

INFORMATION ON PERSONAL DATA PROCESSING

MUNIPOLIS

14 April 2021

MUNIPOLIS s.r.o.

MUNIPOLIS s.r.o.

Londýnské náměstí 886/4, 639 00 Brno
www.munipolis.com

(A) This document**Summary – This document**

We take protection of your Personal Data very seriously! This document explains the manner, in which we may Process your Personal Data. This document may be changed or updated, so we ask you to regularly check for any updates.

This document is submitted by MUNIPOLIS s.r.o. on its own behalf, on behalf of its subsidiaries and affiliates (hereafter jointly referred to as “**MUNIPOLIS**”, “**we**”, “**us**” and “**our**”) and is designated to natural persons which interact with us, including customers, visitors of our product **MUNIPOLIS** (represented by www.munipolis.com), recipients of information of this communications ecosystem, as well as other users of our products or services (jointly referred to as “**End Recipient**”, “**you**” or “**your**” or “**Personal Data Subject**”). The defined terms used in this document are explained in section (U) below.

MUNIPOLIS serves as a tool for communication between the individual regional self-governing units (e.g. municipalities) or organizations on one side and citizens on the other, it is a software product designated for telephone networks, mobile app platforms (Android and iOS) and websites; the technical operator is **MUNIPOLIS**.

MUNIPOLIS allows registered users (from organizations selected by them):

- to receive information in the form of SMS, voice messages, e-mail or mobile app messages within an embedded app;
- to engage in polls, creation of participative budgets;
- to send incentives and responses.

ROLE OF MUNIPOLIS WITHIN MUNIPOLIS**What can be the roles of MUNIPOLIS within MUNIPOLIS?**

- **MUNIPOLIS** can be in the role of Personal Data **Controller**^[1];
- **MUNIPOLIS** can be in the role of **Technical processor**^[2];
- **MUNIPOLIS** can be in the role of **provider of services to persons**^[3].

How does it all work?

First of all, the End Recipient will register. Only data necessary for registration will be required within the registration process, i.e. **e-mail address** or **telephone number** (or both) and the **Municipality** (which they are interested in). Then the End Recipient's existence will be verified.

After successful identification of the **End Recipient** they will be able to select the individual **Municipalities**, which will be associated with the **End Recipient** in question in order to provide **MUNIPOLIS** services. In case the **End Recipient** selects the relevant **Municipalities**, they will be prompted to fill in certain data. This **data** will serve **exclusively the purposes specified by the scope of the consent** and only for **Municipalities**, which will be received within the frame of the applicable **consent**. Thereupon these **Municipalities** become the Personal Data **Controllers** of the relevant **End Recipient**.

In case the **Municipality** is active^[4] in time of the **End Recipient's** registration (or extension of the required **Municipalities** by the End Recipient), the **Municipality** becomes an additional Personal Data **Controller** immediately.

In case the selected **Municipality** becomes active^[5], such **Municipality** will assume the role of an additional Personal Data **Controller** of the relevant **End Recipient** (such **End Recipient** may be prompted to fill in additional data). When granting the consent the **End Recipient** declares that they are aware of the limitation, according to which they must be at least **16 years of age** at the moment of granting the consent; if they are not, the consent must be granted by their **legal**

guardian (their father, mother or another guardian). When granting their **consent** the **End Recipient** will also declare that they are not circumventing this limitation in any way.

Realization of Rights of Data Subjects

The **End Recipient** is entitled to realize rights arising from GDPR towards the relevant organization, either individually (this, however, only affects the organization in question, not any others), or to selected organizations (then it affects all the relevant organizations).

Contact information of the **Data Protection Officer** are listed in section (S).

This document may be amended or updated to reflect changes of our procedures in the area of Personal Data Processing, or as the case may be, other relevant legislation. We recommend that you read this document carefully and regularly check this website for any changes that we may implement in compliance with the terms and conditions of this document.

(B) Collection of Personal Data

Summary – Collection of Personal Data

We may collect or acquire Personal Data directly from you, e.g. within the frame of our relationship with you; when you publish your Personal Data etc.

