

# Information for employees

**As the administrator of your personal data (hereinafter referred to as the “employer”), we provide to you the following information.**

## Introductory information

As an employee, you have received information that is intended to serve several purposes. You will learn which of your data we process and why we do so. You will also learn about the rights that you have in connection with personal data processing, i.e. what you can request from us and to whom you can turn with your suggestions and complaints, if you have any. Therefore, we request that you carefully read the following text.

## Which of your personal data do we process?

Please bear in mind that, in order for our employment relationship to exist, we must process a large quantity of your personal data. The scope of such data is determined particularly by the law, performance of the contract and our legitimate interest, which will be described below.

- **identification data:** name, surname, title, birth-registration number if one has been assigned to you; otherwise your date of birth, place and country of birth, address of permanent residence, nationality, number and period of validity of your identity document, gender, social-insurance number, identification of your health insurer, employee number.
- **contact information:** personal data that enables us to contact you, particularly your contact address, telephone number and e-mail address.
- **payroll data:** particularly your bank-account number, wage amount and information that is critical for calculating your wage, bonuses, travel and other expenses, wage deductions (including information on distraintment and insolvency).
- **tax data:** particularly information and documents demonstrating entitlement to deduction of the non-taxable part of the tax base, tax credits and entitlement to tax benefits, i.e. for example, information on the employee’s marital status and children, birth-registration number, student certificate, confirmation of placement of the employee’s child/children in preschool and confirmation from a labour-union organisation on the amount of paid membership dues.
- **data associated with performance of work:** data associated with performance of work, which is understood to be your attendance and presence at work, drawing of vacation time and compensatory leave, data on fulfilment of your work obligations and evaluation thereof, information and documents on your education and completed trainings, information on your clean criminal record, benefits, records on breach of work obligations if any, information and documents (certificates) on qualification to perform work.
- **security and system data:** particularly your system login data, access-card number, identification data of items and equipment entrusted to you (e.g. computer, mobile telephone, automobile), localisation data of the automobile and/or mobile telephone entrusted to you, identification of remote connection, information on access to applications and systems.

- **information on health condition:** data necessary for fulfilment of the employer's statutory obligations, which refers particularly to information on work-related injuries and occupational illnesses and physical disabilities.
- **other personal data:** photographs, recordings from camera systems and, as the case may be, recordings of telephone calls that we are obligated to monitor pursuant to the law.

## Why do we process your data? What authorises us to process your data? How long do we retain your data?

As your employer, we process your personal data for various purposes and in a varying scope. The legal grounds by which we are authorised to process personal data comprise, in a number of cases, fulfilment of contractual obligations arising from the employment relationship, obligations imposed on us by legal regulations, our legitimate interest in such processing and, in certain cases, your consent to processing of personal data. We obtain the largest quantity of your personal data directly from you and, as the case may be, from publicly available sources such as public registers (e.g. the Commercial Register, Insolvency Register).

### Processing of sensitive personal data

As mentioned above, in certain situations we are authorised to process data on your health condition. We are directly authorised to conduct such processing by legal regulations governing the area of labour law, particularly Act No. 262/2006 Coll., the Labour Code, which imposes the obligation to keep documentation on work-related injuries and occupational illnesses, and Act No. 435/2004 Coll., on Employment, which imposes on employers the obligation to keep records on employed persons with health disabilities.

For these purposes, we retain personal data in the necessary scope for a period of up to 30 years following the end of the accounting period in which the employment or similar relationship was terminated. Because we are required by law to conduct such processing, you cannot raise objections against such processing, as we are obligated to process such data.

### Processing of other personal data

#### Processing of personal data on the basis of performance of an employment contract

We process a full range of your personal data, as the processing of such data is necessary for performance of the employment contract. On the basis of performance of the contract, we process your identification data, contact and payroll data, and data associated with the performance of work. The purpose of processing such data consists in the establishment, course and termination of the employment relationship. If we could not process such personal data, it would not be possible to cooperate with you.

Based on performance of the contract, we process your personal data for the period of duration of the employment relationship.

## Personal data processing on the basis of legitimate interest

In certain cases, we process your personal data on the basis of our legitimate interest. Also in this case, this involves processing of your identification, contact and payroll data, as well as data associated with the performance of work and security and system information. We process all such data for the following purposes:

- assurance of proper relations with employees – here our legitimate interest consists in determination and inspection of due fulfilment of your work obligations.
- protection of property and persons – here our legitimate interest consists in security of the premises, records of items and equipment entrusted to you, prevention of damage.
- protection of our legal claims – here our authorised interest consists in determining, exercising and defending the organisation's interests.

