

Information on personal data processing

Data controller, extent, purpose, and time of personal data processing

1. Česká pošta, s.p. (hereinafter referred to as “the Company”), as a provider of postal services or partial additional services included in the postal terms and conditions, acts in the capacity of a personal data controller in the meaning of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the General Regulation on Personal Data Protection, hereinafter referred to as “the Regulation”).
2. The personal data of the sender and the addressee, who are natural persons, are subject to personal data protection in accordance with the applicable legislation, in particular the Regulation.
3. The Company processes personal data to the extent that they have been provided to the Company for the purposes of providing a postal service or partial additional service specified in the postal terms and conditions. The extent of personal data includes: name, surname, address, possibly also email address and contact telephone number and other personal information, if necessary to provide the service.
4. As a rule, the personal data included in the addressee’s or sender’s postal address are processed by the Company for the purpose of delivery or return of a consignment or remitted money order.
5. As a rule, the personal data contained in the Remittance of COD Amount form or in a data file are processed by the Company for the purpose of collection and delivery of the collected COD amount.
6. The legal basis for personal data processing is the postal contract concluded between the Company and the person providing the personal data to the Company (hereinafter referred to as “the Data Provider”). In partial cases, the legal basis for personal data processing is their necessity for the purposes of the legitimate interests of the Company, the sender, or the addressee (e.g. for complaint purposes).
7. If the Provider also provides the Company with the email address or telephone number of the sender or recipient, these personal data may be processed by the Company for the purpose of contacting in relation to the submission, delivery, or storage of postal consignments (via telephone or email/text notification) based on the legal basis of contract fulfilment; and also for the following legitimate interests of the Company:
 - a) Questioning about the quality of provided services; and
 - b) Company’s direct marketing.
8. Each person concerned has the right to file a complaint against the personal data processing for the purpose of Czech Post’s legitimate interests.
9. The Data Provider is entitled to provide the Company only with the personal data in respect of which it is in the position of a personal data controller within the meaning of the relevant provisions of the Regulation.
10. The provision of personal data is voluntary, but unless it is provided, the Company cannot provide the postal service or the requested additional service for which the provision of personal data is required in the postal terms and conditions.
11. The Company is entitled to store personal data provided to the Company under the postal contract for the purpose of protecting the rights and legitimate interests of the controller or third party. The Company may store personal data for as long as the Company or a third party is entitled to exercise any rights related to the provided postal service or selected additional service.

Transfer of personal data to third parties

12. All personal data provided to the Company on the basis of the postal terms and conditions is protected as postal secrecy within the meaning of Section 16 of the Act No. 29/2000 Coll., on postal services and on amendment to certain related acts (hereinafter referred to as “the Postal Services Act”); as such, it is subject to the statutory obligation of the Company to maintain its confidentiality. The Company is entitled to transfer the personal data

only under the conditions stipulated by law exclusively to persons authorised under Section 16 of the Postal Services Act and/or to the entities and bodies authorised to access such data under special legislation.

13. Pursuant to Section 16 of the Postal Services Act, the Company may disclose the personal data provided to it under the postal terms and conditions to third parties involved in the provision of the Company's services, i.e. in particular for the transportation, pickup, handling, delivery, or depositing of a payment document and delivery of a money order amount. These persons may process the relevant personal data only on the basis of the Company's instruction, unless the duty to process the personal data is imposed on them by law. The Company is obliged to take measures to satisfy this requirement as well as to ensure that the persons authorised to process the personal data undertake to maintain confidentiality if they do not have the legal obligation of confidentiality.
14. The Company will be held liable for any personal data processors used by the Company in accordance with the postal terms and conditions for the processing of personal data provided by the Company under the postal terms and conditions. If the Company uses contractual processors to provide its services, the processors are listed in the List of Processors that is available at www.ceskaposta.cz (in the section Personal Data Protection – GDPR).

Fulfilment of the information duty and exercise of the rights of a data subject.

