

# INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA

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### 1) What is the purpose of this document?

The purpose of this document is to provide you with information about the terms under which your personal data will be processed.

This memorandum applies to you if you are

- an employee or former employees
- a job applicant or former job applicant
- a member of a body of the company or a former member of a body of the company
- an applicant for an internship, a former applicant for an internship, an intern or a former intern

one of the following companies forming part of EP Industries holding:

- **Andelta, a.s.**, ID No.: 247 19 951, based at Pařížská 130/26, Praha 1 – Josefov, postcode 110 00, registered in the Commercial Register lodged with the Municipal Court in Prague, Section B, File No. 16395

- **BAULIGA a.s.**, ID No.: 271 51 191, based at Pařížská 130/26, Praha 1 – Josefov, PSČ 110 00, registered in the Commercial Register lodged with the Municipal Court in Prague, Section B, File No. 9346
- **ED Holding a.s.**, ID No.: 283 64 457, based at Pařížská 130/26, Praha 1 – Josefov, PSČ 110 00, registered in the Commercial Register lodged with the Municipal Court in Prague, Section B, File No. 14128
- **Energetické montáže Holding, a.s.**, ID No.: 269 75 491, based at Pařížská 130/26, Praha 1 – Josefov, PSČ 110 00, registered in the Commercial Register lodged with the Municipal Court in Prague, Section B, File No. 10243
- **EP Industries, a.s.**, ID No.: 292 94 746, based at Pařížská 130/26, Praha 1 – Josefov, PSČ 110 00, registered in the Commercial Register lodged with the Municipal Court in Prague, Section B, File No. 21734
- **ZERTILIO a.s.**, ID No.: 291 46 232, based at Pařížská 130/26, Praha 1 – Josefov, PSČ 110 00, registered in the Commercial Register lodged with the Municipal Court in Prague, Section B, File No. 18828

Elsewhere in the text all the above companies are jointly referred to as “EPI”. If this memorandum uses the terms “us” or “the company”, those terms refer to all the above companies.

## 2) Who is responsible for processing my personal data?

The personal data controller responsible for the due processing of personal data, is the company of which you are an employee, former employee, a member of a body of the company or a former member of a body of the company, or to which you are applying or have applied for a job or for which you are performing or have performed an internship or work experience.

## 3) How can I contact the personal data controller?

The contact details for all the EPI companies are as follows:

- address: Pařížská 130/26, Praha 1 – Josefov, PSČ 110 00
- tel. +420 232 005 200
- e-mail: [info@epindustries.cz](mailto:info@epindustries.cz)
- web: <https://www.epindustries.cz/en/>.

In matters concerning the protection of your personal data you may contact the Chief Protection Officer, by sending an e-mail to [cpo@epindustries.cz](mailto:cpo@epindustries.cz).

Existing employees may also contact their HR manager.

## 4) What categories of personal data will be processed?

EPI processes the following categories of personal data:

## I. DETAILS OF JOB APPLICANTS AND APPLICANTS FOR INTERNSHIPS

- identification details: first name, surname, titles, date of birth, home address
- contact details: telephone number, e-mail address, correspondence address
- curriculum vitae and covering letter: details of your education, work experience, skills and motivation for working for EPI
- employment and/or study references: recommendations from previous employers (school), including data resulting from their verification
- data resulting from interviews: notes and findings from personal conversations or telephone calls with you
- other information which you voluntarily decide to share with EPI during the recruitment process, e.g. information about your hobbies, study results, photographs

## II. DETAILS OF EMPLOYEES

- identification details: first name, surname, maiden name, previous surname, titles, date of birth, place of birth, home address, marital status, nationality, identify card number
- contact details: telephone number, e-mail address, correspondence address
- details needed to process the payroll agenda and mandatory contributions: birth registration number, health insurance number (for foreign nationals), bank account number, bank code and bank name for wages to be sent to; first name, surname and birth registration number of your spouse/registered partner; first names, surnames and birth registration numbers of your children; information about whether you claim tax relief (including copies of your children's birth certificates and confirmation from your second husband that he does not claim tax relief, and confirmation of studies for adult children); information about whether you claim an invalidity pension (if so, what degree) or retirement pension or hold a ZTP/P disability card, including details of the claim; wage details; holiday details; travel/expenditure details; mobile telephone records, if you have been provided with one
- attendance records
- highest education level
- extracts from the criminal records
- details of training courses completed
- data collected by security systems: records from the camera system in the lift and in the corridors at the company's headquarters, entry records
- data relating to how you use IT equipment entrusted to you
- data for internal communication: photographs on the EPI intranet
- medical records: the results of compulsory occupational health checks

