

## Information about the personal data processing of contractual partners of VR Group, a.s.

This document was created by **VR Group, a.s.**,

with its registered office at Tiskařská 270/8, Malešice, 108 00 Prague 10, company registration number 25699091, registered in the Commercial Register administered by the Metropolitan Court in Prague, section B, file 5580, in compliance with valid regulations, especially in accordance with Regulation (EU) 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 (hereinafter GDPR).

This document sums up the basic principles on how VR Group, a.s. treats and processes the personal data of current and potential contractual partners as well as natural persons. This document also contains general information on the personal data processing of companies cooperating with VR Group, a.s., as well as more detailed information about the personal data processing of current or potential contractual partners and natural persons of VR Group, a.s., which are processed in compliance with the aforementioned Regulation and other related laws and regulations.

VR Group, a.s. is a part of the state enterprise LOM PRAHA, s.p., company registration number 00000515, with its registered office at Tiskařská 270/8, Malešice, 108 00 Prague 10 (hereinafter “LOM PRAHA”).

VR Group, a.s. (hereinafter also referred to as the “**company**”) is a controller of the personal data of current and potential contractual partners and natural persons. Consequently, the company processes their personal data, defines the purpose and means of their processing, and bears responsibility for the processing.

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#### I. Basic terminology

Based on valid laws and regulations

- **‘personal data’** means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **‘a special category of personal data’** also called ‘sensitive data’ (based on the provision of Article 4 of the Personal data protection Act 101 of 2000, as amended) are data which reveal information on racial or ethnic origin, political opinions, religion or philosophical beliefs, trade union membership. This category also covers the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation;
- **‘sensitive data’** are personal data which could cause damage or raise concrete fears to the subject if made accessible. Examples of these data are special categories of personal data (as defined above), credit card numbers and other information of a financial nature concerning the subject, personal identification numbers and localization data;
- **‘controller’** means a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by the Union or Member State law, the controller or specific criteria for his/her nomination may be provided for by Union or Member State law;

- **‘data subject’** is an identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **‘processor’** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- **‘recipient’** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
- **‘consent’** of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- **‘personal data breach’** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- **‘processing’** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

## II. Who is the controller of your personal data?

The controller of personal data is VR Group, a.s. with its registered office at Tiskařská 270/8, Malešice, 108 00 Prague 10, company registration number 25699091, tax identification number CZ25699091. The company is registered in the Commercial Register administered by the Metropolitan Court in Prague, section B, file 5580 (hereinafter also referred to as the “controller”), and in compliance with the provisions of the Article 12 of GDPR, informs you about the processing of your personal data and your rights.

## III. What are the principles of personal data processing?

When processing personal data, VR Group, a.s. respects all rights of data subjects with a focus on these principles:

- There must be legal grounds for processing your personal data.
- Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.
- Personal data shall be collected and processed for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Personal data processed by the company shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Personal data shall be processed in a manner that ensures their appropriate security, using reasonable and available measures.
- The company shall only process data which are accurate and, where necessary, kept up to date. Inaccurate or redundant data shall be erased or rectified.
- Personal data shall be stored for the period necessary for the purpose for which they have been collected.
- The processing of your personal data shall be carried out in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

## IV. Where does VR Group, a.s. obtain your personal data?

- From you, e.g.
  - At your request and during negotiations on the conclusion of a contract
  - During telephone communication
  - During face-to-face or written communication with you, including electronic communication (e-mail).
- From third parties, e.g.
  - State administration bodies or third parties when fulfilling legal obligations or based on special laws and regulations
  - Cooperating third parties.
- From publicly available sources, such as:
  - Social networks and the internet, provided that you make the data public
  - Business register and ARES application

- Insolvency register
- Land register
- Trade register
- Public phone book

## V. What personal data does VR Group, a.s. process?

The personal data of contractual partners and natural persons, which are processed by VR Group, a.s., are in particular data provided by the contractual partners themselves (by potential partners too), e.g. name and surname, address, business address, company registration number, tax identification number, account number, contact details such as an e-mail address and telephone number, date of birth, information stated in contracts, amounts invoiced and outstanding, etc. VR Group, a.s. might process the personal data of potential contractual partners and entrepreneurs, which can be obtained from public sources (e.g. websites).

