

## PRIVACY POLICY

**PragueCoding s.r.o.**, ID no. 07811225, with its registered seat at V Horkáč 1730/3, Nusle, 140 00 Praha 4 (“we”) provide platform SpeedReading.fun. The platform is available on the website <https://www.speedreading.fun/> (“platform”).

We recommend that you read this information carefully. If you have any questions, you can contact us at any time using the contact details below. As we are company located in European union, the processing of personal data is governed by 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 (“GDPR”).

In this privacy policy, we would like to inform you about how we process your personal data, how long we store them, with who we share your data and what are your rights.

### A. PERSONAL DATA PROCESSED

When you use platform, personal data necessary for mutual relationship will be processed. As we want to be as transparent as possible, we divided personal data that we process about you as personal data controller into these categories:

- **Identification information**, such as first and last name.
- **Contact info**, such as e-mail address of you or any of your worker.
- **Purchases information**, such as payments made, information about payment plan, information shared with payment provider.
- **Billing information**, such as seat information, reg. ID, VAT, address and other information necessary for accounting and tax purposes.
- **User content**, such as information about usage of the platform, excel reports and other activities possible in the platform.
- **Cookies data**, such as analytics data, marketing data, performance data, information to store your language preferences, safety data

Personal data may be gathered directly from you, or it may be gathered by your co-workers and other employees acting on behalf of company that ordered services of our platform. In such case, please refer to your company where you work for further information.

### B. PURPOSES OF THE PROCESSING OF PERSONAL DATA

We process your personal data as a data controller for the processing purposes, legal bases and periods set out below.

#### B.1 Provision of services

We primarily process personal data to provide you with services and to provide you with functionalities available in the platform. For this purpose, personal data is processed to authenticate you as the user, enable our features and services, secure payments, create user profile, perform customer support. As part of this, we

may also send you messages about the conclusion and performance of a contract, new product and service releases, payment reminders or approvals, etc.

For this purpose, we process these **categories of personal data**:

- Identification information, Contact info, Purchase information, Billing information, User content and Cookies data in the scope necessary to perform contract.

The **legal basis** for this processing is the performance of the contract between you and us and the need to take steps at your request before entering the contract. The legal basis for processing may also be our **legitimate interest**, if you are not the contracting party (you are creating profile on behalf of your company or you are other worker of the company).

The data are processed for the duration of the mutual relationship and for the period necessary for the performance of the obligations under such contract.

### **B.2 Internal records, statistics, and protection of our rights**

We may process your data for the purposes of keeping internal records within our company, recording payments made, producing statistical reports, protecting our rights and legal claims, and to ensure that you use platform in accordance with contractual terms.

For this purpose, we process these **categories of personal data**:

- Identification information, Contact info, Purchase information, Billing information, User content and Cookies data in the scope necessary to protect our claims.

The **legal basis** for this processing is our legitimate interest in keeping internal records, statistics, and the protection of our rights. The data is processed for the period necessary to protect our claims, for the period of statute of limitations.

### **B.3 Fulfilling legal obligations**

We may also process your personal data in order to comply with our legal obligations, particularly in the area of tax and accounting. At the same time, we need to be prepared to provide cooperation to state authorities if we are required to do so by law.

For this purpose, we process these **categories of personal data**:

- Identification information, Purchase information, Billing information.

The **legal basis** for this processing is the fulfilment of our legal obligations. The data is processed for the period required by law.

### **B.4 Promotion of services**

We may process the data you provide when you review, register, or purchase our products and services to inform you about our other products, services or promotions, news, announcements, new releases, etc. We may also process your personal data in cases in which you are not our customer, but we have gathered your e-mail address (e.g., when you fill our form on platform, we get your e-mail in other way).

For this purpose, we process these **categories of personal data**:

- Contact info and Identification information.

The **legal basis** for this processing is our legitimate interest in supporting and promoting our services (if you are our customer). The data is processed until you request that you do not want to receive newsletters, maximum up to duration of our platform. If you are not our customer, we process your personal data based on your **consent** with the same retention period.

