

PERSONAL DATA PROTECTION POLICY - GDPR

1 Introduction

This Personal Data Protection Policy describes how **Česká pošta, s.p., Odštěpný závod Balíkové služby (Balíkovna)** (hereinafter referred to as "the controller" or "Balíkovna") processes the personal data of natural persons in accordance with **Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR)** and related legislation.

The purpose of this document is to inform data subjects in particular about:

- what personal data are processed,
- for what purpose and on what legal basis the personal data are processed,
- how long the data are retained,
- what rights the data subjects have,
- how the personal data are protected.

This Policy applies in particular to:

- customers and users of services,
- Senders and Addressees of parcels,
- visitors to the [Balíkovna website](#) and users of the [Balíkovna mobile application](#), customers of customer service and contact centre,
- subcontractors of the controller.
- job applicants.

2 General information about personal data processing

2.1 Data controller

The data controller is:

Česká pošta, s.p.,

Business registration number: 471 14 983,

Registered office: Politických vězňů 909/4, 225 99 Prague 1, Czech Republic,

A company registered in the Commercial Register maintained by the Municipal Court in Prague, Section A, File 7565.

2.2 Data protection officer

The data controller has appointed a Data Protection Officer (DPO). The Data Protection Officer may be contacted regarding all matters related to the processing of personal data.

Contact details of the Data Protection Officer:

Mgr. Jitka Pišl Drábková, Prague 1, Politických vězňů 909/4, postcode: 22599,

email address: gdp@cpost.cz

2.3 Categories of processed personal data

The data controller is entitled to process in particular the following categories of personal data:

Identification details

- name and surname
- title
- identification details of entrepreneurs (business registration number, taxpayer registration number),
- user name and password
- application or social media IDs
- identity document number

Contact details

- delivery address
- mobile phone number or landline phone number (hereinafter referred to as "the phone number")
- email address

Parcel-related data

- Sender's and Addressee's data
- parcel posting number
- place of posting and delivery
- cash on delivery-related data

Data required for the functioning of the application and data on user behaviour in the application

- information on logging into the application
- information on payments
- system data on interaction
- data obtained from cookies and similar technologies for device identification, subject to the user's prior explicit consent

Payment-related data

- information on the completed payment
- account number in the event of a payment refund

Data related to the use of the data controller's call centre or branch

- records of communication with customer support
- email communication
- recordings from camera systems at branches

Data on job applicants

- curriculum vitae
- qualification data
- professional experience

3 Further information about personal data processing

When processing personal data, the data controller follows the principle of lawfulness and therefore processes personal data to an appropriate extent and only where at least one of the following conditions (legal bases) is met:

- The processing is necessary for the performance of a contract to which the data subject is a party, or for taking steps at the request of the data subject prior to entering into a contract

- The processing is necessary for compliance with a legal obligation to which the data controller is subject
- The processing is necessary for the protection of the vital interests of the data subject or another natural person
- The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller
- The processing is necessary for the purposes of the legitimate interests pursued by the data controller or a third party
- The processing is carried out on the basis of the data subject's explicit consent.

3.1 Purposes and legal bases of processing

The purposes of personal data processing, as well as information on the legal bases including the legitimate interests of the data controller or a third party, or information on whether certain processing of personal data can be carried out only on the basis of the client's freely given and active consent, are always specified in the contract concluded between the data controller and the client, or in the terms and conditions supplementing that contract (e.g. the General Terms and Conditions for the Provision of Services published on the [Balíkovna website](#), hereinafter referred to as "the GTCPSs").

As part of the contract concluded between the data controller and the client, personal data are also processed for the purpose of fulfilling the data controller's obligations arising from legal regulations (tax legislation and, where applicable, other public-law regulations). The data controller also processes personal data on the basis of its legitimate interests. The data controller's legitimate interests include in particular:

- prevention of fraud, protection of property and the reputation of the company;
- maintaining records of the data controller's clients who have been contacted by the data controller's sales representatives for the purpose of offering the conclusion of a contract with the data controller. The data controller also keeps records of clients concluding contracts via online applications. For record-keeping purposes, the data controller records only the basic identification details of clients;
- the establishment, exercise or defence of legal claims (e.g. claims procedures, conclusion of an instalment plan, resolution of a court dispute, etc.);
- improving the quality of the services provided (in this context, the data controller, for example, processes personal data from email communication conducted with clients. The storage period for personal data is up to 3 years.);
- ensuring security;
- direct marketing (that is, the processing of personal data of the data controller's existing clients for the purpose of contacting them directly with a commercial offer, the data controller's research or another commercial communication. If a client raises an objection to direct marketing in relation to a specific service, the data controller will immediately stop processing his personal data for this purpose and sending commercial offers for that service);
- checking the established technological processes, protection of property and persons due to security risks when handling financial means, detecting and preventing the commission of criminal activity and checks carried out as part of claims procedures (in this context, the data controller processes image recordings from the camera system located in the data controller's buildings and premises).

