USE OF THE WEBSITE:** We are committed to making the browsing experience on the Somnium Space website as superior and user-friendly as possible. In this respect, we process data that may have the nature of personal data, including, but not limited to, data related to your visit to the Somnium Space website and the history of visits to the Somnium Space website, information concerning your browser settings, screen resolution, internet connection, etc. We process personal data for this purpose for a period of one year from the last visit to the Somnium Space website.
- **MANAGEMENT OF YOUR ACCOUNT:** In order to maintain the customer account, registration is required, during which we process identification, contact and other data that you provide or subsequently add or modify in your customer account. We process the provided data for the duration of your customer account and for 3 years after its termination.
- **PURCHASE OF PRODUCTS AT SOMNIUM SPACE:** Orders require personal data necessary for successful processing of the order (name, address, place of residence and mailing address, contact details, etc.). Provision of personal data is a necessary requirement for the conclusion and performance of a contract; without provision of personal data the contract cannot be concluded or performed by the

Controller. We process the personal data provided for a period of 5 years from the date when the last order is made at the Somnium Space.

- **CUSTOMER SUPPORT SERVICES:** For customer support purposes, we process identification data such as your name, contact data such as your e-mail address and, as the case may be, descriptive personal data such as your order number or purchase or print history. We process the personal data provided for a period of 5 years from your last activity in resolving a customer support request.
- **SENDING NEWSLETTER AND OTHER COMMUNICATION:** For the purposes of sending commercial communications, we use the e-mail address you provided, which we keep for a period of 5 years from its provision. We will also notify you when orders for the VR1 headset are open, send you updates and information about the VR1 headset and other related products or services.

The Controller shall delete the personal data upon expiry of the retention period.

The Controller does not perform automated individual decision-making or profiling of users within the meaning of Article 22 of the GDPR.

6. Data Security

We take data security seriously and employ industry-standard measures to protect your information from unauthorized access, disclosure, alteration, or destruction, in particular, a secured/encrypted access to the internet, encryption of customers' passwords in the database, regular updates of the system and regular backup of the system.

7. Data Sharing

We do not sell, trade, or rent your personal information to third parties. However, we may share your information with trusted service providers and partners who assist us in operating our website, participating in the delivery of goods/ performance of payments under a contract, providing customer support services, providing marketing services and providing services to you. We ensure that they also maintain the confidentiality of your data.

The Somnium Space websites may also contain other links and functionalities to third-party services and social networks, such as Facebook, Twitter, Instagram, etc., which may, if you choose to use them, process your personal data such as your IP address, the history of the pages you have visited or may store cookies or other technical means on your device, such as the Facebook pixel, etc. The processing of your personal data in this case is governed by the policies adopted by the operators of these services and social networks, which are available on their websites.

8. Cookies

We use cookies to enhance your experience on our website. You can manage cookie preferences in your browser settings.

In order to improve the quality of the Somnium Space and to facilitate their use, in particular to analyse the traffic and user behaviour on the Somnium Space websites, to personalise advertising and to make social media functions more accessible, the Somnium Space use cookies or other technical means stored on your end device (hereinafter the "**cookies**"). The cookies may be saved directly by the Controller, or they may be third party cookies. These files may not directly contain personal data, however, in conjunction with other data, may gain the nature of personal data.

9. Your Rights

You have the following rights with respect to your personal data:

the right of access to your personal data under Article 15 of the GDPR;

- the right to rectification of personal data under Article 16 of the GDPR, or restriction of processing under Article 18 of the GDPR;
- the right to erasure of personal data under Article 17 of the GDPR. However, the Controller declares that, following the exercise of your right to erasure of your personal data, the processing of those personal data necessary for the fulfilment of financial, tax and other legal obligations to which the

Controller is subject, as well as for the establishment, exercise or defence of legal claims, continues after the Controller has exercised your request;

- the right to object, under Article 21 of the GDPR, to the processing on the legal basis of legitimate interests or for the purpose of direct marketing;
- the right to data portability under Article 20 of the GDPR;
- the right to withdraw consent to the processing of personal data at any time;
- the right to unsubscribe from receiving commercial communications, i.e. to withdraw consent with the related personal data processing through the link included in the communications;
- the right to receive a copy of the standard contractual clauses concluded by the Controller under Article 46 of the GDPR.

To exercise the above rights, you can use the e-mail address privacy@somniumspace.com or you can contact us by sending a written request to U Prašné brány 1078/1, 110 00 Prague 1, Czech Republic.

You can also file a complaint at any time directly with the Office for Personal Data Protection with its seat at Pplk. Sochora 27, Prague 7, the Czech Republic or with any of the supervisory authorities of the relevant Member State of the European Union (EU) or the European Economic Area (EEA). Contact details of the individual supervisory authorities can be found here: https://edpb.europa.eu/about-edpb/about-edpb/members_en

10. Contact Us

If you have any questions or concerns about our Privacy Policy or how we handle your data, please contact us at privacy@somniumspace.com

11. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. We encourage you to review this policy periodically. This Privacy Policy enters into effect on June 14, 2024.