

Information Memorandum - CHEIRÓN a.s., with registered office at Kukulova 24, Břevnov, 169 00 Prague 6 (hereinafter referred to as the Personal Data (PD) Administrator)

WHAT ARE PERSONAL DATA AND HOW ARE THEY PROTECTED

The protection of natural persons in relation to the processing of personal data is a fundamental right. Article 8(1) of the Charter of Fundamental Rights of the European Union and Article 16(1) of the Treaty on the Functioning of the European Union grant everyone the right to the protection of personal data concerning him or her. The processing of personal data of natural persons ('citizens', 'data subjects') by PD Administrator is carried out for the benefit of such persons. However, the right to the protection of personal data is not an absolute right; it must be considered in the context of its function in the company and balanced with other fundamental rights in accordance with the principle of proportionality.

The PD Administrator processes personal data and other information concerning citizens and other data subjects within the scope of its independent and delegated competence. Thus, most of the personal data of the subjects are processed on the basis of obligations imposed on the PD Administrator by specific laws or contracts. Such processing of personal data on data subjects is not subject to the obligation to obtain the consent of such persons. If some personal data are processed outside the legal obligation, then such processing is subject to the consent of citizens. However, such processing is only carried out by the PD Administrator in exceptional cases (e.g. when organising events where prior registration is required).

The protection of natural persons applies to both automated processing of personal data and manual processing. In the principles and rules for the protection of natural persons applied by the PD Administrator in connection with the processing of personal data of citizens (natural persons), the PD Administrator respects their fundamental rights and freedoms, in particular the right to the protection of personal data. The PD Administrator respects the rights of citizens that are guaranteed by law, such as the right to know and be informed, in particular, about the purpose for which personal data are processed, or the period for which they will be kept. The Privacy Policy applies to all information relating to an identified or identifiable natural person. The PD Administrator lawfully processes personal data because such processing is necessary for the performance of tasks carried out in the public interest or in the exercise of official authority vested in the PD Administrator, or because of the legitimate interests of the PD Administrator or of a third party. The PD Administrator processes personal data of citizens according to the purposes of processing in accordance with the applicable legislation for the protection of personal data, in particular Act No 101/2000 Coll., on the protection of personal data, as amended, and EU Regulation 2016/679 (General Data Protection Regulation - GDPR). Nevertheless, each subject concerned has the right to object to the processing of personal data relating to his or her particular situation. The PD Administrator of the Personal Data shall then demonstrate to the subject the relevance and legitimacy of the interests of the PD Administrator which do not interfere with the interests or fundamental rights and freedoms of the citizen.

HOW WE PROCESS PERSONAL DATA

The processing of personal data by the PD Administrator is carried out in a lawful and fair manner, is transparent to citizens (or other natural persons) and the information and all communications relating to the processing of such personal data are easily accessible, understandable and provided in clear and plain language. Where personal data are processed on the basis of the consent of a natural person, such persons shall be made aware of possible risks arising from the processing, as well as the rules, safeguards and rights

that exist in relation to the processing of their personal data. The purposes for which the personal data are processed are unambiguous and legitimate and are established at the time of collection of the personal data. The scope of the personal data collected is always proportionate, relevant and limited to the data necessary to fulfil the stated purpose. Also, the period for which personal data are kept is limited to the necessary minimum. In all processing of personal data, measures are applied to guarantee the appropriate security and confidentiality of the data (e.g. to prevent unauthorised access to personal data and to the equipment used to process them).

The PD Administrator, as the controller of personal data, has responsibility for any processing of personal data and has put in place appropriate and effective technical and organisational measures to ensure the protection of personal data, based on an assessment of the likely and serious risks of the processing in question. The measures for the security of personal data also include regular training of employees who process personal data of natural persons. Employees at all levels are required to be responsible, proactive and creative and to respect the rules of the personal data security systems.

In connection with the transition to the new legislation for the protection of personal data in the EU, i.e. EU Regulation 2016/679 (GDPR), the PD Administrator has carried out a new assessment of the impact of all processing on the protection of personal data in order to assess the specific likelihood and severity of risks. In making this assessment, the PD Administrator has taken into account the nature, scope, context and purposes of the processing and the sources of the risks. The measures for the security of systems, information, data and personal data and the specific technical, organisational and security measures adopted and refined continuously by the PD Administrator to ensure compliance with the EU Regulation are newly elaborated in this context in the internal documents and directives of the PD Administrator. These measures include the appointment of a Data Protection Officer.