In all cases where the data controller processes personal data on the basis of an expressed legitimate interest, the client has the right to object to such processing. After an objection is raised, the data controller will assess whether the client has rights and freedoms that would outweigh the compelling legitimate grounds for the processing of personal data. If the assessment is positive, the data controller will uphold the client's objection.

All personal data processed by the data controller are duly secured using appropriate organisational and technical measures.

3.2 Retention period for personal data

Personal data are retained only for the period necessary to fulfil the purpose of their processing. The retention period for personal data, or the criteria for determining it, are always specified in the contract concluded between the data controller and the client. For record-keeping purposes, a retention period of one year from the moment of negotiations on the contractual relationship (data on a prospective client) is set, or a period of ten years, which starts running from the moment the contract with the client ceases to be effective. In accordance with generally applicable legal regulations, clients' personal data are retained under the Act on Archives and Records Management. If the data controller stores data on a client, it also records all other information that the client provides to it about natural persons with whom the client cooperates or whose data are necessary for the performance of the contractual relationship. The client is obliged to inform these persons in a similar manner about the transfer of their personal data to the data controller.

Typical retention periods:

Purpose	Retention period
Provision of postal services	for the duration of the contractual relationship
Claims	for the duration of the claims procedure
Accounting documents	in accordance with statutory periods (typically 10 years)
Customer communication	for the period necessary to deal with the enquiry
Recruitment	usually 6 months

3.3 Recipients of personal data

The recipient is the natural person or legal entity to whom the personal data are provided by the data controller. Public authorities that may obtain personal data in the course of a special investigation in accordance with special legal regulations are not regarded as recipients; the processing of such personal data by these public authorities must comply with the applicable personal data protection rules for the given purposes of processing.

The data controller transfers the customer's personal data only to those recipients who are listed in the contract concluded between the data controller and the customer (or on the website referenced in the contract), and therefore the transfer of such data is necessary for the purposes of performing the contract. A recipient is in particular considered to be a personal data processor who processes personal data for the data controller under the concluded contract. If the data controller entrusts the processing of personal data to contractual processors, these processors are listed in the [list of processors](#).

3.4 Transfer of personal data to third countries

Personal data may be transferred abroad only when the customer posts a parcel addressed to a foreign country. In such a case, the transfer of personal data abroad is necessary for the fulfilment of the postal contract between the customer and the data controller. Personal data in the scope of name, surname and address are also transferred to authorised foreign postal operators and customs authorities for the purposes of customs procedures in the country designated by the customer, in order to improve and facilitate operational and national security and the enforceability of rights in accordance with national legislation and the rules of the International Post Corporation.

For transfers of personal data to third countries, an adequate level of personal data protection under the GDPR is ensured.

3.5 Personal data processing in relation to the provision of postal services

When providing postal services or partial additional services listed in the [GTCPSs](#), the data controller manages personal data within the meaning of the GDPR and applicable legal regulations.

The data controller processes personal data to the extent of the personal data of the Sender and the Addressee that have been provided to it for the purposes of providing the postal service or the partial additional service listed in the [GTCPSs](#).

The data controller usually processes the personal data stated in the postal address of the Addressee or the Sender for the purpose of delivering or returning the parcel.

As a rule, the personal data contained in the Remittance of COD Amount form or in a data file are processed by the data controller for the purpose of collection and delivery of the collected cash-on-delivery amount.

The legal basis for the processing of personal data is the postal contract concluded between the data controller and the person who provides such personal data to the data controller. In partial cases, the legal basis for the processing of personal data is their necessity for the purposes of the legitimate interests of the data controller, the Sender or the Addressee (e.g. for claims purposes).

If the data subject also provides the data controller with the email address or telephone number of the Sender or the Addressee, such personal data may also be processed by the data controller for the purpose of contacting them in connection with the posting, delivery or holding of the parcel (by phone or by email/SMS notification) on the basis of the legal basis of performance of the contract; and further for the purposes of these legitimate interests of the data controller:

- enquiring about the quality of provided services
- the data controller's direct marketing.

Each person concerned has the right to file a complaint against the personal data processing for the purpose of the data controller's legitimate interests.

The data provider is entitled to provide the data controller 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 applicable laws.