We may collect Personal Data about you from the following sources:

- **Data provided by you:** We may acquire your Personal Data when you provide it to us (typically each time we send a message or receive an incentive, additionally also if we perform any activity for you or when you contact our operators). We can process your Personal Data when you raise an inquiry or when you contact us by e-mail or by other means (electronically or in documentary form).
- **Data provided by a third party:** We may collect or acquire your personal data from third parties, which provide it to us, in particular within the frame of exercising the function of Processor.
- **Data on our relationship:** We may collect or acquire your personal data within our regular relationship with you (e.g. provision of MUNIPOLIS services to you).
- **Data published by you:** In some cases we may collect or acquire your Personal Data that you have clearly decided to publish.

(C) Creation of Personal Data

Summary – Creation of Personal Data

We may create Personal Data about you (e.g. records on your interaction with us).

We can also create Personal Data about you, such as records on your interactions with us and data on your history or preferences.

(D) Categories of Personal Data which we can process

Summary – Categories of Personal Data which we can process

We can process: your identification data (e.g. name); demographic data (e.g. your sex, age); your contact data (e.g. your residence address, telephone number, e-mail address); records on your provided consents; information on your interactions with MUNIPOLIS services; any opinions you provide within the MUNIPOLIS services. An important factor for deciding which data we can process is, whether we are in the position of Personal Data Controller or whether we have received consent with Personal Data processing, or whether we, in the position of Personal Data Processor, are authorized by the competent Personal Data Controller (e.g. Municipality) to process Personal Data.

We can Process the following categories of Personal Data about you (always applicable):

- **Contact data:** mobile phone number, e-mail address.
- **Records on granted consents:** Records on any consent that you may have granted, along with the date and time, manner of granting the consent and any associated information (e.g. subject of consent, IP address etc.).
- **Interaction-related data:** token; e-mail; mobile phone; date and time of activities associated with executing the request; request status; IP address.
- **Website-related data:** type of device; operation system; browse type; browser settings; IP address; language settings; date and time of access to the Website; user name; password; secure login data; data on use; aggregate statistical information.
- **Personal Data which you provide to us in the course of mutual communication:** Any data that you provide to us in the course of electronic or documentary communication, which you exchange with us (e.g. e-mail, data mailbox).

We can Process the following categories of Personal Data about you (applies to a case, where you provided us consent with Personal Data Processing, or where we, in the position of Personal Data Processor, are authorized to process your personal Data by another Personal Data Controller (Municipality)):

- **Data about you:** name and surname.
- **Demographic data:** sex; date of birth.
- **Contact data:** address; telephone number; e-mail address.
- **Records on granted consents:** Records on any consent that you may have granted, along with the date and time, manner of granting the consent and any associated information (e.g. subject of consent, IP address etc.).
- **Interaction-related data:** e-mail; mobile phone number; date and time of activities associated with execution of requests; request status; IP address.
- **Website-related data:** type of device; operation system; browse type; browser settings; IP address; language settings; date and time of access to the Website; user name; password; secure login data; data on use; aggregate statistical information.
- **Personal Data which you provide to us in the course of mutual communication:** Any data that you provide to us in the course of electronic or documentary communication, which you exchange with us (e.g. e-mail, data mailbox).

- Date and time of registration; date and time of registration for each Municipality; source of registration for each Municipality (FE, app, admin); relationship to the Municipality (resident/non-resident), interest groups (areas); consent (scope, fate and time of conclusion, IP address), withdrawn consent (date and time, identification of the person withdrawing the consent); technical and tune-up parameters - error reporting (browser, IP address, OS, date and time, device type, User ID, if applicable); FB token; OS and its version; mobile phone model; log of message opening; click log, log out log; record of Data Subject location (GPS, date and time); photograph – photo reports.

(E) Legal basis for Personal Data Processing:

Summary – legal basis for Personal Data Processing

We can process your Personal Data in case that you have granted us your previous express consent; Processing is necessary for the purpose of an agreement between you and us; Processing is necessary to protect your vital interests or vital interests of another person; Processing is required based on the applicable law; or we have a valid and legitimate interest in the Processing.