- details of persons closely related to you in accordance with the Market Abuse Regulation (applies only to managerial staff)

### III. DETAILS OF MEMBERS OF THE COMPANY'S BODIES

- identification details: first name, surname, titles, date of birth, place of birth, home address, nationality, identity card number
- contact details: telephone number, e-mail address, correspondence address
- details needed to pay performance bonuses: bank account number, bank code and bank name
- extracts from the criminal records
- affidavit confirming competence to serve as a member of the company's body
- data collected by security systems: records from the camera system in the lift and in the corridors at the company's headquarters, entry records
- data relating to how you use IT equipment entrusted to you
- data for internal communication and external communication: photographs on the EPI intranet and website
- details of persons closely related to you in accordance with the Market Abuse Regulation

### IV. DETAILS OF INTERNS

- identification details: first name, surname, titles, date of birth, home address
- contact details: telephone number, e-mail address, correspondence address
- data collected by security systems: records from the camera system in the lift and in the corridors at the company's headquarters, entry records
- data relating to how you use IT equipment entrusted to you

#### **5) On what legal basis is personal data processed?**

EPI processes personal data on the following legal basis

##### a) compliance with obligations arising from the law

EPI processes your personal data as obliged to do so under the Labour Code, the Commercial Code and other relevant laws (e.g. regulations on sickness and pension insurance, social security).

##### b) performance of contract

EPI processes your personal data for the exercising of the rights and fulfilment of obligations under your employment contract, performance contract for a body member, non-employment agreements and any other agreement concluded between you and EPI.

c) safeguarding the legitimate interests of the company

These are cases where personal data needs to be processed to protect the interests of the controller and also your interest in the protection of personal data does not outweigh our interest in the relevant processing. For example, in monitoring the company premises using the security cameras EPI does not require your consent to process such data, as it considers securing the company's premises to be its legitimate interest.

d) consent to the processing of personal data

EPI currently does not process personal data on the basis of consent, although it may do so if you grant your consent (e.g. for the purposes of filing your job application).

**6) For what purpose will personal data be processed?**

Your personal data will be processed for the following purposes

a) recruiting employees/interns for new or reopened vacancies, including positions in the company's bodies

- EPI processes your personal data to ensure that it has sufficient qualified employees and to assess the suitability of individual candidates for the position in question.
- Legal basis for processing: legitimate interest

b) preparation of employment contract, performance contracts, and any other contracts of a similar nature, changes to contract during the course of employment/performance of office

- EPI processes data essential for exercising its rights and obligations from the contract it has concluded with you.
- Legal basis for processing: performance of contract

c) payroll accounting, incl. mandatory contributions and synergies and travel expenses, accounting for performance bonuses, holiday leave records

- Legal basis for processing: compliance with obligations arising from the law, performance of contract

- Relevant laws: Labour Code, Income Tax Act, Health Insurance Act, Act on Premiums for Public Health Insurance, Social Security Act, Act on Sickness Insurance, Code of Civil Procedure

#### d) accounting and tax agenda, archiving documents

- Legal basis for processing: compliance with obligations arising from the law, legitimate interest
- Relevant laws: Accounting Act, Income Tax Act, Archives Act

#### e) protection of EPI assets

- The premises of the EPI headquarters are monitored by a camera system to protect personnel and property.
- Legal basis for processing: legitimate interest

#### f) records of entrusted items

- EPI also keeps records of company cars, mobile telephones, laptops, and any other work aids provided to you.
- Legal basis for processing: legitimate interest

