

Information on the processing of personal data under Regulation (EU) of the European Parliament and of the Council 2016/679 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 (hereinafter referred to as "GDPR"), and the instruction of data subjects

Elektrizace železnic Praha a.s.

With registered offices at Prague 4 – Nusle, nám. Hrdinů 1693/4a, post code 140 00

Company ID: 471 15 921

Company entered in the Commercial Register maintained by the City Court in Prague, Section B, file no 1809 (hereinafter "EŽP a.s.")

The company, as a personal data controller, in accordance with Article 12 of the GDPR, hereby informs about the processing, method and scope of processing of personal data, including the scope of the data subject's rights related to the processing of their personal data by EŽP a.s.

EŽP a.s. processes personal data in accordance with the law of the European Union and the Czech Republic, in particular in accordance with the international treaties to which the Czech Republic is bound, in particular in accordance with the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data No. 108, promulgated under No. 115/2001 Coll., and in accordance with the relevant national legislation, in particular Act No. 110/2019 Coll, on the protection of personal data and on the amendment of certain laws, as amended (hereinafter referred to as the "PDPA") and Regulation (EU) No. 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 referred to as the "Regulation") and other legal regulations.

Purpose and scope of personal data processing:

EŽP a.s. only processes accurate personal data that it has obtained in accordance with the PDPA or the Regulation, and EŽP a.s. collects and processes such personal data always in a fair, lawful and transparent manner, for the stated purpose for which the personal data was collected only, to the extent necessary, for the period of time specified below, as a rule for the duration of the employment relationship and subsequently for the period of time for which the controller is obliged/entitled to keep the data in accordance with the legal regulations; the same applies if the employment relationship with the employee is not concluded on the basis of a contract or agreement. Personal data shall always be processed in such a way that it is adequately secured and protected against unauthorized or unlawful processing and against accidental loss, destruction or damage.

Basic purposes of personal data processing by EŽP a.s.:

- a) fulfilment of a service provision agreement;
- b) performance of operational activities (legal employment related, wage accounting, bookkeeping related etc.);

- c) tax accounting and settlement;
- d) receivable enforcement;
- e) meeting legislative obligations;
- f) direct marketing (information and product campaigns) by EŽP a.s.;
- g) protection of persons and property.

The legal basis for the processing includes (but is not necessarily limited to):

- a) consent of the data subject with the processing of their personal data;
- b) contract implementation;
- c) fulfilment of legal duty;
- d) protection of vital interests of data subjects;
- e) legitimate interest of the controller.

Scope of data processing by EŽP a.s.:

- a) **identification data**: academic degree, first and last name, date of birth, identity card number, birth certificate number
- b) **address data**: permanent residence, temporary residence, delivery or contact address, collection point address, phone, -email address;
- c) **other personal data**: bank account number, other personal data following from a particular contract or from the law

Sources of personal data:

EŽP a.s. obtains personal data mainly from the data subject in the context of negotiations on the conclusion of an employment contract or agreements, or from third parties.

EŽP a.s. always informs data subjects whether the provision of personal data is a legal or contractual requirement, when the provision of personal data is necessary for the provision of a specific service and when it is voluntary, but the provision of such personal data will facilitate mutual communication between the data subject and EŽP a.s. and will also significantly improve the effectiveness of the mutual employment relationship. The data subject is always informed of the fact that automated decision-making, including profiling, is taking place.

EŽP a.s. also obtains personal data from public records, from state administration authorities or on the basis of special legal regulations.

In order to improve the quality of services, objectivity, verifiability and security, EŽP a.s. monitors and records communications with data subjects (mainly telephone calls to dispatch lines or contracting lines).

In order to ensure the safety of EŽP a.s. and the safety of persons and property on the premises of EŽP a.s. and the services provided, CCTV systems are installed in buildings managed or owned by the EŽP a.s. Group. Data subjects are always informed of the location of the CCTV systems by means of information signs and pictograms when entering such premises. The records from the CCTV systems are archived for the necessary period of time and are not further processed beyond the stated purpose.