VR Group, a.s. processes the following personal data:

- Addresses and identification data serving for the unambiguous and unchangeable identification of a data subject (e.g. name, surname, title, date of birth or national identification number, permanent address, company registration number, tax identification number)
- Descriptive data (e.g. bank details)
- Contact details (telephone number, mobile phone number, fax, e-mail, data box ID)
- Other electronic data (e.g. IP address)
- Other data necessary for contract settlement (invoiced amounts, etc.)

In terms of the personal data processing of current or potential contractual partners, VR Group, a.s. also processes data about members of statutory bodies or any contact persons who act on behalf of that partner (especially their name and surname, contact details such as an e-mail address and telephone number, position, alternatively minutes of past meetings). These data are processed for the same purpose, to a similar extent and for a similar time period as the information about contractual partners. Individual employees of VR Group, a.s. may keep their own records of some data, e.g. telephone directories and business card catalogues.

## VI. What are the legal grounds for processing your personal data with VR Group, a.s.?

The processing of the personal data of contractual partners and natural persons, by VR Group, a.s. is lawful only if and to the extent that at least one of the following conditions applies:

- The data subject gave consent to the processing of his or her personal data for one or more specific purposes.
- Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- Processing is necessary for compliance with a legal obligation to which VR Group, a.s. is subject.
- Processing is necessary in order to protect the vital interests of VR Group, a.s., yours or of another natural person.
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in VR Group, a.s.
- Processing is necessary for the purposes of the legitimate interests pursued by VR Group, a.s. or by a third party, except where such interests are overridden by your interests or your fundamental rights and freedoms which require the protection of personal data.

## VII. What is the purpose of processing your personal data by VR Group, a.s.?

The main purpose of processing the personal data of a contractual partner (and of a potential contractual partner) is that their processing is necessary for concluding a contract and its subsequent fulfilling. In this context, personal data shall be processed and used to implement the measures taken before the contract is concluded at your request as well as the subsequent proper fulfilment of the rights and obligations arising from the contract (e.g. the fulfilment of obligations arising from tax and accounting regulations), for record-keeping and statistical purposes, alternatively for the debt collection (recovery of receivables) and protection of rights of VR Group, a.s. and of third parties (e.g. other contractual partners), especially against illegal activity. The data (especially obtained from communication with a partner, such as an IP address and time of the communication) will also be used in order to ensure the IT security of the company.

## VIII. How long will VR Group, a.s. keep your personal data?

VR Group, a.s. shall process the personal data of contractual partners for the entire duration of the contractual relationship and until the realization of all obligations resulting from or related to the given contractual relationship and after the contract termination, for the period necessary to protect their legitimate interests (e.g. contracts shall be kept in records for 10 years after their termination). In case that the time of processing is determined by regulations, personal data will be processed for such a time if the reasons stated further do not justify a longer period of processing. When deciding the adequacy of the period of personal data processing, these aspects will be taken into account:

- Length of limitation period
- Probability of legal claims

In cases where the personal data processing is done based on the consent of a data subject, his or her personal data are processed for the period granted by the consent.

## IX. How are your personal data processed and protected?

Personal data processing is carried out by the authorized employees of VR Group, a.s., alternatively by a processor or his/her employees, all to the extent necessary for the performance of their job for our company. Your personal data are processed with IT technologies, or manually when processing personal data in paper form, in compliance with all security principles for personal data administration and processing. For this purpose, the company took technical and organizational measures in order to ensure the protection of your personal data, especially measures which prevent unauthorized people from accessing your personal data, their change, destruction or loss, unauthorized transfers, unauthorized processing and other types of misuse of personal data. All subjects who might have access to your personal data respect the right to the privacy of data subjects and they have the obligation to follow valid regulations on personal data protection.

### Transfers of personal data to other persons (recipient of personal data)

Some personal data are processed by third parties – our contractual partners, i.e. the processors of personal data. VR Group, a.s. strive to choose only trustworthy processors.