WHICH PERSONAL DATA WE PROCESS

Selection procedure for a job position

- Purpose of processing: registration of applicants for selection procedures according to Act No 312/2002 Coll., on officials of territorial self-government units and on amendments to certain acts, as amended, and Act No 553/1991 Coll., on municipal police
- Categories of personal data: address and identification data; sensitive data - criminal activity
- Data subject category: customers (clients) of the PD Administrator
- Categories of data recipients: PD Administrator
- Data retention period: 5 years

Personnel and salary agenda

- Purpose of processing: ensuring employment relations and all related obligations under the Labour Code and related laws (in particular taxes, social and health insurance)
- Categories of personal data: address and identification data; sensitive data - health
- Data subject category: employees of the PD Administrator + persons with other relationship to the PD Administrator
- Categories of data recipients: PD Administrator + other recipients - legal entities in the Czech Republic

- Data retention period: up to 50 years according to the filing system

Public procurement

- Purpose of processing: order execution, conclusion of contracts and orders
- Categories of personal data: address and identification data
- Data subject category: customers (clients) of the PD Administrator
- Categories of data recipients: PD Administrator
- Data retention period: 10 years

Occupational Health and Safety, Injury Book and Injury Records

- Purpose of processing: occupational health and safety, fire protection and related activities
- Categories of personal data: name, surname, degree, date of birth, signature
- Data subject category: subjects - employees
- Categories of data recipients: internal recipient - PD Administrator, external recipients - Municipality (internal audit, controlling), Regional health station, Inspectorate of the Czech School Inspection, State Labour Inspection Office, Regional Labour Inspectorate, Other authorised institutions on the basis of requests.
- Data retention period: Injury Book - 5 years, Injury Records - 10 years

Accounting

- Purpose of processing: accounting processing
- Categories of personal data: address and identification data; contractual data - name, surname, telephone/email in cases where it is a natural person
- Data subject category: citizen
- Categories of data recipients: internal recipient - Company + external recipients: supervisory authorities
- Data retention period: archiving period of accounting documents

Property and operating records of loans

- Purpose of processing: procedure according to laws and regulations on property registration
- Categories of personal data: address and identification data
- Data subject category: subjects - persons responsible for the loaned property
- Categories of data recipients: PD Administrator
- Data retention period: 1 year

Agenda for the sale of services and goods

- Purpose of processing: sale of goods and services (cash, online)
- Categories of personal data: address and identification data; contractual data - name, surname, phone /email
- Data subject category: citizen
- Categories of data recipients: internal recipient - Company + external recipients: supervisory authorities
- Data retention period: archiving period of accounting documents

Internet sales of services and goods

- Purpose of processing: internet sales of services (invoice, cash, on-line)
- Categories of personal data: address and identification data; contractual data - name, surname, phone /email, contact persons, IP address, cookies, location data
- Data subject category: citizen
- Categories of data recipients: internal recipient - Company + external recipients: supervisory authorities
- Data retention period: archiving period of accounting documents

Agenda of indirect sales of services and goods through partners

- Purpose of processing: indirect sale of services (invoice, cash, on-line)
- Categories of personal data: address and identification data; contractual data - (registration number and VAT number in case of a natural person with a business activity), billing address, telephone, email, delivery address
- Data subject category: citizen
- Categories of data recipients: internal recipient - Company + external recipients: supervisory authorities
- Data retention period: archiving period of accounting documents

Marketing

- Purpose of processing: marketing, promotional, recruitment events
- Personal data category: marketers
- Data subject category: name, surname, email, telephone
- Categories of data recipients: internal - Theatre
- Data retention period: for the duration of the consent to processing

Property protection - camera system

- Purpose of processing: protection of property
- Category of personal data: image record

- Data subject category: person who is in the camera area
- Category of data recipients: the Police of the Czech Republic
- Data retention period: 14 days

DATA PROTECTION OFFICER OR DPO

Our Company is not required to establish a Data Protection Officer (DPO).

UPDATE

We review this Information Memorandum on an ongoing basis and may change it from time to time (primarily to comply with data protection laws and practices).

The last change was made on 18/03/2022