The provision of personal data is voluntary, but unless it is provided, the data controller cannot provide the postal service or the selected additional service for which the provision of personal data is required in the [GTCPSs](#).

The data controller is entitled to store personal data provided to the data controller under the postal contract for the purpose of protecting the rights and legitimate interests of the data controller or third party. The data controller may store personal data for as long as the data controller or a third party is entitled to exercise any rights related to the provided postal service or selected additional service.

All personal data provided to the data controller on the basis of the [GTCPSs](#) are 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, they are subject to the statutory obligation of the data controller to maintain their confidentiality. The data controller 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.

Pursuant to Section 16 of the Postal Services Act, the data controller may disclose the personal data provided to it under the [GTCPSs](#) to third parties involved in the provision of the data controller's services, that is in particular for the transportation, pickup, handling, delivery, or depositing of a payment document and delivery of a transferred payment. These persons may process the relevant personal data only on the basis of the data controller's instruction, unless the duty to process the personal data is imposed on them by law. The data controller 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.

The data controller is responsible for any personal data processors used by the data controller in accordance with postal terms and conditions for the processing of personal data provided by the data controller under the [GTCPSs](#). If the data controller entrusts the processing of personal data to contractual processors, these processors are listed in the [list of processors](#).

3.6 Processing of personal data for the purpose of providing the unified registration and login service for end users

The data controller keeps a register of users of the service. For the purpose of duly providing the unified registration service (for example, for the proper functioning of the [Balíkovna mobile application](#) – see section 3.7), the data controller manages the personal data of users:

- which are processed about the user and kept in the user register, namely for the purposes of maintaining the user register and for the purposes of providing selected services of the data controller. The scope of personal data is set out in Article 3 of the Rules for Providing the Unified Registration and Login Service for End Users (hereinafter referred to as "the Rules"), which are available [here](#), and for each user the specific scope of processed personal data is visible directly in the service interface. The purposes of processing personal data, including relevant legal grounds, are outlined in Annex No. 1 to these Rules,
- which are processed in the provision of the service, in the scope of and in accordance with the Rules, by the data controller and, if applicable, also by personal data processors with whom the data controller has entered into a contract.

The user is responsible for the accuracy of all data provided to the data controller.

The data controller is authorised to record and retain logs of the user's use of the service, including the user's personal data, for no longer than the period during which the user account is maintained under the Rules.

The data controller enables the user to access the personal data kept in the user register. The user may, directly in the service interface, lodge an objection to the processing of personal data based on the legitimate interest of the data controller and also indicate the granting or withdrawal of consent to the processing of personal data within the meaning of the GDPR, if such types of personal data processing are applied within the service.

3.7 Balíkovna mobile application

By creating a user account in the [Balíkovna mobile application](#) (hereinafter referred to as "the application"), a legal relationship is established between the user of the application and the data controller. On this basis, the data controller will process the personal data of users to the extent necessary so that all user functions of the application can be offered to users of the application. The personal data that the user provides to the data controller for the proper functioning of the application when creating a user account are recorded in the user register of the service referred to in section 3.6 and under the rules, which are available [here](#).

The personal data of users of the application are processed and managed for the duration of the existence of the user account. Each user of the application is authorised to manage his personal data directly in the application.

The user of the application may grant the data controller consent to use personal data for marketing purposes. In such a case, advertising or marketing messages, including targeted advertising, may be displayed to the user in the application. Each user of the application has the right to withdraw his consent at any time. The data controller processes the personal data under this provision only for the period during which consent is granted by the user of the application.

The data controller is authorised to process the personal data of users also in connection with direct marketing of similar and related services or for obtaining feedback for the purpose of improving the operation of the application or the service provided. The data controller may therefore send users information about similar services or products offered by the data controller. Each user of the application has the right to raise an objection to such processing, on the basis of which the further processing of the personal data of the user of the application will be restricted or completely stopped.

3.8 Balíkovna website

Cookies

The [Balíkovna website](#) uses cookies, which are necessary for its proper functioning. Detailed information about cookies, their full list and the options for their settings can be found in a separate section dedicated to cookies on the [Balíkovna website](#).

The user may withdraw his consent to the use of cookies at any time by disabling this function in his browser.

My Balíkovna

For more convenient use of the website, the customer may log in to the My Balíkovna service. Information on the processing of personal data when logging in to this service can be found [here](#).