In the course of Personal Data Processing in relation to the purposes stated herein we can, depending on the circumstances, rely on any of the legal bases referred to below:

- Consent: We can Process your Personal Data, if we acquired your express consent with the Processing (this legal basis is used in relation to Processing that is completely voluntary – it is not used for Processing that is necessary or mandatory in any other respect);
- Performance of Agreement: We can Process your Personal Data, if the Processing is necessary in relation to any agreement, which you may conclude with us; we rely on this legal basis e.g. in case we provide services or if we mail you in relation to our agreements;
- Protection of vital interests: We can process your Personal Data, if the Processing is necessary in relation to any matter or event that threatens or harms your vital interest, in particular health or life;
- Legitimate interest: We can Process your Personal Data if we have a legitimate interest in Processing your Personal Data, i.e. if there is a legitimate and justifiable reason, why the Processing should be done; when using this basis, we always assess whether your interests or fundamental rights and freedoms requiring Personal Data protection take precedence over our legitimate interest or not.

(F) Sensitive Personal Data

Summary – Sensitive Personal Data

We are not trying to collect or otherwise Process your Sensitive Personal Data.

We are not trying to collect or otherwise Process your **Sensitive Personal Data** within our regular activities. However, we are unable to influence processing of such data, which is for instance sent to us, or in cases where such data is inserted into the **MUNIPOLIS** system by third parties.

(G) Purposes for which we can Process your Personal Data

Summary – Purposes, for which we can Process your Personal Data

We can Process your Personal Data for the following purposes: provision of products and services to you; improvement of security of our customers; operation of our Website; communication with you; administration of our IT systems; conducting surveys; ensuring security of systems; conducting investigations, as necessary; and improvement of our Website.

We may Process your Personal Data for the following purpose:

(applies to all cases)

- Sending crisis messages: Shutdowns and failures of utility networks; traffic information (closures, accidents); weather warnings; pandemic information.

We may Process your Personal Data for the following purposes:

(applies to cases, where you granted us consent with Personal Data Processing, or where we, in the role of Personal Data Processor, were authorized to Process your Personal Data by another Personal Data Controller {Municipality}):

- Provision of Products and Services: Provision of our products or services upon request or without request; communication with you regarding such products and services.
- To improve services for the End Recipient: We may use your Personal Data to improve our services.
- To provide services to the End Recipient: to help you resolve any issues.
- To manage requests of End Recipients: To provide you the best possible services.
- To confirm your eligibility: In case that some of our services or content are designated only to a certain group of End Recipients, we need to Process your Personal Data in order to find out, whether such products or content are designated for you.
- Verification of End Recipient: Verification of End Recipient and whether they have contact means (e-mail, mobile phone).
- Our website: Operation and administration of our Website; provision of content, communication and interaction with you through our Website; and notification to you about changes of our Website, our products or services.
- Communication: Communication with you through any means (also including e-mail, telephone, text messages, voice messages, mobile app, social media, mail or in person) regarding news notifications and other information you may be interested in, whereas all such notifications must be provided to you in compliance with the applicable legislation; maintaining and updating of your contact information, as necessary; and obtaining your previous optional consent, as necessary. Communication with you (from your side) related to obtaining incentives and other information that may be important to you.
- Communication and IT operation: Operation of IT system; and IT security audits.
- Surveys: Your involvement for the purpose of obtaining your opinions about our services.
- Security: Electronic security (including records on login history and access data).

- **Investigation:** Detection, investigation and prevention of violation of rules and criminal activities in compliance with the applicable legislation.
- **Trial or administrative proceedings:** Proving, exercising and defending statutory rights.
- **Improvement of our Website and Products:** Identification of problems associated with our Website or our products; planning of improvements to our Website or our products; and creation of new Websites or products.

(H) Disclosure of Personal Data to Third Parties

Summary – Disclosure of Personal Data to third parties

We may disclose your Personal Data to: courts or administrative authorities; our external Personal Data Processor and to sub-contractors of our Processor; any person as necessary in connection to any trial or administrative proceedings; any person as necessary for the purpose of investigation, detection or prevention of crime, based on an order issued by the competent authority or court; any acquirer of our enterprise; and to any external providers of any plug-in modules or content on our Website.

We may disclose Personal Data to other entities within the frame of **MUNIPOLIS** in compliance with the applicable legislation. A comprehensive list of entities within **MUNIPOLIS**, which may have access to Personal Data, is available in the IT section.