#### g) IT security

- All EPI employees are assigned an e-mail address at the domain @epindustries.cz. These e-mail addresses are intended for work-related communication. Network traffic and connected devices are also monitored to cover security risks.
- Legal basis for processing: legitimate interest

#### h) administration of training and courses

- EPI supports the personal development and qualifications of its employees, including by enabling them to attend training and courses. In certain cases such training or courses are a legal requirement.
- Legal basis for processing: compliance with obligations arising from the law, legitimate interest
- Relevant laws: Labour Code, Fire Prevention Act

#### i) occupational health checks

- Occupational health checks within the scope and at the intervals stipulated by law are measures implemented to protect the health of employees.
- Legal basis for processing: compliance with obligations arising from the law
- Relevant regulations: Labour Code, Act on Specific Medical Services, Public Health Act

#### j) administration of business trips

- At the request of the employee/member of the company's body EPI will book air tickets, accommodation, etc.
- Legal basis for processing: legitimate interest

#### k) administration of employee benefits

- EPI offers its employees benefits in the form of tickets to cultural performances or meals vouchers
- Legal basis for processing: legitimate interest, performance of contract

#### l) entries in public registers, cooperation with financial market surveillance authorities

- EPI is obliged to publish details of the members of its bodies in the Commercial Register and file the relevant deeds in its collection of documents. Certain companies from the EPI group must also comply with the obligations arising from the Market Abuse Regulation – one of these obligations is to keep records of persons with managerial authority and persons closely associated with them.
- Legal basis for processing: compliance with obligations arising from the law
- Relevant laws: Business Corporations Act, Act on Public Registers, Market Abuse Regulation

#### m) litigation agenda: determination, enforcement or defence of our legal claims, including recovery of receivables

- Legal basis: performance of contract, legitimate interest

### **7) Where is my personal data stored?**

Your personal data is stored both in in electronic and physical (printed) form. Documents in electronic form are stored on the local disks of the workstations of employees, particularly those of the HR department (the disks are secured by encryption and the data is stored in the profile of user authenticated in the EPI computer domain) in the business part of the Microsoft Office 365 cloud (access restricted to HR staff authenticated through their user accounts) and in the Helios Green information system operated by an external HR service provider (access restricted to HR staff and contractual employees of the service provider). Documents in physical form are stored in lockable cabinets, with access restricted to authorised personnel only.

#### **8) Apart from EPI, who will have access to my personal data?**

We process and store the personal data you have provided to us within EPI (for internal administrative purposes, personal data may be transferred between group companies). If your personal data is processed on the basis of the legitimate interests and for the purposes specified above, your personal data may also be processed by external co-workers of EPI, its contractual partners and any other subsidiaries of EP Industries holding not listed under point 2 of this memorandum. We carefully select the subjects that work with us on the basis of guarantees covering the technical and organisational aspects of protecting the personal data we provide.

#### **9) Will my personal data be transferred outside the Czech Republic?**

The European Economic Area (“EEA”) applies a system ensuring the free movement of personal data and the processing of such data is subject to the same rules as in the Czech Republic. In certain cases our contractual partners may process personal data in third countries (i.e. countries outside the EEA), although always while ensuring compliance with all the legislative requirements. If personal data is processed in the USA, our partner there always meets the requirements and is registered with the Privacy Shield programme. For more about the Privacy Shield programme, visit: <https://www.privacyshield.gov/welcome>.

#### **10) How long will my personal data be stored by your company?**

We process your personal data fundamentally during the time you are employed/contracted by EPI. After you cease to be employed/contracted by EPI the only documents or personal data that are retained are those we have a legitimate interest in retaining (or to defend our interests in the event of a dispute), for 10 years after the end of your employment with EPI and/or those documents or personal data that we are obliged by law to store (i.e. in certain cases for up to 30 years).

In the event that you have unsuccessfully applied for a job with EPI and have not given us your consent to the processing of your personal data in the event that another vacancy might arise in the future that could interest you, your personal data is deleted as soon as the selection procedure for the position has ended.



We store camera recordings for 1 month after the recordings are taken.

In order to minimise data we always only process the personal data necessary for the given purpose and store it only for the necessary length of time. As soon as this time expires, personal data is deleted or anonymised.