Web forms

The following forms are available on the Balíkovna website:

<https://www.balikovna.cz/en/stan-se-balikovnou>

<https://www.balikovna.cz/en/chci-posilat-baliky>

[Contract Customer Assistance](#)

[Customer Service Contact Form](#)

The data controller processes the personal data of the operator (if he is a natural person) and of his representatives to the extent set out in the "I want to become a Balíkovna" or "I want to send parcels" web form or in the printed "Offer Sheet" for those interested in operating a Balíkovna Partner location, for the purpose of assessing possible cooperation between Balíkovna and the operator.

The legal basis for the processing of personal data is the taking of steps prior to the conclusion of a contract between Balíkovna and the operator. Personal data are retained for no longer than 6 months or, in the event of the conclusion of a contract for operating a Balíkovna Partner location, for the same period as the contract is retained. Providing personal data is voluntary; however, without them, the contract cannot be concluded.

Personal data may be provided, upon request, to third parties authorised to receive them under the relevant legal regulations. The data controller also processes personal data for purposes arising from the relevant legal regulations and for the purposes of its legitimate interests. The person completing the form or the Offer Sheet is obliged to inform the natural person whose personal data he provides to the data controller through the form or the Offer Sheet about the processing of personal data.

3.9 Communication through various channels

If the user of any service of the data controller communicates with the data controller through various channels, in particular through the customer centre, email, chat tools, electronic forms such as the [Contract Customer Assistance](#) form or the [Customer Service Contact Form](#) and social media, the data controller will process the identification and contact details of the user and records of the communication carried out, including call recordings, on the basis of the legitimate interest of the data controller, and therefore without the user's consent. Such processing of the user's personal data will be carried out for the purpose of:

- handling users' requests. If the user is also the customer ordering a service of the data controller and his request relates to the order, the data controller may carry out this processing on the basis of the performance of the contract with the user
- handling users' requests. If the user is also the Addressee of a parcel and his request relates to the parcel, the data controller may carry out this processing on the basis of its legitimate interest
- recording users' requests. So that the data controller can check that it fulfils them duly and on time

- demonstrating that the data controller has received and handled the user's request, for example when the user lodges a claim with the data controller
- analysing them for improving the quality of the data controller's services

For purposes related to the provision of services, the data controller may retain the data for the protection of legal claims for the duration of the limitation period of 3 years and for one year after its expiry, taking into account claims asserted at the end of the limitation period. In the event that judicial, administrative or other proceedings are initiated, the data controller will process personal data to the necessary extent for the entire duration of such proceedings and for the remaining part of the limitation period after their conclusion. For the purpose of analysis aimed at improving the quality of the data controller's services, personal data are retained for a period of 6 months. The data subject has the right to raise an objection to processing based on the legitimate interest of the data controller.

3.10 Processing of personal data in the context of public procurement

The data controller processes personal data for the purpose of administering procurement procedures under the Act No. 134/2016 Coll., on public procurement (hereinafter referred to as "the PPA"), as well as selection procedures carried out outside the regime of the PPA under the contracting authority's internal regulations.

Categories of processed personal data:

- Identification details of participants in the procedure and their subcontractors, members of their governing bodies and members of implementation teams (name, surname, academic title)
- Contact details of the above-mentioned persons (email, phone)
- Bank details of participants in the procedure
- Details recorded in the Commercial Register of participants in the procurement procedure and their subcontractors
- Details of participants' arrears in social security and taxes
- Details of entries concerning participants and members of their governing bodies in the Criminal Register
- Details of education and professional qualifications, and where applicable, other details stated in the curricula vitae of members of implementation teams submitted in the bids of participants in the procedure
- Personal data form part of bids / requests to participate and similar sets of documents, including clarifications of procurement documentation and other documents from suppliers submitted/sent within procurement / selection procedures, and as such are archived by the contracting authority for 10 years in accordance with the PPA. In the event of a review of the award of a public contract, personal data may be provided to the Office for the Protection of Competition or another administrative or judicial authority with supervisory powers.
- Some personal data are also published to the extent laid down by the PPA (identification and address details of participants in procurement procedures and of the selected supplier).

Processing of data to the above extent is necessary for compliance with the legal obligation of the data controller within the meaning of Article 6(1)(c) of the GDPR.

3.11 Processing of personal data in connection with the assessment of the creditworthiness and reliability of the consumer

The data controller processes the personal data of its customers on the basis of the conditions set out in the Act No. 634/1992 Coll., on consumer protection, for the purpose of assessing the ability of the consumer (entrepreneurs) to meet his obligations and for preventing fraudulent conduct. Under this legislation, the data controller obtains and provides information on the creditworthiness of consumers, their payment discipline and their reliability, by exchanging such information within information registers established under the above Act.