Data processors and recipients:

In addition to EŽP a.s. and its employees, personal data may also be processed by the Processors of EŽP a.s. for the purposes described above on the basis of personal data processing agreements concluded in accordance with the Personal Data Protection Act and the Regulation.

Personal data processors of EŽP a.s. include (but may not necessarily be limited to):

- a) companies of EŽP a.s. group (viz. www.elzel.cz),
- b) suppliers or service providers,
- c) providers of CCTV, access and attendance systems installed on the premises of EŽP a.s. group companies,
- d) other persons in connection with contract execution, administration and archiving, including related document management,
- e) persons providing services to EŽP a.s. if the client decides to utilize these services,
- f) other third parties providing or receiving services in connection with fulfilment of contractual or legal duties by EŽP a.s.

EŽP a.s. processes personal data manually as well as automatically. Personal data protection is secured by technical and organizational measures taken by EŽP a.s. in compliance with the PDPA and the Regulation. The same security is required by EŽP a.s. from its Data Processors.

EŽP a.s. shall notify the data subject of those personal data breaches that are likely to result in a high risk to the rights and freedoms of natural persons, subject to the exceptions specified directly in the Regulation.

EŽP a.s. informs that personal data may be transferred to third parties who have the legal authority to require the transfer of the personal data in question upon a lawful request.

Personal data processing periods:

In accordance with the time limits specified in the relevant contracts or the duration of their effectiveness, with the time limits specified in the controller's shredding rules or in the relevant generally binding legal regulations of the Czech Republic, whereby personal data will always be processed for the time strictly necessary to ensure the rights and obligations arising from these legal documents.

Data subjects' rights:

The data subject is entitled to request information about the processing of his or her personal data, the purpose of the processing of personal data, the scope or categories of personal data subject to processing, the sources of the personal data, the period for which the personal data will be stored, the nature of automated processing, the processors, the recipients, and, if applicable, the categories of recipients of the personal data, and the fact that automatic decision-making, including profiling, is taking place.

If the data subject has given consent to the processing of his or her personal data, he or she shall have the right to withdraw that consent at any time, without prejudice to the lawfulness of the processing based on the consent given prior to its withdrawal.

Within the meaning of Articles 16 to 22 of the Regulation, the data subject has the right to rectification of inaccurate personal data or completion of incomplete personal data, the right to erasure of personal data for the reasons set out in the Regulation with specified exceptions, the right to restriction of processing for the reasons set out in the Regulation. Any rectification or erasure of personal data or restriction of processing shall be notified by EŽP a.s. to the individual recipients to whom the personal data have been disclosed, where possible and reasonable.

Furthermore, the data subject has the right to data portability to another controller.

The data subject shall have the right to object to processing of personal data concerning him or her on the basis of Article 6(1)(e) or (f) of the Regulation, including profiling based on these provisions. Where personal data is processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which shall include profiling insofar as it relates to such direct marketing.

The data subject shall have the right not to be subject to any decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

Information provision

EŽP a.s. will provide the requested information upon request without undue delay including provision of one copy of the personal data processed free of charge. For additional copies, it may charge a fee reflecting the administrative costs associated with providing the requested information or communication or taking the requested action, at a reasonable charge not exceeding the costs necessary to provide such information.

In the event that a data subject becomes aware or believes that the EEA Inc. or an EEA Inc. contracted Processor is carrying out processing of personal data that is contrary to the protection of the privacy and personal life of the data subject or contrary to law, the data subject shall be entitled to:

- (a) request an explanation from the EŽP a.s. or its contracted Processor;
- b) request that the EEA a.s. or its contracted Processor remedy the situation; in particular, the data subject is entitled to request the blocking, rectification, erasure (to be forgotten), restriction of processing, completion or destruction of the personal data;
- c) request access to the personal data from the EŽP a.s., in particular information on what data about the employee is processed by the EŽP a.s.;
- d) the right to object to the processing of his/her personal data;
- (e) to obtain the personal data concerning him or her in a structured, commonly used and machine-readable format and the right of the data subject to transmit such data to another controller.

EŽP a.s. always informs the data subject without undue delay about the processing of his/her request. The data subject has the right to address his/her complaint to the Office for Personal Data Protection at any time.

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