### **11) What are my rights in connection with the processing of personal data?**

You have the right to request access to your data at any time - this means that at your request we will provide you with information about how we process your personal data, for what purpose, the sources from which the personal data was obtained, to whom your data has been provided and for how long we plan to store it.

You have the right to request that incorrect personal data be corrected and incomplete personal data be supplemented at any time. You also have the right to request the deletion of personal data no longer needed for the purpose for which it was originally collected, or which the controller is no longer entitled to use for other reasons (e.g. the data has been processed unlawfully, its deletion is required by law, etc.).

You have the right to request restrictions on the processing of your personal data – this means that you may ask us not to delete your data what we would otherwise be obliged to delete, and you may also request that we cease to work with your personal data until it becomes apparent that the data processed is precise, or whether any objection to the processing of personal data you have filed is justifiable (see the right to file an objection below).

You have the right to the portability of your personal data – this means that you may request that we provide you with the personal data we process in electronic form to enable it to easily be transferred to another controller (service provider), or to enable us to transfer it directly to another controller. This right applies only to personal data we have obtained in electronic form, on the basis of your consent or on a contractual basis.

**At any time you have the right file an objection against the processing of your data for direct marketing purposes** (sending commercial offers). If you do so, your personal data will no longer be used for that purpose. **You also have the right to file an objection against the processing of your personal data based on our legitimate interest** – in such a case we will only continue to process your data if there are proven and serious justified grounds for doing so.

**If your personal data has been processed on the basis of your consent, you have the right to revoke that consent at any time.** Your personal data will then immediately cease to be processed.

### **12) How can I exercise my rights?**

You may exercise your right (including the right to file an objection) with the personal data controller (see point 2 of this memorandum). You may contact us in writing, by telephone or by e-mail (the contact details are given in point 3 of this memorandum). To enable your case to be processed better and faster, we ask you to use the form which can be found on our website at <http://www.epholding.cz>.

**13) What should I do if I suspect that my personal data has been processed in violation of the law, or the General Data Protection Regulation?**

In such a case you have the right file a complaint with the Office for Personal Data Protection, Pplk. Sochora 27, 170 00 Praha 7, tel. +420 234 665 111, e-mail: [posta@uouu.cz](mailto:posta@uouu.cz), website: <https://www.uouu.cz>.

**14) Does the processing of my personal data involve automated decision-making, including profiling?**

Automated decision-making means decisions made by a machine (computer) without human intervention, and which has the same legal or other such binding consequences for you (e.g. refusing to conclude a contract or withdrawing from a contract). Your personal data is not processing in this manner at EPI; the relevant decisions are always made by a specific employee of the company.

**LIST OF LEGISLATION**

General Data Protection Regulation	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
Market Abuse Regulation	Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (Market Abuse Regulation) and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC
Code of Civil Procedure	Act No. 99/1963 Coll., Code of Civil Procedure, as amended
Labour Code	Act No. 262/2006 Coll., Labour Code, as amended
Income Tax Act	Act No. 586/1992 Coll., on income tax, as amended

Act on Sickness Insurance	Act No. 187/2006 Coll., on sickness insurance, as amended
Act on Premiums for Public Health Insurance	Act No. 592/1992 Coll., on premiums for public health insurance, as amended
Social Security Act	Act No. 589/1992 Coll., on social security premiums and the contribution to the state employment policy, as amended
Accounting Act	Act No. 563/1991 Coll., on accounting, as amended
Health Insurance Act	Act No. 48/1997 Coll., on public health insurance, as amended
Act on Specific Medical Services	Act No. 373/2011 Coll., on specific medical services, as amended
Public Health Act	Act No. 258/2000 Coll., on the protection of public health and on amendments to certain related acts, as amended
Fire Prevention Act	Czech National Council Act No. 133/1985 Coll., on fire prevention, as amended
Archives Act	Act No. 499/2004 Coll., on archives and the records service, as amended
Business Corporations Act	Act No. 90/2012 Coll., on business corporations, as amended
Act on Public Registers	Act No. 304/2013 Coll., on public registers of legal entities and natural persons