

# **Personal data processing policy of the company of Centrála cestovního ruchu Olomouckého kraje, s.r.o.**

These are the principles adopted by the company of Centrála cestovního ruchu Olomouckého kraje, s.r.o., VAT:CZ08658251 (the "Company") regarding the processing and protection of personal data in terms of the GDPR and in accordance with the applicable law of the Czech Republic, in particular Act No. 110/2019 Coll. on the processing of personal data with effect from 31 March 2019, as amended. The Policy provides information on the basic principles according to which the Company processes the personal data of Cardholders and partners of the Olomouc region Card system and other persons ("data subject"), on the Company's approach to processing, protecting and ensuring the security of the personal data of data subjects.

## **1. Introduction**

1.1. In its role as data controller, the Company processes the personal data of data subjects within all its core activities by means of a security measure such as controlled access to such information.

1.2. As of 31 March 2019, the Company processes the personal data of subjects in accordance with the effectiveness of Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (the General Data Protection Regulation), which is directly applicable in all EU Member States (General Data Protection Regulation "GDPR"). Furthermore, the Company processes the personal data of data subjects in accordance with Act No. 110/2019 Coll. on the processing of personal data and with effect from 31 March 2019.

1.3 The Company processes personal data and fulfils the obligations of a data controller or data processor as set out in applicable law.

1.4. The personal data subject provides the Company with their personal data depending on the purpose of its processing, in particular and exclusively concerning the stipulation of the purposes of the processing of personal data:

- a) for providing the Company's services, including the provision of the "ORC".
- b) for the purpose of the legitimate interests of the Company or a third party, for the protection of its own rights and claims.
- c) for the performance of an agreement between the partner and the Company and the fulfilment of legal obligations, including the needs of records and statistics.
- d) for the purpose of registration in the ORC programme and related services with the activation, issuance and provision of the ORC, the online shop.
- e) communication with customers, suppliers, contractors and trading partners.
- f) for the purpose of arranging rentals or bookings.
- g) for training activities.

- h) for promotional and marketing activities.
- i) to ensure internal processes for the security and protection of personal data, payroll and personnel management and the resulting obligations of the Company's accounting.
- j) for other purposes with the subject's consent to the processing of their personal data.

1.5. Consent to the processing of personal data is given by the data subject in the event that no other legal title can be used for the purpose of processing. The Company accepts the data subject's consent as a free, specific, informed and unambiguous expression of will by which the data subject provides their consent to the processing of their personal data by declaration or other manifest confirmation (e.g. by entering into an agreement). The data subject has the right to withdraw their consent at any time. Withdrawal of consent shall not affect the legality of the previous processing of the subject's personal data based on previously granted consent. The data subject will be informed of this before giving their consent.

## **2. Purpose of processing the personal data of personal data subjects**

2.1. The personal data of personal data subjects must be collected only for specified, explicit and demonstrable purposes and may not be further processed in a way that is incompatible with these purposes. The processing of personal data is carried out in particular to cover the main activities of the Company and for the purpose of processing referred to in point 1 of this Personal Data Processing Policy, which are in particular production, trade and services not listed in Annexes 1 to 3 of the Trade Licensing Act, the activities of accounting advisors, bookkeeping, tax record keeping and others.

2.2. The Company also processes the personal data of the subjects to ensure its contractual and other relationships, accounting, human resources and payroll, recruitment and other activities directly related to the Company's core business and defined in the Company's internal Personal Data Protection Guideline.

## **3. Categories of processed personal data**

3.1. The Company collects, processes and stores the following categories of personal data of the subjects, the composition of which is always determined by the necessity of processing personal data according to the defined purpose of processing personal data for a given data subject:

3.1.1. address, contact and identification personal data – in particular: first name, surname, date of birth, birth number, residence, telephone number, email address, correspondence address, citizenship, ID number, passport number, driving licence number, bank account number, data box, personal experience, education.

3.1.2. descriptive personal data – in particular: data of the subject relating to the contractual relationship, such as, in particular, and in addition to the personal data already mentioned in point 3.1.1. VAT number, address of registered office and business premises, etc.

3.1.4. special categories of personal data, in particular sensitive data of the data subject.

3.1.5. other personalised data – in particular, photographs or CCTV footage, biometric data, physiological data, payment data and data associated with registration and partnership in the ORC programme, such as authentication data, ORC account details and other essential data.

#### **4. Method for the processing and storage of personal data and the period of its storage with the Company**

4.1. The company processes the subject's personal data manually or in an automated manner and stores it securely in paper or electronic form for the period of time specified in the archiving, filing and shredding regulations. In connection with the purpose of processing, some personal data of the subject is kept in the Company's information system (e.g. the ORC operating system, economic and information system, archiving system, booking portal, etc.).

4.2. The Company processes personal data in a manner that ensures its appropriate safeguarding by means of security measures in place against unauthorised or unlawful processing and against accidental loss, destruction or damage, for example by means of controlled access to such information, the encryption and anonymisation of personal data, the ability to restore the availability of personal data or, for example, by means of regular audits of the security measures in place.

#### **5. Transfer of personal data**

5.1. The Company does not transfer personal data to persons other than personal data processors or personal data controllers (where this obligation is imposed by a contractual relationship with the controller, processor or sub-processor), unless the obligation to transfer it to authorities, offices or institutions is imposed on the Company by law or the data subject has provided their consent to said transfer.