For the purposes defined above, we process your personal data for the period necessary for implementation of the rights and obligations arising from the employment relationship and for the period of the statute of limitations (maximally ten years following termination of the employment relationship). Please bear in mind that if court, administrative or other proceedings are initiated, we will process your personal data in the necessary scope for the full period of duration of such proceedings.

You have the **right to raise objections** against such processing; you can learn more about such right below.

## Processing of personal data on the basis of fulfilment of legal obligations

As an employer, the law imposes on us a large number of obligations for the fulfilment of which it is necessary to process your personal data. On this basis, we process your identification and contact data, payroll and tax information and data associated with the performance of work in order to comply particularly with the following legal regulations:

- Act No. 262/2006 Coll., the Labour Code (for example, this act imposes the obligation to maintain a logbook of work-related injuries and to ensure provision of occupational medical examinations for employees).
- Act No. 435/2004 Coll., on Employment (this act imposes the obligation to keep records on employed persons with health disabilities).
- Act No. 592/1992 Coll., on Public Health Insurance Premiums, and Act No. 48/1997 Coll., on Public Health Insurance (this act imposes the obligation to report the employee's entry into employment, change of his/her health insurer, etc.).
- Act No. 582/1991 Coll., on the Organisation and Implementation of Social Security (this act imposes the obligation to make a copy of the registration document).
- Act No. 187/2006 Coll., on Sickness Insurance (this act imposes the obligation to report the employee's entry into employment, change of his/her data, etc.).
- Act No. 586/1992 Coll., on Income Tax (this act imposes, in particular, the obligation to withhold tax from the income of natural persons).
- Act No. 563/1991 Coll., on Accounting (this act imposes, in particular, the obligation to keep accounting records, which may also include payroll records).
- Act No. 373/2011 Coll., on Specific Healthcare Services (this act imposes on the employer an obligation in the area of occupational medical examinations for employees).

For these purposes, we retain personal data in the necessary scope for a period of up to 30 years following the end of the accounting period in which the employment relationship was terminated.

### Processing of personal data on the basis of consent

If none of the situations set forth above applies and none of the stated legal grounds for processing your personal data apply to us, we are authorised to process your data only on the basis of consent to personal data processing that you grant to us. Such consent is granted in written form and for precisely defined purposes. Consent must always be given of your own free will, i.e. you will not in any case be forced to grant consent. This may involve, for example, consent to the publishing of your photograph for marketing purposes.

### In what form is my personal data processed?

We process your data in electronic and paper form.

### To whom can we provide your personal data?

We administrate your personal data within our organisation, whereas we transfer such data to third parties with your consent as a matter of principle. In certain cases, however, we are forced to transfer your personal data to other recipients even without your consent.

In certain cases, we are obligated to transfer your data to other entities on the basis of the law. This particularly refers to disclosure of your data to bodies of the state administration (particularly social-security bodies and the labour office) and health-insurance companies. For fulfilment of statutory conditions, we transfer your personal data to courts, bodies active in criminal proceedings and supervisory bodies if they require that we do so.

In certain cases, we also use external contractors that provide various services. Processing of certain of your personal data may occur in the course of the activities that they conduct for us. External contractors are in the position of processors and have a concluded written contract with us that binds them to comply with strict principles when handling your data. In such a case, your consent is not required for the purposes of carrying out processing activities, as such processing is directly allowed by a legal regulation. Please be aware that we select our contractors according to strict criteria and you thus need not be concerned about your data.

As a matter of principle, we do not transfer your personal data abroad. This may happen only exceptionally if you grant us consent for such transfer or if it is required by a legal regulation.

### What rights do you have in relation to your personal data?

As a data subject, the law confers on you a full range of rights. Because an employment relationship would essentially be impossible without the processing of personal data, certain of your rights are limited by the law. At the same time, as an employee, you have the obligation to provide your data do us in defined cases.

## Right of access to personal data

Of course, you have the right to know the kind of data pertaining to you that is being processed, the purpose and duration of such processing, where we obtained the data and whether and to whom we transfer the data. At the same time, you have the right to information on other rights pertaining to such data. This document in particular serves for your awareness in this regard; nevertheless, we are prepared to provide you with confirmation or clarification regarding any item of this information.