In addition to that we may disclose Personal Data to:

- you or your authorized representatives
- courts and administrative authorities upon request, based on a legal obligation or order of the competent authority, or for the purpose of reporting information or suspected violation of the relevant law or other regulation;

If we involve an external Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations:

- (i) Process Personal Data only in compliance with our previous instructions; and
- (ii) adopt measures to protect confidentiality and security of Personal Data, along with any other requirements according to the applicable legislation.

(I) Profiling

Summary – Profiling

Processing of your Personal Data may involve automated decision-making, including Profiling.

Processing of your Personal Data may involve / does not involve automated decision-making, including Profiling, which is done for the following purposes:

Profiling activity	Reasons for profiling activity	Consequences for you
Approaching End Recipients of a non-registered municipality	We analyze, whether there are any End Recipients, who are registered with a previously non-registered Municipality, which has now been registered, so that the End Recipients may join and fill in the relevant data.	You will receive a notification that the relevant Municipality has been registered and that you may sign-in to this Municipality, if you grant it your consent with Personal Data Processing

(J) Transfer of Personal Data Abroad

Summary – Transfer of Personal Data Abroad

We do not transfer your personal data outside the EU (EEA).

We do not transfer any of your personal data outside the EU (EEA).

(K) Data Security

Summary – Data Security

We have adopted appropriate technical and organizational measures to protect your Personal Data.

We have adopted appropriate technical and organizational measures to protect your Personal Data against accidental or illegal destruction, loss, change, unauthorized disclosure, unauthorized access, as well as other illegal or unauthorized forms of Processing, in compliance with the applicable legislation.

The technical and organizational measures are recorded in our documentation.

(L) Accuracy of Data

Summary – Accuracy of Data

We take all necessary steps to make sure your Personal Data is accurate and up to date and that it is erased or corrected in case we find out it is inaccurate. Please notify us in case your Personal Data in our possession is inaccurate or outdated.

We take all reasonable steps to make sure that:

- your Personal Data Processed by us is accurate and updated, as necessary; and
- any of your Personal Data Processed by us that is inaccurate (with regard to the purpose of Processing), is immediately erased or corrected.

We may request you to confirm the accuracy of your Personal Data. You can contact us at any time with a request for correction or erasure of inaccurate Personal Data. For more information see the section dedicated to your statutory rights.

(M) Minimization of Data

Summary – Minimization of Data

We take all reasonable steps to limit the amount of your Personal Data Processed by us to a necessary volume.

We take all reasonable steps to make sure that your Personal Data Processed by us is limited to Personal Data justifiably required in relation to the purposes specified in this document.

(N) Data Storage

Summary – Data Storage

We take all reasonable steps to make sure that your Personal Data is stored only for the period, for which it is necessary in relation to any statutory purpose.

We take all reasonable steps to make sure that your Personal Data is processed only for the minimum period, which is necessary to fulfil the purposes specified in this document.

The storage period of your Personal Data is governed by the following criteria:

(1) We will retain copies of your Personal Data in a form allowing identification only for a period, for which:

(a) we maintain an active relationship with you (e.g. when we provide services to you or when we have a long term active relationship), or

(b) your Personal Data is needed in relation to statutory purposes according to this document (e.g. when you contact our assistance service and we have legitimate interest in processing the data in question in order to provide you the most appropriate assistance and to improve our products and services),

plus:

(2) for a period of:

(a) duration of any applicable limitation period (i.e. any period, during which any person could raise a legal claim against us in connection to your Personal Data, or any authority could initiate administrative or other proceeding, for which your data could be relevant); and

-
- (b) additional two (2) months after such limitation period expires (in order to provide us with a reasonable time to identify Personal Data concerned by a claim raised by any person at the end of the limitation period, or in case any authority initiates any legal proceeding, to make sure we still have the relevant documentation in our possession),
-

and:

- (3) we may continue to Process your Personal Data for such additional necessary period as necessary in case any relevant legal claims are raised or any other legal procedure is applied against us.
-

In the course of the periods referred to in paragraph (a) and (b) above we will limit the processing of your Personal Data to storage and continued security of such data, with the exception of cases, where it is necessary to assess it in connection to any legal claim or obligation according to the applicable legislation.

As soon as the periods under paragraph (1), (2) and (3) above expire, each in the stated extent, we will either:

- permanently erase or destroy the relevant Personal Data; or
- perform anonymization of the relevant Personal Data.