15. The Company and the Data Provider (as data controllers) must perform the information duty and allow Data Subjects to exercise their rights under the Regulation in accordance with the specific purpose of processing in relation to those Data Subjects whose personal data have been provided to the Company under the postal terms and conditions for the purpose of providing a postal service or a partial additional service specified in the postal terms and conditions ("Data Subject"). These activities will be arranged for by the Company in relation to the services provided by the Company and by the Data Provider in relation to the activities performed by the Data Provider, which, as a rule, precede the conclusion of the postal contract. Both

the Company and the Data Provider are obliged to provide all necessary due assistance when processing the response to the Data Subject's request.

16. The Data Subject has, under certain conditions laid down by the Regulation, the right to access, rectify or erase his or her personal data, or to limit their processing; the right to object to the processing, and the right to data portability. Information on how the Data Subject can exercise these rights and other important information, in particular data concerning the Data Protection Officer and the Complaints Supervisory Authority, can be found on the website www.ceskaposta.cz (in the section "Personal Data Protection – GDPR") and also, if requested, at any post office where the application for exercise of the rights of a data subject according to the Regulation can be filed.

Personal data security guarantees.

17. Personal data provided to the Company on the basis of the postal terms and conditions may be processed in electronic or paper form.
18. Taking into account the state of the art, the cost of execution, the nature, the extent, the context, and the purposes of the processing of personal data provided by the Company under the postal terms and conditions for the provision of postal services or partial additional services, as well as the variously probable and differently serious risks to the rights and freedoms of Data Subjects, both the Company and the Data Provider are obliged to take appropriate technical and organisational measures to ensure a level of security appropriate to the risk, in particular to take all measures necessary to prevent unauthorised or accidental access to, alteration, destruction, loss, abuse or any other unauthorised processing of personal data.
19. The Company has adopted these measures to safeguard personal data processed when providing postal services or partial additional services according to the postal terms and conditions:
 - a) Measures to ensure the security of personal data processing in both manual and automated processing;
 - b) Systems for automated processing of personal data and non-automated processes for processing personal data are managed only by authorised persons;

- c) Individuals authorised to use automated personal data processing systems only have access to personal data that correspond to the level of authorisation of those individuals, subject to specific user authorisations established solely for those persons;
- d) Records are taken to identify and verify when, by whom, and for what reason personal data has been recorded or otherwise processed;
- e) Unauthorised access to data carriers carrying personal data is prevented;
- f) Procedures for the protection of personal data are in place;
- g) Procedures to reveal any violation of personal data (such as data loss or modification) are in place;
- h) Integrity and availability of information are ensured;
- i) Personal data processing contracts with external entities have been concluded;
- j) The Company regularly monitors and controls personal data processing processes;
- k) The Company regularly trains employees in security and personal data protection;
- l) The Company has taken measures to ensure protection against malicious software;
- m) The Company maintains a system of reporting, alerting, and investigating emergencies and security breaches;
- n) Personal data is treated as confidential.

Third-party obligations in transferring personal data to the Company

- 20. By posting a consignment, i.e. by transferring the personal data of a Data Subject in relation to the requested postal service or an additional service in accordance with the postal terms and conditions, the Data Provider agrees that the personal data provided by the Data Provider have been processed in accordance with the Regulation, are accurate, and comply with the extent necessary to fulfil the specified purpose, so that the Company can use them to provide the requested postal or additional service in accordance with the Regulation. By posting the consignment, i.e. by transferring the personal data of the Data Subject, the Data Provider agrees, at the request of the Company, to prove to the Company or the competent supervisory authority the Data Provider's authorisation to provide such personal data to the Company for the purpose specified in the postal terms and conditions.
- 21. If the Data Provider fails to fulfil the obligation specified in the previous paragraph, the Data Provider agrees, in accordance with section 2890 *et seq.* of the Act No. 89/2012 Coll., the Civil Code, to compensate the Company for any harm that the Company will consequently incur.

Further information about personal data processing

- 22. Any further information related to the processing of personal data is contained in the postal terms and conditions for the relevant postal service or partial additional service.