The scope of processed personal data on the part of the data controller is determined by the Act No. 634/1992 Coll.:

- Identification details of the consumer
- details of the consumer's financial obligations arising from contracts between the consumer and sellers using the register, and also
- the time specification of the period to which the data relate

The recipients of personal data in this case are entities designated as register operators under the Act No. 634/1992 Coll., who are independent data controllers.

The data controller currently cooperates with the REPI Register. Further information concerning the REPI Register, including information on clients' rights in connection with the REPI Register, is set out in the REPI Register Information Memorandum, the current version of which is available on www.repi.cz.

3.12 Identification and verification of the client in the area of preventing the laundering of proceeds of crime and the financing of terrorism

Česká pošta, s.p., a company having its registered office located at Politických vězňů 909/4, 225 99 Prague 1, registered under registration number 47114983 in the Commercial Register maintained by the Municipal Court in Prague, Section A, File 7665, including its Odštěpný závod Balíkové služby ("the data controller" or "Balíkovna"), is an obliged entity under the Act No. 253/2008 Coll., on certain measures against the legalisation of proceeds of crime and the financing of terrorism, as amended ("the AML"), and in view of this fact certain obligations arise for it under this Act.

On the basis of the above Act, Česká pošta, s.p., Odštěpný závod Balíkové služby as the data controller is authorised to obtain and process information and personal data about clients (data subjects) and, where applicable, also about their representatives (this concerns a legal representative, a person authorised by a letter of authorisation, and a guardian), and such data are further handled for the purpose of ensuring the obligations arising for the data controller from the AML Act, in accordance with the rules of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons in connection with the processing of personal data (GDPR). The personal data are subject to the highest possible level of organisational and technical protection.

The personal data of data subjects may also be transferred to the Financial Analytical Office (FAÚ) as the supervisory state authority in the AML area.

Extent of personal data processing

For natural persons (data from the submitted identity document)

- Name and surname
- Gender
- Birth number/date of birth
- Place of birth
- Details about the identity document (type and number of the document, date of issue, date of expiry, issuing authority), with the employee of the data controller simultaneously verifying that the likeness matches the image in the identity document
- Nationality
- Permanent residence
- Whether the person is a politically exposed person
- For entrepreneurs who are natural persons also the place of business and the business registration number
- Source of the funds used
- Purpose of the payment

For legal entities (from the document proving the existence of the legal entity submitted by the person acting on its behalf in the given transaction)

- Business name or name
- Registered office
- Business registration number
- Details of the beneficial owner (first name, surname, date of birth, nationality)
- Details of the governing bodies (name, surname, permanent residence address, date of birth)
- Details of the person acting on behalf of the legal entity in the given transaction (to the same extent as for natural persons)
- Source of the funds used
- Purpose of the payment

The data controller may, for the purpose of fulfilling the objective of the AML Act, make copies or extracts of the submitted documents and process the information thus obtained.

The data controller retains personal data for 10 years from the execution of the transaction or from the termination of the business relationship with the client, and this period begins on the first day of the calendar month following the calendar month in which the last known act of the transaction was carried out.

The data subject has the right to request from the data controller access to his personal data, their rectification or restriction of processing. In this case, the exercise of the data subject's right to erasure is limited, as the processing of personal data is necessary for the purposes of fulfilling the obligations arising for the data controller from the above legal regulations for the prescribed period. The data subject also has the right to lodge a complaint with the supervisory authority.

A politically exposed person within the meaning of the Act No. 253/2008 Coll. means:

- a natural person who is or has been in a prominent public function of national or regional importance, such as in particular the head of state, the prime minister, the head of a central government authority and his deputy (deputy minister, state secretary), a member of parliament, a member of the governing body of a political party, a senior representative of local self-government, a judge of the supreme court, the constitutional court or another supreme judicial authority whose decisions are generally not subject to appeal except in exceptional cases, a member of the board of the central bank, a senior officer of the armed forces or corps, a member or representative of a member, if the member is a legal entity, of the governing body of a business corporation controlled by the state, an ambassador or the head of a diplomatic mission, or a natural person who performs or has performed a similar function in another state, in an institution of the European Union or in an international organisation,
- a natural person who is
 - a person closely related to the person referred to above,
 - a partner or the beneficial owner of the same legal entity, or of a trust or other legal arrangement without legal personality, as the person referred to above, or a person known to the obliged entity to be in any other close business relationship with the person referred to above, or the beneficial owner of a legal entity, or of a trust or other legal arrangement without legal personality, which the obliged entity knows to have been created for the benefit of the person referred to above.