5.2. The processing of personal data by the Company, the controller of personal data, does not involve automated decision making on the basis of which actions or decisions are taken that would interfere with the rights or legitimate interests of data subjects.

#### **6. Rights of the personal data subject**

6.1. Upon request, the data subject shall receive from the Company, unless specified in the request, all information about the processing of their data in a concise, comprehensible and easily accessible manner using clear and plain language.

6.2. An application may be made by electronic means, by submission via data box or postal service provider, or by an oral submission on record with the Company; an application may not be made by telephone.

6.3. Where personal data relating to the data subject is obtained directly from the data subject, the Company shall provide the data subject with the following information at the time of obtaining the personal data:

a) the identity and contact details of the controller, b) the contact details of the data protection officer, c) the purposes for which the personal data is intended and processed and the legal

basis for its processing, d) the legitimate interests of the controller or of a third party where the processing is based on this legal title, e) the recipients or categories of recipients of the personal data, if any, including the processor, f) the controller's intention, if any, to transfer personal data to a third country or an international organisation, including a reference to the appropriate guarantee, g) the period for which the personal data will be stored with the Company or, if this cannot be determined, the criteria used to determine this period, h) the existence of the right to request from the Company access to, rectification or erasure of, or restriction of the processing of personal data relating to the data subject and to object to processing, as well as the right to data portability, i) where the processing is based on the data subject's consent, the existence of the right to withdraw consent at any time, without prejudice to the legality of the processing based on consent given prior to its withdrawal, j) the possibility of lodging a complaint with the oversight authority, k) whether the provision of the personal data is a legal or contractual requirement or a requirement to be included in a future agreement and whether the data subject is under an obligation to provide the personal data, and the possible consequences of not providing the data, l) whether automated decision making, including profiling, takes place and, at least in such cases, meaningful information regarding the procedure used as well as the significance and foreseeable consequences of such processing for the data subject.

6.4. If the Company intends to further process the personal data for a purpose other than the purpose for which it was collected, it will provide the data subject with information about this other purpose prior to said further processing.

6.5. The Company does not have to provide the data subject with information about processing if and to the extent that the data subject already has said information.

6.6. If the personal data has not been obtained from the data subject, the Company shall provide the data subject with the same information, plus the source from which the personal data originated and, where applicable, information on whether the data originates from publicly available sources.

6.7. The Company will not apply the information obligation in the event of personal data being obtained from someone other than the data subject, unless the provision or disclosure is expressly provided for by a legal regulation applicable to the Company and which lays down security and organisational measures for the protection of the legitimate interests of the data subject.

6.8. A data subject who discovers or believes that the Company, as the controller, or another person who processes personal data for the Company, is processing their personal data in breach of the Data Protection Regulation or in breach of their legal obligations in the area of data protection may request an explanation or demand that the Company or the processor remedy the situation. If the Company or the relevant processor does not comply with the request, the data subject may turn to the Office for Personal Data Protection, without prejudice to the right of the data subject to turn directly to the Office for Personal Data Protection.

6.9. The data subject has the following additional rights:

1. to obtain from the Company, if the conditions for this are met, information about the processing of their personal data (information about the identity and contact details of the controller and its possible representative; contact details of the data protection officer (DPO), the purposes of the processing for which the personal data is intended and the legal basis for the processing; possible recipients or categories of recipients of the personal data and other

information essential for ensuring transparent and correct processing of their personal data), 2. to obtain access to their personal data from the Company, i.e. to obtain confirmation from the Company as to whether the Company processes personal data concerning them and, if so, the data subject has the right to obtain access to such personal data and to other information to the extent permitted by law, 3. to make corrections to their incorrect personal data or to supplement incomplete personal data, 4. to have their personal data erased if the legal conditions have been met, e.g. if the personal data is no longer needed for the purposes for which it was obtained or otherwise processed, or if the subject withdraws their consent on the basis of which the personal data was processed, 5. to limit the processing of personal data by the Company if the legal conditions are met, 6. to data portability, i.e. to obtain their personal data they have provided to the Company in a structured, commonly used and machine-readable format, 7. to object at any time, on grounds relating to their particular situation, to the processing of personal data concerning them; 8. not to be the subject of automated individual decision making, including profiling, unless the subject gives their consent, except where automated processing is permitted by law; 9. to lodge a complaint with the oversight authority.

6.10. The Company is entitled to require from the subject of personal data, when they submit a request for the exercise of any of the above rights, their personal identification verified by a competent employee, or identification verified by other available methods (e.g. data box, notarial

verification/Czechpoint verification of signature at the subject's request, or in person at the Company's headquarters).

6.11. In cases defined by law, the Company is entitled to request a reasonable fee for the provision of information to the subject on their processed personal data, though not exceeding the costs necessary to provide the information.

## **7. Final provisions**

7.1. The data subject may obtain all information on the processing of their personal data in person or by email. The current contact details of the data protection officer can be found on our Company's website at <https://www.olomoucregioncard.cz/kontakt/>. The data subject may exercise their rights arising from the applicable legislation on the processing and protection of personal data by contacting the data protection officer at the email address [prodej-  
orc@centralaok.cz](mailto:prodej-orc@centralaok.cz).

7.2. The data subject has the right to contact the Office for Personal Data Protection located at Pplk. Sochora 27, 170 00, Prague 7, telephone switchboard +420 234 665 111, <https://www.uooi.cz>, in particular if the Company does not comply with a request for an explanation or rectification of a situation arising from the processing of personal data that is in violation of the applicable legal regulation in the area of the processing and protection of personal data.