(O) Your statutory rights

Summary – Your statutory rights

According to the applicable legislation you may have a number of rights concerning the Processing of your Personal Data, including: the right not to provide your Personal Data to us; right to access your Personal Data; right to request rectification of inaccuracies; right to request erasure or restriction of Processing of your Personal Data; right to raise an objection against Processing of your Personal Data; right to request transfer of your Personal Data in the relevant extent to another Controller; right to withdraw consent; and the right to file a complaint against the Processing of your Personal Data to the Office for Personal Data Protection. We may ask you for a proof of identity before the fulfillment of your rights.

According to the applicable legislation you may have a number of rights concerning the Processing of your Personal Data, including:

- the right not to provide us your Personal Data (however, please note that we may not be able to provide you with all the benefits associated with our Websites, our products or services, if you do not provide us your Personal Data – e.g. we may not be able to execute your orders without the necessary data); in case of non-provision of contact data (e-mail address or telephone number) it will be impossible to perform the necessary verification, and as such this data is required as essential;
- the right to access your Personal Data or the right to request copies thereof, along with information on the nature of Processing and notification of the relevant Personal Data;
- the right to request rectification of any inaccuracies in your Relevant Personal Data;
(note: you may change your personal data in your account settings on the website or in the mobile app)
- the right to request on legitimate grounds:

- erasure of your Relevant Personal Data; or
- restriction of Processing of your Relevant Personal Data;
- the right to have certain of your Relevant Personal Data transferred to another Controller in a practicable extent in a structured, commonly used and machine-readable form;
- the right not to be subject to a decision based exclusively on automated processing, including Profiling, which has legal consequences for you or similar material effects;
- the right to contact the Data Protection Officer;
- in case we process your Personal Data based on your consent, the right to withdraw consent (whereas withdrawal of the consent will not affect the legitimacy of any type of Processing realized before the day we received your notice of withdrawal of your consent, and it does not prevent Processing of your Personal Data based on other available legal grounds);
- the right to file objections against Processing of your Relevant Personal Data to the Office for Personal Data Protection (in particular the Office for Personal Data Protection).

We individually notify you that you have the right to raise an objection on legitimate grounds against the Processing of your Relevant Personal Data on our part or on our behalf, including direct marketing.

This is without prejudice to your statutory rights.

If you wish to assert any of these rights, or if you have any questions regarding these rights or any other provision of this document, or regarding the Processing of your Personal Data, please contact us via the contact information provided in section (S) below; *We advise you that:*

- before realizing these rights we may ask you to prove your identity;
- in case your request requires verification of other facts (e.g. establishing whether the Processing violates the applicable legislation), we will look into your request in a reasonable time before deciding on further procedure; and
- in case the processing on our part is based on our statutory obligations, we may not be able to grant your request.

(P) Cookies and Similar Technologies

Summary – Cookies and Similar Technologies

We may Process your Personal Data by placement or reading Cookies and similar technologies.

When you visit any Website, we may place Cookies (small data file) to your device or read Cookies already placed there, always with your consent, if necessary according to your applicable legislation. We use Cookies to record information on your device, browser and in some cases also preferences and browsing habits. This may include analysis of how the visitors interact with our Website to allow us to improve your experience, to provide you with more relevant content and offer you more relevant services.

We can process your Personal Data through Cookies and other technologies.

(Q) Terms of Use

MUNIPOLIS s.r.o.

Londýnské náměstí 886/4, 639 00 Brno
www.munipolis.com

Summary – Terms of Use

All usage of our Website is fully compliant with the documents at <http://www.munipolis.com>

All usage of our Website, our products or services is fully compliant with the documents at <http://www.munipolis.com>. We recommend that you regularly check these documents for any changes that we may implement.

(R) Direct Marketing**Summary – Direct Marketing**

We can Process your Personal Data to contact you with information on MUNIPOLIS products and services. You can opt out at any time free of charge.

We can Process your Personal Data to contact you via e-mail, telephone, by advertising notification or in another notification form and provide you with information on MUNIPOLIS products and services. We can send you information on our products and services, planned promotion events, as well as other information that may interest you, using the contact information you provided to us, in each case in compliance with the applicable legislation.

