

Fpt Czech, s.r.o. - Notification obligations

The Company **Fpt Czech s.r.o.** with registered office at Limuzská 3135/12, Strašnice (Praha 10), 108 00 Praha, Czech Republic, ID number 033 470 52, (hereinafter referred to as the "**Company**") as an **Administrator** hereby in accordance with its information obligation under Articles 13 and 14 of Regulation of the European Parliament and Council (EU) 2016/679 of April 27 2016 on the protection of natural persons in the processing of personal data and on the free movement of such data which repeals Directive 95/46/EC (general regulation on the protection of personal data) (hereinafter referred to as the "**EU Regulation**") and the Act on the processing of personal data no. 110/2019 Coll. and on the amendment and addition of certain laws (hereinafter referred to as the "**Law**") provides data subjects with the information below on the processing of data subjects' personal data by the Administrator. Data subject means an identified or identifiable natural person whose personal data is the subject of processing.

The Company Fpt Czech s.r.o., through the **policy** of the Integrated management System, accepted among other things, the Company's commitment to maintaining a high level of information security, including the protection of personal data. The Company has implemented and maintains an **information security management system** in accordance with the requirements of the ISO/IEC 27001:2013 standard as part of the Integrated management system. The Company regularly performs an information security **audit** in the form of internal or external audits. The Company has an ISO/IEC 27001:2013 **certificate** for the information security management system issued by the certification body SNR Certification SK&CZ s.r.o.

1. Identification and contact details of the Administrator

Business name:	Fpt Czech s.r.o.
Headquarters:	Limuzská 3135/12 Strašnice (Praha 10) 108 00 Praha, Czech Republic
ID number:	033 470 52
Entry in the Commercial Register:	District Court Košice I, section.: Sro, insert no.: 16040/V
E-mail address:	svk.contact@fpt.sk
Address for correspondence:	Limuzská 3135/12 Strašnice (Praha 10) 108 00 Praha, Czech Republic
Telephone contact:	+421 55 610 16 00
Contact email of the person responsible for data protection supervision:	OsobneUdaje@fpt.sk

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2. Purposes and legal bases of personal data processing

Your personal data will be processed on the basis of special legal regulations and purposes, which are determined by the Administrator:

Purpose of processing	Legal basis of processing activities	Categories of persons concerned	Category beneficiaries	Deadline for deletion of the personal data
<i>Fulfilling the employer's obligations relating to the employment relationship and similar relationships</i>	<i>Article 6, par.1, letter b) GDPR (relevant employment contract or agreement)</i>	<i>employees, spouses of employees, dependent children of employees, parents of dependent children of employees, close relatives, former employees</i>	<i>Accace s.r.o., FPT SOFTWARE COMPANY LIMITED, FPT Slovakia, s.r.o.</i>	<i>up to 70 years of age or 50 years after termination of employment</i>
<i>Employer's pay policy</i>	<i>Act No. 262/2006 Coll., Labor Code Act No. 589/1992 Coll., on social security premiums and contribution to state employment policy Act No. 155/1995 Coll., on pension insurance Act No. 426/2011 Coll., on pension savings Act No. 427/2011 Coll., on supplementary pension savings Act No. 582/1991 Coll., on the organization and implementation of social security Act No. 110/2006 Coll., on living and subsistence minimum Act No. 397/2012 Coll., on insurance premiums for retirement savings Act No. 300/2020 Coll., on the waiver of social security premiums and contributions to the state employment policy paid by certain employers as taxpayers in connection with extraordinary measures during the epidemic in 2020 and on the amendment of Act No. 187/2006 Coll., on sickness insurance, as amended Decree No. 359/2009 Coll., on disability assessment Act No. 48/1997 Coll., on public health insurance Act No. 592/1992 Coll., on premiums for public health insurance Act No. 435/2004 Coll., on employment Regulation of European Parliament and Council (EU) 2021/1060 of 24 June 2021 on common provisions for the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Fair Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and on the financial rules for these funds and for the Asylum, Migration and integration fund, the Internal security fund and the Instrument for financial support for border management and visa policy</i>	<i>employees, dependent children of employees, former employees</i>	<i>health insurance companies, social insurance company, tax office, supplementary pension company, FPT Slovakia, s.r.o.</i>	<i>up to 70 years of age or 50 years after termination of employment</i>

