

KUBINSKA-SCENA.LIFE · PRIVACY POLICY

Effective from 24 October 2026 · version 1.0 · under Regulation (EU) 2016/679 (GDPR) and Act No. 18/2018 Coll. on the Protection of Personal Data.

This policy covers Chat.Kubinska-Scena.Life on the (matrix) protocol and the Kubinska-Scena.Life website: pre-registration, membership, payments, invoices and the chat itself. For the rehearsal room, the Elevator_Studios.DK privacy policy applies.

1. Who processes your data

The Hemp Cooperative, družstvo

Registered office: Pohronský Bukovec 42, 976 62 Pohronský Bukovec, Slovakia

Company ID (IČO): 51 026 775

Registered in the Commercial Register of the District Court Banská Bystrica,

Section Dr, Insert No. 522/S

Data contact: Office@Kubinska-Scena.Life

We are not required to appoint a data protection officer (DPO).

2. What data we process, why and for how long

We only collect what we need for your membership, your invoice and the chat. We don't need your real name.

2.1 Pre-registration

- Data: the email address and the name or nickname you send us.
- Why: to let you know when the chat launches.
- Legal basis: steps taken at your request before entering into a contract (Art. 6(1)(b) GDPR).
- How long: until the chat launches. We then send you one message and delete the pre-registration within 30 days.

2.2 Membership and account

- Data: email address, chat address (@name:kubinska-scena.life), display name and password. You choose the name and password yourself.
- Why: to send you a one-time link to create your account, your invoice and payment reminders, and to match your payment to your account.

- Legal basis: performance of a contract (Art. 6(1)(b) GDPR).
- How long: for as long as your membership lasts and 10 days after the end of the paid period. Data that appears on an invoice is kept as long as the invoice (2.4).
- You can use an alias or an anonymous mailbox as your email address. It has to work, though, so that the link, the invoice and the reminder reach you.

2.3 Payment

- Data: amount, variable symbol, payer's name, the account the payment came from and the message for the recipient.
- Why: to match the payment to your membership and, if you withdraw, to refund the money to the right account.
- Legal basis: performance of a contract and a legal obligation (Art. 6(1)(b) and (c) GDPR).
- How long: as long as accounting records (2.4).
- We don't collect payment card details. You pay by QR code (PAY by square) from your own bank.

2.4 Invoice

- Data: email address, amount, payment date and membership period. If you pay as a company or sole trader (SZČO), also the business name, address, Company ID (IČO), Tax ID (DIČ) and VAT ID (IČ DPH).
- Why: the Accounting Act and the VAT Act require it.
- Legal basis: legal obligation (Art. 6(1)(c) GDPR).
- How long: 10 years from the end of the year in which the invoice was issued.

2.5 Chat

- Data: encrypted messages and files, room membership, the times messages were sent and delivered, and the devices you sign in from.
- Why: to deliver messages and keep them in sync across your devices.
- Legal basis: performance of a contract (Art. 6(1)(b) GDPR).
- How long: according to the room settings, at most until your account is closed.
- Messages are end-to-end encrypted. The keys are only on your devices and we cannot see the content of your messages.

2.6 Chat server logs

- Data: IP address and app type when you sign in and connect.

- Why: server security and protection against abuse.
- Legal basis: legitimate interest (Art. 6(1)(f) GDPR).
- How long: 90 days.

2.7 Referring a new member

- Data: the chat address of the member who referred the new member.
- Why: to extend the referring member's membership by one month (Terms and Conditions, Article A7).
- Legal basis: performance of a contract (Art. 6(1)(b) GDPR).
- How long: for as long as the referring member's membership lasts.

2.8 Email

- Data: what you write to us, and your contact details.
- Why: to deal with your question, your withdrawal or your data request.
- Legal basis: performance of a contract or our legitimate interest in replying to you (Art. 6(1)(b) and (f) GDPR).
- How long: 1 year after the matter is closed. If the message belongs to an invoice, as long as the invoice.

2.9 Website

- When you visit the website, the hosting provider keeps standard server logs: IP address, time, page and browser. They are used for the security and operation of the website. Legal basis: legitimate interest (Art. 6(1)(f) GDPR). How long: only briefly, under the hosting provider's rules.
- The website uses no cookies, analytics or tracking scripts and loads nothing from third-party domains.