3.13 Verification of selected third parties

3.14.1 The data controller, in the context of entering into a contractual relationship with selected third parties, processes personal data for the purposes of pursuing its legitimate interests, which are the prevention of fraud, the protection of the data controller's assets and reputation.

Selected third parties that the data controller verifies before entering into a contractual relationship include in particular applicants for operating a Balíkovna Partner location, suppliers arising from the public procurement process, business partners whose services or products the data controller offers in postal networks, applicants for the purchase of the data controller's real estate and entities from which the data controller leases premises.

On the basis of the above and for the above purpose, the data controller obtains data concerning natural persons (whether acting independently or within legal entities) from publicly accessible registers and publicly accessible online sources including online media, to the extent published there.

Personal data are transferred to third parties in cases where this is necessary for the purposes of fulfilling a legal obligation.

The data controller retains personal data for 10 years from the completion of the verification.

4 Rights of data subjects

The customer, as a data subject, has all rights granted by Regulation (EU) 2016/679 – the General Data Protection Regulation – and by other legal regulations.

The customer has the right to request from the data controller information on whether his personal data are or are not being processed and, if they are, he has the right to obtain access to the personal data concerning him. The customer also has, in a relevant case, the right to rectification or erasure, or to restriction of the processing of personal data, the right to withdraw consent given and the right to object to the processing. Where personal data are processed automatically on the basis of consent or a concluded contract, the customer has the right to data portability, where technically feasible.

The data controller will always, without undue delay and no later than within one month of receiving the request, inform the data subject of the handling of his request, which may be submitted to the contact details of the Data Protection Officer indicated above.

In any case where the customer believes that his personal data are being processed unlawfully (in particular where the data controller does not respond to his request for information or for remedy, or where the customer disagrees with the data controller's reply), he may lodge a complaint with the supervisory authority, the **Supervisory Authority – [the Office for Personal Data Protection](#), with its registered office at Plk. Sochora 27, Prague 7, 170 00.**

Submitting a request is entirely free of charge. However, if multiple copies of the written response are requested, the data controller may charge a fee for the request. The same applies if the request is found to be unfounded or excessive. In such a case, the data controller is entitled to request a reasonable fee for handling the request based on administrative costs. Before any fee is charged, the data controller will inform the requester of its amount and request consent to the handling of the chargeable request.

If the request is not granted, the data controller will inform the requester no later than within one month of receiving the request, and within the same period will inform the requester of the reasons for refusal and of the possibility to lodge a complaint with the supervisory authority and to seek judicial protection. If the data controller assesses the request as manifestly unfounded or excessive, it has the right to refuse the request or to require a reasonable fee for its handling based on administrative costs (see the paragraph above). The data controller will always inform the requester of the outcome of the handling of the request.

The customer may submit a request in one of the following ways:

- By data mailbox: Data mailbox ID: kr7cdry
- By email with a certified signature to: gdpr@cpost.cz
- By letter with an officially certified signature on the request form mailed to the address of the Data Protection Officer: Mgr. Jitka Pišl Drábková, Politických vězňů 909/4, 225 99 Prague 1
- By personal submission at a branch office of the data controller or at a Partner Post Office after prior identification of the requester.

The data controller recommends choosing electronic communication with the Data Protection Officer in order to speed up the response to the request.

A request may also be submitted using an electronic form available for download [here](#).

Every request, whether submitted in writing or in electronic form, through the above-mentioned form or otherwise, must contain the following particulars:

Identification of the requester

Completion of the requester's personal data is mandatory. If the requester is also an employee of Česká pošta, a.s., he also provides his employee number. If he is a former employee of Česká pošta, a.s., he does not provide the employee number. The requester is obliged to provide data that correspond to the data shown in the valid identity document with which he identifies himself at the post office. If the request is submitted in paper form at a branch, the postal employee is obliged to verify the requester's identification data by viewing the identity document presented. For the smoothest possible communication, the data controller recommends providing a contact phone number (an optional detail) on which the requester can be contacted directly to resolve any uncertainties regarding the request.

Representative of the requester

If the requester is represented when submitting the request, the representative must present a power of attorney or another document containing all mandatory identification data of the requester. The representative of the requester will provide all required personal data on the basis of his valid identity document. The postal employee is obliged to verify the completed identification data of the requester and his representative by viewing the identity document presented by the requester and simultaneously viewing the power of attorney or other document of representation presented by the representative.