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<p>Fulfilling the employer's obligations towards the social insurance institution</p>	<p>Act No. 589/1992 Coll., on social security premiums and contribution to state employment policy Act No. 155/1995 Coll., on pension insurance Act No. 426/2011 Coll., on pension savings Act No. 427/2011 Coll., on supplementary pension savings Act No. 582/1991 Coll., on the organization and implementation of social security Act No. 110/2006 Coll., on living and subsistence minimum Act No. 397/2012 Coll., on insurance premiums for retirement savings Act No. 300/2020 Coll., on the waiver of social security premiums and contributions to the state employment policy paid by certain employers as taxpayers in connection with extraordinary measures during the epidemic in 2020 and on the amendment of Act No. 187/2006 Coll., on sickness insurance, as amended Decree No. 359/2009 Coll., on disability assessment</p>	<p>employees, spouses of employees, dependent children of employees, parents of dependent children of employees, close relatives, former employees</p>	<p>social insurance company</p>	<p>10 years</p>
<p>Fulfilling the employer's obligations towards the health insurance company</p>	<p>Act No. 48/1997 Coll., on public health insurance Act No. 592/1992 Coll., on premiums for public health insurance</p>	<p>employees, spouses of employees, dependent children of employees, parents of dependent children of employees, close relatives, former employees</p>	<p>health insurance companies</p>	<p>10 years</p>
<p>Fulfilling tax obligations</p>	<p>Act No. 586/1992 Coll., on income taxes Act No. 280/2009 Coll., Tax Code</p>	<p>employees and their close relatives</p>	<p>Tax office</p>	<p>10 years</p>
<p>Fulfilling the employer's obligation in the area of health and safety (OSHA agenda)</p>	<p>Government regulation No. 361/2007 Coll., which establishes the conditions for health protection at work Act No. 250/2021 Coll., on occupational safety in connection with the operation of reserved technical equipment and on the amendment of related laws Government regulation No. 94/2022 Coll., on requirements for professional competence to perform work on electrical equipment and professional competence in electrical engineering Decree No. 246/2001 Coll., on fire prevention Act No. 133/1985 Coll., on fire protection Act No. 309/2006 Coll., on ensuring other conditions of safety and health protection at work</p>	<p>employees</p>	<p>training entity, FPT Slovakia, s.r.o.</p>	<p>5 years after the end of the obligation or the termination of the obligation</p>
<p>Presentation, promotion of the company consisting in the publication of photographs from events organized by the company</p>	<p>Art. 6 paragraph 1 letter f) GDPR (legitimate interest of the administrator)</p>	<p>employees, their family members</p>	<p>marketing agency</p>	<p>for a period of 3 years from the date of the event, selected photos can be kept for a longer period (from the date of the company's establishment) as part of archival footage used in the communication of the company's historical milestones</p>
<p>Presentation, promotion of the operator and the Fpt group consisting of the publication of photos and video footage of employees</p>	<p>Article 6 paragraph 1 letter a) GDPR (Approval)</p>	<p>employees</p>	<p>FPT Slovakia, s.r.o.</p>	<p>in terms of consent granted</p>
<p>Registration of job applicants</p>	<p>Article 6 paragraph 1 letter a) GDPR (Approval)</p>	<p>job applicants</p>	<p>LMC s.r.o., FPT Slovakia, s.r.o. AMP DIGITAL SOLUTIONS, s.r.o.</p>	<p>1 year/ from 8_2022 for 2 years</p>