If you request it from us, we will also provide to you, without undue delay, a copy of your processed personal data. In connection with administrative costs, we are authorised to charge a proportionate fee for such copy, especially in the case that it is requested repeatedly. If you submit the request in electronic form, we will automatically assume that you are interested in provision of information also in electronic form. However, you have the option of requesting provision by other means. Please bear in mind that the rights of other persons cannot be adversely affected by the right to obtain a copy of processed personal data.

## Right to correction of personal data

In the event you determine that the personal data that we process in relation to you is not accurate or complete, you have the right to request that we supplement or correct such data without undue delay.

## Right to restriction of personal data processing

In certain cases, this right enables you to demand that certain items of your personal data be marked for restricted processing and thus not be the subject of further processing for a certain period. This is not the same as the right to deletion, as restriction of processing is not permanent. You have the right to demand restriction of the processing of your personal data in the case that:

- you refute the accuracy of your data that we are processing; restriction will be imposed for the period necessary to verify the accuracy of the data.
- processing is without a legal basis (e.g. beyond the scope of data that we are authorised to process), but you prefer restriction of processing instead of deletion because, for example, you anticipate that you will provide the data to us in the future.
- we no longer need to process your personal data, but you request the data for the purpose of determining, exercising or defending your legal claims.
- you raise an objection against processing (see the point of instruction on this right below).

If processing is restricted, data can be processed only with your consent or for the purpose of determining, exercising or defending legal claims, for the purpose of protecting the rights of another entity, whether a natural person or legal entity, or for important reasons in the public interest.

## Right to raise objections against personal data processing

**You can exercise the right to raise objections against the processing of personal data only in the situation when we would process any of your personal data in the public interest or on the basis of our legitimate interests or for the purposes of direct marketing. In such cases, you can raise an objection at any time. If that happens, we will further process your personal data only if we demonstrate serious, legitimate reasons for doing so (particularly if we need the data for determining, exercising or defending our legal claims). If, however, you raise an objection against data processing for the purpose of direct marketing, we will cease processing your data for such purpose without delay.**

In the case of an employment relationship, we process your personal data as described above on the basis of the law or of a contract in the majority of cases. Therefore, this right does not apply to you in certain cases.

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### Right to file a complaint with the supervisory authority

Exercising the rights set forth above shall not in any way affect your right to file a complaint with the Office for Protection of Personal Data via the contact information set forth in the introduction to this document. You can find the current contact information on the website of the Office for Protection of Personal Data ([www.uoou.cz](http://www.uoou.cz)). You can file a complaint at any time when you have doubts as to whether your personal data is being processed as it should be, i.e. if you believe your personal data is being processed without authorisation or in conflict with legal regulations.

### Right to deletion

In certain cases, you, as the data subject, have the right to have your personal data deleted. We generally accede to deletion of your personal data when we no longer need such data or we do not have a legal reason to process it. Furthermore, we will delete your personal data if it was processed on the basis of consent and that consent has been withdrawn.

Please bear in mind that, even though this concerns one of the reasons for deletion, it does not mean that we will immediately delete all of your personal data. This right does not apply in the case that processing of personal data continues to be necessary for fulfilment of our legal obligations, archiving purposes, scientific or historical research or for statistical purposes, or for determining, exercising or defending our legal claims. In the case of an employee and the numerous statutory obligations relating to the processing of the employee's data, the exercise of this right is significantly restricted.

### Right to withdraw consent

If this involves cases in which your personal data is processed on the basis of consent, you further have the right to withdraw your consent at any time. However, previous processing that we carried out prior to withdrawal of consent shall not be affected in any way by such withdrawal of consent.

## How can individual rights be exercised?

In all matters associated with the processing of your personal data, whether that involves an enquiry, exercise of rights, filing of a complaint or anything else, you can contact our data protection officer using the following methods:

- by post or in-person upon prior agreement at the address EUC a.s., Evropská 859/115, 160 00 Prague 6
- by e-mail at the e-mail address **dpo@euc.cz**
- by telephone at +420 731 546 921 from 9:00 a.m. to 3:00 p.m. (not by SMS)

We will handle your request without undue delay, though within one month at the latest. In exceptional cases, particularly due to the complexity of your request, we are authorised to extend this period by two months. Of course, we will inform you of any such extension and the rationale for it.