Request submitted by a child under 15 years of age

If the request is submitted by a child under 15 years of age, the child must be represented by a legal guardian (parent or custodian), in which case no document of representation is required and an oral declaration by the child's representative confirming the correctness of the requester's (the child's) data is sufficient. The child's representative will present his valid identity document to the postal employee for verification of the accuracy of the personal data he has completed.

Communication with the data controller

If the requester does not indicate a preferred method of communication (letter, email or data mailbox), the response to the request will be sent by letter to his contact or permanent address (except where the request was sent to the data controller by email or via a data mailbox, in which case it will be answered in the same manner). For optimal communication, the data controller recommends using email or a data mailbox. A requester who submitted the request at a branch office and was therefore already identified at the time of submission and who selected email as the preferred communication channel in the submitted request does not need a certified signature for further communication with the data controller by email. (Unlike a requester who sends the request directly by email. In such a case, an email with the requester's certified signature is required.)

Exercise of rights

Proper identification of the requester is essential for the exercise of any rights. For the smoothest possible communication, the data controller recommends providing a contact phone number (an optional detail) on which the requester can be contacted directly by the Data Protection Officer or his representative to resolve any uncertainties regarding the request.

Right of access – Art. 15 of the Regulation

The applicant states which information relating to the given service he requests; if he does not do so, information will be provided in the full scope indicated, if it is processed, including a copy of the personal data processed. The first copy is free of charge, further copies may be subject to a fee.

Right to rectification – Art. 16 of the Regulation

If, under the rules set for the specific service, the requester proves that the data recorded by the data controller are incorrect, the data controller ensures that they are rectified.

Right to erasure – Art. 17 of the Regulation

Under certain rules, the data controller cannot ensure erasure, in particular if the data controller still needs the requester's data to provide the given service, as without them it would not be possible to provide the requested service to the requester.

Right to restriction of processing – Art. 18 of the Regulation

For the period during which the data controller rectifies the requester's data or verifies the legitimacy of their further processing, the processing of personal data is temporarily restricted. The data controller is obliged to inform the requester of the restriction and of the lifting of the restriction of the requester's personal data.

Withdrawal of consent to personal data processing

If the requester informs the data controller which consent he wishes to withdraw (ideally by describing it for the specific service), the data controller ensures that, for the purpose for which the consent was withdrawn, the requester's personal data are no longer processed.

Right to data portability – Art. 20 of the Regulation

If personal data are processed by automated means (i.e. wholly or partly using computer technology) on the basis of a contract or explicit consent, the requester has the right to have the personal data he has provided to the data controller transmitted to a data controller designated by the requester. This right is exercised by transmitting the personal data (which the data controller has received from the requester and which relate to him only) in a commonly used machine-readable format either directly to the requester or to another data controller, if the requester provides his contact details.

Right to object – Art. 21 of the Regulation

If the requester identifies the specific reason for processing under the service provided to him against which he lodges an objection, the data controller carefully considers this objection and assesses whether it is justified (the requester's rights outweigh the reasons for processing on the part of the data controller) or whether the processing will continue. If the requester lodges an objection to advertising, this is his right and we immediately stop sending it for the service he has identified or for all services, according to his request. In all cases, the requester is informed of the outcome of the objection assessment by the data controller.

Right to human intervention against automated decision-making – Art. 22 of the Regulation

The requester acknowledges that if the data controller carries out any automated decision-making, he will be informed of this already when the service is concluded. In such a case, he has the right to challenge the decision made by automated means and to request a human review of the decision.

5 Personal data protection measures

Personal data provided to the data controller may be processed in electronic or paper form. Taking into account the state of the art, the costs of implementation, the nature, scope, context and purposes of the processing of personal data provided to the data controller for the purpose of providing a postal service or a partial additional service, as well as the variously probable and variously serious risks to the rights and freedoms of the data subject, the data controller is obliged to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, in particular to take all measures to prevent unauthorised or accidental access to personal data, their alteration, destruction, loss, misuse or other unauthorised processing.

The data controller has therefore adopted these measures to safeguard personal data processed when providing postal services or partial additional services

- measures to ensure the security of personal data processing in both manual and automated processing;
- systems for automated processing of personal data and non-automated processes for processing personal data are managed only by authorised persons;
- natural persons authorised to use automated personal data processing systems only have access to personal data that correspond to the level of authorisation of those natural persons, subject to specific user authorisations established solely for those persons;
- records are taken to identify and verify when, by whom, and for what reason personal data have been recorded or otherwise processed;
- unauthorised access to data carriers carrying personal data is prevented;
- procedures for the protection of personal data are in place;
- procedures to reveal any violation of personal data (such as data loss or modification) are in place;
- integrity and availability of information are ensured;
- personal data processing contracts with external entities have been concluded;
- the data controller regularly monitors and controls personal data processing processes;
- the data controller regularly trains employees in security and personal data protection;
- the data controller has taken measures to ensure protection against malicious software;
- the data controller maintains a system of reporting, alerting, and investigating emergencies and security breaches;
- personal data are treated as confidential.