(S) Our contact information and contact information of the “Data Protection Officer”**Summary – Our contact information and contact information of the “Data Protection Officer”**

You can contact us (in writing, by telephone, e-mail, data mailbox) or the Data Protection Officer (by e-mail).

You may contact us on the contact information below with any comments or doubts regarding the information stated in this document, or as the case may be, with any other questions regarding Personal Data Processing, which we do ourselves or have it done by sub-contractors.

MUNIPOLIS s.r.o.

COMPANY ID: 29198950

Address: Londýnské náměstí 886/4, Štýřice, 639 00 Brno

Tel.: +420 533 533 355

e-mail: info@munipolis.com

Data mailbox: nbnbjm

MUNIPOLIS s.r.o.

Londýnské náměstí 886/4, 639 00 Brno
www.munipolis.com

Data Protection Officer:

Name: Mgr. Ing. Jaromír Škára

e-mail: dpo@munipolis.com

(T) List of Personal Data Controllers, Processors and Technical Processors**Summary – list of Personal Data Controllers, Processors and Technical Processors**

List of organizations that may participate in the processing of your Personal Data.

PERSONAL DATA CONTROLLER

MUNIPOLIS s.r.o.

COMPANY ID: 29198950

Address: Londýnské náměstí 886/4, Štýřice, 639 00 Brno, CZ

Tel.: +49 1573 5989224

e-mail: info@munipolis.com

Data mailbox: nbnjnm

PERSONAL DATA PROCESSORS

MUNIPOLIS s.r.o.

Londýnské náměstí 886/4, 639 00 Brno
www.munipolis.com

TECHNICAL PROCESSORS

iMakers, s.r.o. , Company ID: 292 28 875, Purpose: Provision of support for the MUNIPOLIS app

(U) Definition of Terms

- **“Sensitive Personal Data”** or “Personal Data of special categories” means Personal Data concerning racial or ethnical origin, political views, religious beliefs or philosophical beliefs or membership in union organizations, physical or mental health, sex life or conviction in criminal cases on criminal offenses, both alleged and real, national ID number or any other information considered sensitive according to the applicable legislation.
- **“Cookie”** means a small file placed into your device during your visit to certain websites (including our Website). Reference to “Cookies” in this documents also includes analogical technologies, such as web beacon and clear GIF.
- **“EEA”** means European Economic Area.
- **“Personal Data”** is information about an identified or identifiable natural person, which can be directly or indirectly identified, in particular by reference to a certain identifier, e.g. name, ID number, location data, web identifier or one or more special characteristics of physical, physiological, economic, cultural or social identity of this natural person.
- **“Profiling”** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements;
- **“Relevant Personal Data”** means Personal Data, in relation to which we act as the Controller.

- **“Controller”** or **“Personal Data Controller”** means the entity that decides how and why Personal Data will be Processed. In many jurisdictions the Controller bears the primary responsibility for compliance with the applicable legislation on Personal Data Protection.
- **“Technical Processor”** means any person or entity that provides services/solutions, with which the Controller or Processor processes Personal Data of the Controller.
- **“Office for Personal Data Protection”** means an independent public administration authority that is authorized by law to supervise compliance with the applicable legislation on personal data protection.
- **“Process”, “Processing”** or **“Processed”** means any operation which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **“Processor”** means any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).
- **“Website”** means any website operated or maintained by us or that is operated or maintained on our behalf.

[1] In order to secure the operation of **MUNIPOLIS** it is necessary to process personal data associated with keeping record of the activities and behavior of the End Recipient, which affect recording of expressions of will of the End Recipient, namely in case no **Municipality** was selected, or if the given **Municipality** is not registered as active within **MUNIPOLIS**.

[2] In order to secure the operation of **MUNIPOLIS** it is necessary to process personal data associated with keeping record of the activities and behavior of the End Recipient, which affect recording of expressions of will of the End Recipient, namely in case the Data Subject selected a **Municipality**, which is active within **MUNIPOLIS**, whereas the **Municipality** is the Personal Data **Controller** and **MUNIPOLIS** is the Technical Processor of Personal Data.

[3] In case **MUNIPOLIS** is granted the appropriate consent with personal data processing, it may perform the activity in question as the **Municipalities**.

[4] I.e. it is registered with the **MUNIPOLIS**.

[5] I.e. it is registered with the **MUNIPOLIS**.