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<i>Fulfillment of obligations</i>	<i>Article 6, par.1, letter b) GDPR (fulfillment of the contract), Article 6, par.1, letter f) GDPR (legitimate interest of the company), Act No. 634/1992 Coll. on consumer protection, Act No. 89/2012 Coll., the Civil Code, Act No. 90/2012 Coll., on Business Companies and Cooperatives (Act on Business Corporations)</i>	<i>customers, suppliers, their employees, contact persons</i>	<i>FPT Slovakia, s.r.o.</i>	<i>Until the due fulfillment of the obligation relationship (during its duration and until the expiry of the deadlines for applying any claims, but a maximum of 3 years from the fulfillment of the subject of the obligation relationship. Or for a period determined by a special regulation.</i>
<i>Processing of accounting, bookkeeping and economic documents</i>	<i>Act No. 563/1991 Coll., on accounting Act No. 235/2004 Coll., on value added tax Act No. 634/2004 Coll., on administrative fees Act No. 89/2012 Coll., Civil Code Act No. 262/2006 Coll., Labor Code Act No. 90/2012 Coll., on Business Companies and Cooperatives (Act on Business Corporations)</i>	<i>employees, customers, suppliers</i>	<i>external tax advisers and auditors, tax office, FPT Slovakia, s.r.o.</i>	<i>10 years</i>
<i>Mutual communication</i>	<i>Article 6, par.1, letter a) GDPR (approval), Article 6, par.1, letter f) GDPR (legitimate interest of the company)</i>	<i>any person concerned</i>	<i>FPT Slovakia, s.r.o.</i>	<i>max. 1 year after termination of communication</i>
<i>Collective Labor relations</i>	<i>Act No. 262/2006 Coll., Labor Code Collective agreement Regulation of the European Parliament and Council (EU) 2021/1060 of 24 June 2021 on common provisions for the European regional development fund, the European social fund plus, the Cohesion fund, the Just transition fund and the European maritime, Fisheries and aquaculture fund and on financial rules for these funds and for the Asylum, migration and integration fund, the Internal security fund and the Instrument for financial support of border management and visa policy</i>	<i>employees</i>	<i>employee representatives, FPT Slovakia, s.r.o.</i>	<i>10 years</i>
<i>Recording and handling of complaints submitted for the investigation of anti-social activities</i>	<i>Whistle-blower protection act - in preparation</i>	<i>the person submitting the complaint and other persons necessary for the investigation of the complaint</i>	<i>FPT Slovakia, s.r.o.</i>	<i>until the purpose is fulfilled and in accordance with the law specified in the legal basis</i>
<i>Handling requests from data subjects to request the exercise of their rights</i>	<i>GDPR Regulation Act No. 110/2019 Coll., on the processing of personal data</i>	<i>Persons concerned</i>	<i>IT ASSISTANCE, s.r.o.</i>	<i>until the applications are properly processed</i>

3. Provision of personal data

We make your personal data available only to the extent absolutely necessary and always while maintaining the confidentiality of the recipient of the data. Depending on the purpose of processing and specific circumstances, typical recipients of your personal data include:

insurance companies;

- FPT Slovakia, s.r.o. (Parent company);
- state administration and public authorities;
- the insurance companies;
- law enforcement authorities;
- foreign police;
- providers of standard software, cloud or hosting services (e.g. Microsoft 365, Atlasian, etc.) or technical support for our Company;

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- providers of analytical tools (e.g. Google);
- our Company's employees and authorities;

4. Personal data transferred to third countries or international organizations

The transfer of personal data to third countries or international organizations does not take place. Anonymized statistics are provided for Vietnam, FPT SOFTWARE COMPANY LIMITED.

5. Profiling

The company does not perform automated profiling – such processing operations based on which decisions with legal effect or other significant influence on your person would be taken, which would be based exclusively on fully automated processing of your personal data.

6. Cookies

Cookies are small text files that improve the use of the website, e.g., by making it possible to identify previous visitors when logging in to the user environment, by remembering the visitor's choice when opening a new window, measuring website traffic or how it is used to improve its user experience. Our website uses cookies mainly for the purposes of basic / general traffic measurement. In addition, these technologies help us better understand user behaviour. Although the information collected through cookies and other similar technologies, typically of an impersonal nature, to the extent that Internet Protocol (IP) addresses and similar identifiers are considered personal data by law, we treat these identifiers as personal data.