6 Recruitment of employees of Česká pošta, s.p. (data controller)

The data controller processes, for the purposes of the recruitment of its employees and the conduct of selection procedures, the personal data of job applicants to the extent required within the selection procedure and subsequently provided by the applicant (typically identification and contact details), including other data provided by the applicant during the selection procedure (in particular the curriculum vitae), on the legal basis of taking steps prior to entering into an employment contract (or an agreement to perform work or an agreement on work activity).

The personal data of an unsuccessful job applicant are retained for no longer than 6 months unless he has consented to a longer retention period for the purpose of being contacted with a possible future job offer. A specialised form forming part of the selection procedure, containing the GDPR-required particulars, is used to request the applicant's consent for his data provided for the selection procedure to be processed beyond the above 6-month period, for no longer than 5 years from the granting of such consent. The purpose of such processing of personal data is the inclusion of the job applicant in the job applicant database. On this basis, the data controller may inform the applicant of vacancies corresponding to his suitability for an available position.

During the recruitment process, the data controller may use automated decision-making when processing the personal data of applicants, exclusively in connection with assessing whether the applicant meets the requirements that are absolutely essential for performing the given job (e.g. holding a driving licence for the position of a motorised delivery worker). In other cases, automated decision-making does not take place. Automated decision-making is carried out through logical and/or algorithmic operations. The purpose of automated decision-making is to verify whether the applicant meets the essential requirements for performing the given job. The consequence of automated decision-making is a decision on whether the applicant will continue in the selection procedure.

The data controller may also process the personal data of job applicants (i.e. future employees) for the purpose of conducting employee surveys (the aim of employee surveys is to improve onboarding processes, map the experiences of job applicants with the selection procedure, guide new employees through the adaptation period, and continuously verify employees' satisfaction and needs, etc.), to the extent of identification and contact details, IP address, and any other data provided by the job applicant within the employee survey. The legal basis for such processing is the data controller's legitimate interest. The retention period for personal data is 25 months. An objection may be lodged against this processing.

If the data controller uses contractual processors in the course of the selection procedure, they are listed in the [processor list](#).

A job applicant may exercise his rights under the GDPR in the same manner as a customer, as set out in section 4 Rights of the Data Subject.

Information on the processing of personal data for advertisements on online portals offering inclusion in the database of candidates for employment with the data controller:

For the purpose of including the requester in the database of candidates for employment with Česká pošta, s.p., business registration number: 47114983, with its registered office located at Politických vězňů 909/4, Prague, Nové Město (hereinafter also referred to as "the data controller"), and for the purpose of a possible offer of a suitable job position, the data controller will process the personal data provided (or obtained from public sources), in accordance with the General Data Protection Regulation 2016/679 (GDPR). The processing of personal data will be carried out for the data controller by Alma Career Czechia s.r.o., business registration number: 26441381, through its electronic systems.

By responding to the advertisement, the requester provides the data controller with his personal data for the purpose of including him in the database of candidates for employment with the data controller and for the purpose of a possible offer of a suitable job position. The requester's personal data will be processed on the basis of the consent granted by the requester for this purpose for a period of 5 years. Consent may be withdrawn at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. Personal data will be made accessible only to authorised employees of the data controller, and only to the extent necessary for the purposes of processing.

In connection with the processing of the requester's personal data, he has the following rights:

- the right of access to personal data,
- the right to rectification or completion of inaccurate or incorrect personal data,
- the right to erasure of personal data if the personal data are no longer needed for the purposes for which they were collected or otherwise processed, or if it is found that they were processed unlawfully,
- the right to restriction of personal data processing in specific cases,
- the right to data portability,
- the right to lodge an objection, after which the processing of personal data will be terminated unless it is demonstrated that there are compelling legitimate grounds for the processing which override the requester's interests or rights and freedoms, in particular where the reason is the possible enforcement of legal claims,
- the right to contact the Office for Personal Data Protection.

Further information on the processing of personal data by the data controller is available at <https://www.balikovna.cz/en/right-and-gdpr>. Further information on the processing of personal data by Alma Career Czechia s.r.o. is provided by the Data Protection Officer, email address: DPO-CZ@almacareer.com, or is available at [almacareer.com/gdpr](https://www.almacareer.com/gdpr).