2.10 End of membership

- 7 days before the paid period ends, we remind you to pay by email and with a notice in the chat.
- If you don't renew within 10 days after the period ends, or if you withdraw from the contract, we permanently delete your account: we redact your messages on the server, delete your uploaded files, profile and password, and our billing system forgets which account belonged to your email address.
- We can't delete copies of messages that other members have saved on their own devices. Invoices are kept separately as the law requires.

3. What we don't process

- The content of your messages. The server only stores encrypted messages and cannot read, filter or analyse them.
- Your real name, birth number (rodné číslo) or identity document.
- Payment card details.
- Special categories of data under Art. 9 GDPR, such as health data.
- No automated decisions are made about you. Payments that don't match are checked by a person.

4. Who else can access the data

We don't sell or rent your data or use it for advertising. It only goes to these recipients:

- The bank that holds our account. It processes payment data as an independent controller.
- ESOX CONSULTING, s.r.o., 29. augusta 31, Banská Bystrica, Company ID (IČO) 44 874 481: keeps our accounts and archives our records. It processes them in the EU under a data processing agreement.
- Hostinger International Limited, 61 Lordou Vironos, 6023 Larnaca, Cyprus: hosting of the Kubinska-Scena.Life website and the Office@Kubinska-Scena.Life mailbox, in a data centre in Germany (Frankfurt). It is a processor under Art. 28 GDPR on the basis of its terms of service.
- FEEL WELL, s.r.o., Radlinského 1727/49, 026 01 Dolný Kubín, Company ID (IČO) 55 799 582: under a data processing agreement, provides us with storage for our records in Google Workspace (Google Ireland Limited). We will move the records to our own server later.
- We run the (matrix) chat and the billing system ourselves, on our own server in Slovakia. The server is closed, with no federation: no data goes to other (matrix) servers.
- Public authorities, where the law requires it.

5. Transfers outside the EU

Chat data never leaves our server in Slovakia. We process all other data in the EU and the EEA. Google (via FEEL WELL), Hostinger and their sub-processors may process some data outside the EEA, for example in the USA. They only do so with the safeguards required by the GDPR, that is under a Commission adequacy decision or standard contractual clauses.

6. Your rights

- Access: you can ask what data we hold about you and get a copy (Art. 15 GDPR).
- Rectification: we correct inaccurate data and complete incomplete data (Art. 16 GDPR).
- Erasure: we delete whatever we don't have to keep by law, including full deletion of your account (Art. 17 GDPR).
- Restriction of processing (Art. 18 GDPR).
- Portability: you get the data you gave us in a machine-readable format (Art. 20 GDPR).
- Objection to processing based on legitimate interest (Art. 21 GDPR).
- Where we process something based on your consent, you can withdraw it at any time. This doesn't affect what we did before.

Write to Office@Kubinska-Scena.Life. We reply within one month. For complex requests we may extend this by two more months, and we will tell you why.

7. Security

- Messages, calls and files in encrypted rooms are end-to-end encrypted (Olm/Megolm).
- The website, the chat and the payment page only use encrypted connections (HTTPS).
- The server is closed, with no federation, so there are fewer places to attack.
- Only people who need it for their work have access to the server. We back up the server regularly.
- We will never ask you for your chat password or payment card details.
- The payment QR code is only created on our website when you place your order.
- If a personal data breach occurs, we report it to the Office for Personal Data Protection of the Slovak Republic within 72 hours of finding out. If you face a high risk, we tell you too.
- Got a strange message in our name? Forward it to Office@Kubinska-Scena.Life.

8. Supervisory authority

If you think we handle your data in breach of the law, you can lodge a complaint with:

Office for Personal Data Protection of the Slovak Republic
(Úrad na ochranu osobných údajov Slovenskej republiky)
Hraničná 12, 820 07 Bratislava 27, Slovakia
dataprotection.gov.sk · statny.dozor@pdp.gov.sk

9. Changes to this policy

When the way we handle data changes, we update this policy. The version on the Kubinska-Scena.Life website applies. We tell you about any significant change by email and with a notice in the chat.

Kubínska Scéna · The Hemp Cooperative, družstvo ·
Office@Kubinska-Scena.Life
Dolný Kubín, 24 October 2026