6.1. What cookies do we use and why?

- **Necessary (technical) cookies**

Some cookies are needed to provide basic functions. The website would not work properly without it. They are enabled by default and cannot be deactivated or deleted.

- **Analytical cookies**


Analytical cookies help us improve our website by collecting and reporting information about its use. This data is used primarily to optimize the functionality of our website.

These cookies contain information about how you work with our website - as an anonymous user (the data collected **does not personally identify you**).

- **Marketing cookies**

Marketing cookies are used to track visitors across the website so that publishers can display relevant and engaging advertising.

We use cookies to customize content and advertising, provide social media functions, and analyse traffic. We also provide information on how you use our website to our social media, advertising and analytics partners. These partners may combine the relevant information with other information you have provided or obtained from you when you have used their services.

The detailed description of the cookies we process is given on our website in the cookie statement by clicking on the icon  in the lower left corner of the screen.

7. Security of your personal data

The protection of personal data in our Company is not a novelty related to the acceptance of current legislative standards. Our Company has been fulfilling its obligations and commitments regarding personal data protection for a long time. We have implemented and use an information security

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management system certified according to ISO / IEC 27001: 2013, which includes appropriate technical, personnel and organizational measures to protect personal data from accidental or unlawful destruction, accidental loss or change, unauthorized disclosure, access, storage or transmission and against all other forms of unlawful processing, including the inappropriate collection or further processing of personal data. These measures ensure a sufficient level of protection of personal data in accordance with the principles of the EU Regulation.

8. Data subject rights

The EU regulation sets out the general conditions of your individual rights. However, their existence does not automatically mean that when applying individual rights, they will be satisfied by us, as in a specific case, exceptions or some rights are linked to specific conditions, which may not be met in every case. We will always consider and examine your request for a specific legislation and applicable exceptions.

As a data subject, you have in particular:

- **right to request access** to personal data according to article 15 of the EU Regulation that we process on you. This right includes the right to confirm whether we process personal data about you, the right to access this data and the right to obtain a copy of the personal data we process about you, if technically feasible. The withdrawal of consent does not affect the lawfulness of the processing of personal data that we have processed about you on its basis;
- **right to rectification and completion** of personal data according to article 16 of the EU Regulation if we process incorrect or incomplete personal data; We strive to ensure the accuracy, completeness and timeliness of the information we have about you.
- **right to erasure** according to article 17 of the EU Regulation; you have the right to ask us to erase your personal data, but your right must be assessed from the perspective of all relevant circumstances.
- **right to restriction of processing** of personal data according to article 18 of the EU Regulation; If you think that the personal information, we hold about you may be inaccurate or if you think that we no longer need to use your personal information, you may ask us to stop using your personal information.
- **right to data portability** according to article 20 of the EU Regulation if the processing of personal data is based on a legal basis of consent under the performance of the contract;
- if we process personal data about you on the basis of your consent to the processing of personal data, you have the right to **withdraw your consent** at any time;
- **the right** at any time to **object** effectively to the processing of personal data for the purposes of direct marketing (only a sending of a marketing newsletter); you can apply this right either by unsubscribing from the text of each marketing-oriented email or by sending an objection to our contact details below;
- **right to lodge a complaint** at the Office for Personal Data Protection of the Czech Republic at any time or to deal with the action in the competent court. In any case, we recommend resolving any disputes, questions or objections primarily by communicating with our Company.

All questions and comments on the protection of personal data, or requests for exercising the rights under the EU Regulation, you can send to the contact points listed in the introduction of this document in chapter "1. Identification and contact details of the Company".

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The Administrator is eligible to update and supplement this document, by which it fulfils its notification obligation on the processing of personal data towards the data subject.

The Administrator continuously updates this document and publishes it on its website.

FPT INTERNAL