In addition to objecting to the processing of data for this purpose (see D.7), you may opt out of receiving any newsletters at any time by using the unsubscribe links provided in the footer of each message sent. If the link is not provided, you may send e-mail with unsubscribe request on [info@speedreading.fun](mailto:info@speedreading.fun).

#### **B.5 Analysis of platform (analytics)**

With your consent, we may also process Cookies data for the purpose of analytics, which facilitates us to make more detailed analyses of your visits of the platform (analytical cookies), in which case your personal data may also be transferred to third parties. The legal basis for processing here is thus your consent if you are based in EU or legitimate interest if you are based in non-EU countries. The personal data is processed until your consent is withdrawn, but in any case, until a maximum of storage of each cookie stipulated in cookies list. In case of processing according to the legitimate interest, cookies are stored for the period of storage of each cookie stipulated in cookies list.

#### **B.6 Platform support and promotion (marketing)**

With your consent, we may also process information from cookies for this purpose, which facilitate our ability to get to know you better and to better target advertisements (marketing cookies), in which case your personal data may also be transferred to third parties. The legal basis for processing here is thus your consent if you are based in EU or legitimate interest if you are based in non-EU countries. The personal data is processed until your consent is withdrawn, but in any case, until a maximum of storage of each cookie stipulated in cookies list. In case of processing according to the legitimate interest, cookies are stored for the period of storage of each cookie stipulated in cookies list.

### **C. SHARING OF PERSONAL DATA**

We may share your personal data with other companies in our group who also process data in accordance with this document and helps us with better analytics.

At the same time, we may share personal information with third parties who help us with processing of personal data or we are obliged to share personal data. These parties act as our data recipients. Those data recipients may be:

- Google as a platform for providing analytics, storage services.
- Provider of CRM software.
- Provider of platform for sending newsletters.
- Providers of tools that are used for cookies (such as Meta, LinkedIn etc.).
- Provider of payment gateway.

In addition to this, if we process your personal data for fulfilling legal obligations, we may share your personal data with certain third parties as data controllers for this purpose where we are obliged to do so under applicable legislation (in particular, administrative authorities, police authorities and judicial authorities). Similarly, we may be obliged to share your data with persons who claim to have been harmed by your conduct.

Where we share your personal data with controllers and processors in third countries (outside the EEA), we only do so where there is a decision by the European Commission that a particular country outside the EEA provides an adequate level of data protection, including where controllers or processors have adopted additional data protection measures such as Binding Corporate Rules (BCRs) or Standard Contractual Clauses (SCCs).

#### **D. YOUR RIGHTS IN PROCESSING AND THE POSSIBILITY OF EXERCISING THEM**

Just as we have rights and obligations when processing your personal data, you have certain rights when processing your personal data as set out in the following paragraphs. You have the right to (i) request access to your personal data; (ii) withdraw your consent; (iii) request rectification of your personal data; (iv) request erasure of your personal data; (v) request restriction of the processing of your personal data; (vi) request portability of your personal data; (vii) object to the processing of your personal data; or (viii) lodge a complaint with the relevant supervisory authority. Specifics of the rights are stipulated in the Article 15 to 22 of the GDPR.

In all matters related to the processing of your personal data, whether it is a question, the exercise of rights, sending a complaint to our hands, etc., you can contact us at [info@speedreading.fun](mailto:info@speedreading.fun).

#### **E. RIGHT TO FILE A COMPLAINT**

In addition to the possibility of exercising your rights with our company, you can also file a complaint with the relevant supervisory authority, which is the Office for Personal Data Protection located at Pplk. Sochora 27, 170 00 Prague 7.

#### **F. CHANGES TO THIS INFORMATION**

This processing information is effective as of **January 10, 2026**. We are entitled to change this processing information from time to time, so please check it regularly. We will post any changes to this document on our website or via e-mail, if the change have large impact on personal data processing.