

<b>MultiSport Virtual Card Users performing international visits</b>	
<b>Information on the processing of personal data as part of international visits by MultiSport companies ("MS Companies") other the one that issued your Multisport card</b>	
<b>Controller</b>	<p><b>Please note:</b></p> <ul style="list-style-type: none"> <li>MS Companies enumerated in this notice may together be referred to as "Controllers", "we" or "us". Irrespective of that, when processing your personal data, each of them acts as an independent controller.</li> <li>An MS Company outside your country of origin (i.e. country where your Multisport card has been issued) shall become a Controller of your data only under the condition that you make an international visit on the territory where it operates. Otherwise, no processing described below will take place.</li> </ul>
	Benefit Systems S.A., with its registered office in Warsaw, Pl. Europejski 2, 00-844 Warsaw (" <b>Benefit Poland</b> ").
	You can contact Benefit Poland in the following way: <ul style="list-style-type: none"> <li>by post to the address as above, with "Personal data" note;</li> <li>by e-mail to the address: daneosobowe@benefitsystems.pl;</li> <li>by using the contact form available at: benefitsystems.pl/en/help/rodo.</li> </ul>
	MultiSport Benefit s.r.o., with its registered office at Lomnického 1705/9, 140 00 Praha 4, Czech Republic (" <b>Benefit Czechia</b> ").
	You can contact Benefit Czechia in the following way: <ul style="list-style-type: none"> <li>by post to the address as above, with "Personal data" note;</li> <li>by phone at +420 220 188 700.</li> </ul>
	Benefit Systems Slovakia s.r.o., with its registered office at Prievozská 14, 821 09 Bratislava – mestská časť Ružinov, Slovak Republic (" <b>Benefit Slovakia</b> ").
	You can contact Benefit Slovakia in the following way: <ul style="list-style-type: none"> <li>by post sent to the address as above, with "Personal Data" note;</li> <li>by e-mail to the address: dpo@multi-sport.sk.</li> </ul>
	Benefit Systems d.o.o., with its registered office at Vjekoslava Heinzela 44 street, HR-10000 Zagreb, Croatia (" <b>Benefit Croatia</b> ").
	You can contact Benefit Croatia in the following way: <ul style="list-style-type: none"> <li>by post to the address as above, with "Personal data" note;</li> <li>by e-mail to the address: dpo@benefitsystems.hr.</li> </ul>
	Benefit Systems Bulgaria OOD, with its registered office at 11-13 Yunak Str., Krasno selo quarter, Sofia 1612, Bulgaria (" <b>Benefit Bulgaria</b> ").
You can contact Benefit Bulgaria in the following way: <ul style="list-style-type: none"> <li>by post to the address as above, with "Personal data" note;</li> <li>by to the address: <a href="mailto:dpo@benefitsystems.bg">dpo@benefitsystems.bg</a>.</li> </ul>	
Benefit Systems Spor Hizmetleri Limited Şirketi, with its registered office at Sultan Selim Mah. Hümeyra Sk. NEF 09 Sitesi B Blok No:7 İç Kapı No: 82, 34400 Kağıthane/İstanbul, Türkiye (" <b>Benefit Türkiye</b> ").	
You can contact Benefit Türkiye in the following way: <ul style="list-style-type: none"> <li>by post to the address as above, with "Personal data" note;</li> <li>by e-mail to the address: info@benefitsystems.com.tr.</li> </ul>	
<b>Data Protection Officer („DPO“)</b>	Some of the Controllers have appointed a DPO. Below you can find those Controllers as well as contact details of their DPOs.