As far as providing your personal data to third parties is concerned (e.g. suppliers of external services or persons who form a group with VR Group, a.s.), VR Group, a.s. can only provide your personal data to the usual extent and only in cases when it is enforceable or enabled by a legal obligation, or with your consent. Your personal data can be made accessible to the strictly necessary extent to legal and tax advisors, and auditors. Your personal data can be handed over to the state administration when requested or on suspicion of infringement.

### Transfer of personal data abroad

Typically, VR Group, a.s. does not transfer personal data outside of the EU. However, it can happen that your personal data will be processed in a computer system whose servers are located outside of the EU. With regard to the systems typically used in business, it could be systems using servers located in the United States. In such a case, our company will try to ensure the best data protection possible (VR Group, a.s. shall only choose for a contractual partner a company which complies with the standards of the European Commission for the safe exchange of data between the EU and the USA, the so-called Privacy Shield). If VR Group, a.s. transfers your personal data to non-EU countries, you will be informed in advanced, if necessary.

## X. Rights of the data subject

As a data subject you have the following rights:

- **The right to the access to your personal data** and making a copy of personal data, which we process about you.
- **The right to rectification**  
VR Group, a.s. strives to ensure accuracy and timeliness when processing your personal data. The data subject shall have the right to obtain the rectification of inaccurate personal data concerning him or her from the controller without undue delay. Taking into consideration the purposes of the processing, data subjects shall have the right to have incomplete personal data completed.
- **The right to erasure**  
The data subject shall have the right to request that VR Group, a.s. erase personal data concerning him or her without undue delay. VR Group, a.s. shall erase these data if:
  - The personal data are no longer necessary for the purposes for which they were collected or processed
  - The data subject withdrew consent authorizing the company to process his/her personal data and there is no other legal ground for their processing
  - The data subject raises objections against data processing and there are no overriding legitimate grounds for the processing
  - The data subject objects to the processing
  - The personal data have been unlawfully processed.
- **The right to the restriction of processing**  
The data subject shall have the right to request that VR Group, a.s. restrict the processing of personal data if certain conditions to restrict the processing of personal data, based on law and regulations, are met.
- **The right to data portability**  
The data subject shall have the right to request from VR Group, a.s. to obtain the personal data concerning him or her and which he/she had provided, and give the data to another controller, if certain conditions based on laws and regulations, are met.

- **The right to object**

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to the processing of personal data concerning him or her. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

- **The right not to be subject to automated individual decision-making, including profiling**

VR Group, a.s. as a controller does not use the automated processing of personal data.

- **The right to file a complaint**

The data subject shall have the right to file a complaint against the processing of personal data with the supervising authority which is the Office for personal data protection with its registered office at Pplk. Sochora 27, 170 00 Praha 7.

- **The right to withdraw consent**

The data subject has the right to withdraw his or her consent at any time, either in writing to the office address of VR Group, a.s., or to the e-mail address stated in Article XIII. The withdrawal of consent does not have a retroactive effect.

The requests processed in accordance with this article must be submitted in writing including your signature, your name, address and if possible, e-mail address too. Requests must be sent to the address stated at the end of this document. VR Group, a.s. shall process your requests properly and without undue delay. Requests for the erasure of personal data shall be considered with regard to appropriate legal requirements. In cases where the applicable law sets a charge for handling such a request, VR Group, a.s. may charge this fee. If we receive such a request but there are considerable doubts concerning the identity of the applicant, we may request the provision of additional information necessary to confirm the identity of the data subject.

## **XI. Who can you contact if needed?**

In order to update your personal data or to exercise your right to information or access your personal data, it is possible to contact VR Group, a.s. at the following address:

**VR Group, a.s.**

Tiskařská 270/8

108 00 Praha 10 – Malešice

e-mail: [gdpr@vrg.cz](mailto:gdpr@vrg.cz)

This document can be continuously updated or modified. For this reason, it will contain the date of the last revision. Changes and amendments to this document come into force and come into effect on the day when they become public. Please read this document from time to time in order to find out whether any changes were made to it.

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