

## PASSING INFORMATION - GDPR – contractual partners

(GDPR – General instructions for the protection of personal data – EU)

### **Subject – „seele pilsen s.r.o.“ – contractual organisation / personal data processor passes the information below:**

The processing and handling of personal data according to the 'European Parliament and Council Directive (EU) no. 2016/679 art. 5 and art. 24 on physical entities protection in relation to personal data processing and on free transfer of the data (GDPR). On 25.5.2018, company „seele pilsen s.r.o.“ issued the regulation on personal data processing and protection – Conduct Codex within GDPR. This internal regulation also treats the necessary personal data protection and processing which the organisation processes about the suppliers, customers, and subjects of third parties based on a contractual relation. The regulation was issued mostly for defining the purpose for personal data processing, the definition of tools and methods for personal data processing, and documenting technical and organisation measures to provide the personal data protection. The internal regulation is included in the integrated quality management system. (IQMS)

### Receiving PD

The organisation / processor receives the above PD directly from the contracting parties. The organisation informs the subject of PD on the matters related to the PD processing above the scope of the defined data at the moment the PD is received, it must request explicit consent with the processing. External monitoring of the premises within the organisation with camera system is not used for monitoring the subjects' PD but for the protection of the facility against theft and vandalism. The protected area is marked.

### Rights of PD subjects

The personal data subjects are entitled to access the personal data which the organisation processes.

a) Right to access information:

- On the purpose of processing, PD categories, PD recipient, planned period of storage

b) Law:

- Request for information on the personal data processing
- Objections to personal data processing
- Request for the copy of personal data
- Request for the removal of defective state during personal data processing
- Request for the transfer of personal data
- Explicit consent with PD processing
- Complaint at the supervision office can be applied by any person

c) The right to be forgotten:

- Deleting the data copies, including potential completed backup of the data, prevention of the data leaving the company

## Saving PD

Organisational-legal documents:

- The relevant data file is saved after the termination of contractual relation for potential court disputes (legal recommendation) – 12 years (in relation to contracts – it is subject to the warranty period of the contract)
- The relevant data file is saved after the termination of contractual relation for potential court disputes (legal recommendation) – 4 years (without the relation to the contract)
- Monitoring kamerovým systémem:
- automatic 7 – daily cycle; transcript of the oldest records

## PD destruction

Reason for the disposal:

- Personal data is no longer required for the defined purposes
- Data subject introduces justified objections against the PD processing
- Personal data were processed illegally
- Your PD must be deleted to fulfil the legal obligations defined in the law of the EU or member state related to the administrator.

The exceptions from the right of the subject for deleting:

- Processing required for the fulfilment of legal obligations required by processing according to EU or member state law subject to the administrator or the fulfilment of a task completed in the public interest or in case of public force assigned to the administrator
- Processing required due to public interest in the public health area in compliance with the European Parliament and Council Directive (EU) 2016/679 according to art.9 clause 2 letter h) and i) and art. 9, section 3)
- Processing required for the performance definition or the justification of legal tasks

## Personal data protection

Everybody bound by confidentiality considering personal data or safety measures, he/she is individually notified of the obligations, and also informed on the legal matters for personal data protection.

Personal data include:

- Maintained in writing and secured by locking in the processing location
- In electronic form within IS and in the form of work data saved on the server in special sector U: and G: ... Daily backup of the server.

## Access is provided via authorised user names and access passwords

It is prohibited to pass the company data to unauthorised persons and it is not permitted to save company data to private exchange storages.

## Safety incident

Supervision body in CR: Office for personal data protection (OPDP).

The cooperation between the EU offices is provided by: European unit for personal data protection.

It depends on the specific type of danger and on the evaluation of your personal data administrator considering the sufficiency of the measures.

The review on the processing of personal data (PD) of the 'suppliers':

<p><b>Legal reason for PD processing</b> The processing is required for the contract fulfilment with the contracting party being the data subject.</p> <p><b>Purpose – Fulfilling the contractual obligations:</b></p> <ul style="list-style-type: none"> <li>▪ obligation to complete tasks or services (organisation and production documentation)</li> <li>▪ registry of suppliers</li> <li>▪ evaluation of the suppliers</li> <li>▪ supplier offer / contract / order / delivery load</li> <li>▪ invoicing</li> </ul>		<p><b>Handling:</b> Collection, Recording, validation /inspection, use, Accessibility, Limitations, Blocking, Transfer, Viewing, Archiving, liquidation</p>	
<b>OÚ</b>	<b>PD Category</b>		
	<b>General</b>		<b>Special category</b>
name	X		
Surname	X		
Title	X		
Work position	X		
Language skills	X		
Work address	X		
Work telephone	X		
Work email	X		
CRN / BN (trade certificate)	X		
<p><b>Legal reason for PD processing</b> Data subject assigns a consent with the PD processing for individual cases</p> <p><b>Purpose - Presentation:</b></p> <ul style="list-style-type: none"> <li>▪ -work tasks and authorisation of the operation and contract documentation abroad</li> <li>▪ photos and videos for the purpose of presentation on web pages and intranet pages and company magazine</li> </ul>		<p><b>Handling:</b> Collection, Recording, validation /inspection, use, Accessibility, Limitations, Blocking, Transfer, Viewing, Archiving, liquidation</p>	
<b>OÚ</b>	<b>PD Category</b>		
	<b>General</b>		<b>Special category</b>
name	X		
Surname	X		

Title	X		
Language skills	X		
Work position	X		
Work address	X		
Work telephone	X		
Work email	X		