	<b>Benefit Poland</b>
	You can contact the DPO appointed by Benefit Poland in the following way: <ul style="list-style-type: none"> <li>by post to the address, with "IOD" note;</li> <li>by e-mail to the address: iod@benefitsystems.pl.</li> </ul>
	<b>Benefit Croatia</b>
	You can contact the DPO appointed by Benefit Croatia in the following way: <ul style="list-style-type: none"> <li>by post to the address, with "DPO" note;</li> <li>by e-mail to the address: dpo@benefitsystems.hr;</li> </ul>
	<b>Benefit Slovakia</b>
You can contact the DPO appointed by Benefit Slovakia in the following way: <ul style="list-style-type: none"> <li>by email to the address: dpo@multi-sport.sk.</li> </ul>	
<b>Categories of personal data</b>	Controllers shall process your personal data such as: <ul style="list-style-type: none"> <li>identification data;</li> <li>data pertaining to your use of services (including services of our Partners and providers of additional services offered in relation to the MultiSport Programme).</li> </ul>
<b>Purposes of the processing</b>	<p>If you use your MultiSport card abroad, a Controller in the country you visit will process your personal data for the following purposes:</p> <ul style="list-style-type: none"> <li>enabling international visits,</li> <li>tracking and combating frauds;</li> <li>handling complaints;</li> <li>establishment, exercise or defence of legal claims;</li> <li>marketing purposes, including especially statistical analysis.</li> </ul> <p>The processing above is based on the legitimate interest of the Controller, consisting in the proper performance of agreements, preventing fraud, the necessity to establish or defend against claims or to carry out marketing activity (Article 6(1)(f) of the GDPR or Article 5(2)(f) of Turkish Data Protection Law).</p> <ul style="list-style-type: none"> <li>tax and accounting purposes, because it is required by applicable legal regulations (legal basis: Article 6(1)(c) of the GDPR or Article 5(2)(ç) of Turkish Data Protection Law).</li> </ul> <p>A Controller receives your data both from the company that issued your MultiSport Card (e.g. as part of access verification process), as well as directly from you (e.g. time and place of an international visit you make in the country of the Controller's operation).</p>
<b>Data retention period</b>	<p>When the processing is based on legitimate interest, a Controller will process the data until it is necessary for the performance of that legitimate interest, e.g. until the end of your visit or until your complaint has been handled. The processing shall also stop when you raise an effective objection to it.</p> <p>When law imposes certain obligations on a Controller, in particular tax and accounting obligations, the Controller will process the data necessary for the performance of those obligations for the period required by law.</p>
<b>Recipients of personal data</b>	Your personal data will be transferred to Benefit Systems Group companies, including especially the one that issued your MultiSport card, Partners (sport and recreational facilities), entities providing tele-information services and IT support and security services,

	entities providing services involving storage and deletion of data carriers, entities providing user services and supporting our marketing activities, legal advisors and auditors. Your data can also be transferred to public authorities in instances required by the law.
<b>Rights of data subjects under GDPR and Turkish Data Protection Law</b>	<p>You have a right to:</p> <ul style="list-style-type: none"> <li>▪ <b>object to the processing;</b></li> <li>▪ access your data;</li> <li>▪ obtain the rectification of your personal data;</li> <li>▪ obtain the erasure of your personal data;</li> <li>▪ obtain the restriction of processing of your personal data;</li> <li>▪ to have rectification or erasure of your personal data communicated to each recipient to whom the personal data have been transferred;</li> <li>▪ claim compensation for the damage arising from the unlawful processing of personal data and</li> <li>▪ not to be subject to a decision based solely on automated processing.</li> </ul> <p>In order to exercise the aforementioned rights, please contact a proper Controller or its DPO using the contact details specified in sections: 'Controller' or 'Data Protection Officer' above.</p>
<b>Right to lodge a complaint with the supervisory authority</b>	You have the right to lodge a complaint with a competent supervisory authority.
<b>Information on profiling</b>	No profiling takes place with the use of your personal data.
<b>Automated decision-making</b>	We do not take decisions that are based solely on automated processing of your data which produce legal effects concerning you or similarly significantly affect you.
<b>Transfers outside: (1) the European Economic Area (EEA), (2) Türkiye.</b>	If your place of origin is EU or Türkiye, as a rule, your personal data are not transferred outside the European Economic Area (EEA) or Türkiye respectively. Such a transfer may, however, take place if you make an international visit in a country located outside the territory of your origin. We make every effort to ensure that data are transferred in compliance with the law and to implement suitable safeguards. In particular, this includes using standard contractual clauses approved by the European Commission and – in case of Turkey – standard contract for the transfer of personal data abroad. You may contact us in order to obtain a copy of the safeguards used. You may find the contact details in sections: „Controllers” or „Data Protection Officer” above.
<b>Provision of personal data</b>	The provision of data is voluntary but necessary to for the service to be provided. Failure to provide data will result in the inability to provide the service
<b>Privacy policy</b>	<p>In case of the following Controllers, additional information on the processing of personal data and on the rights of data subjects can be found in privacy policy available on their websites:</p> <p><b>Benefit Poland</b>  <a href="https://www.benefitsystems.pl/en/privacy-policy/">https://www.benefitsystems.pl/en/privacy-policy/</a></p> <p><b>Benefit Czechia</b>  <a href="https://multisport.cz/en/personal-data-protection/">https://multisport.cz/en/personal-data-protection/</a></p> <p><b>Benefit Croatia</b>  <a href="https://benefitsystems.hr/en/privacy-policy-for-multisport-card-users/">https://benefitsystems.hr/en/privacy-policy-for-multisport-card-users/</a></p> <p><b>Benefit Slovakia</b>  <a href="https://multi-sport.sk/ochrana-informacii/">https://multi-sport.sk/ochrana-informacii/</a></p> <p><b>Benefit Bulgaria</b>  <a href="https://benefitsystems.bg/en/gdpr_updated/">https://benefitsystems.bg/en/gdpr_updated/</a></p> <p><b>Benefit Türkiye</b>  <a href="https://benefitsystems.com.tr/en/privacy-policy/">https://benefitsystems.com.tr/en/privacy-policy/</a></p>