

INFORMATION ON PERSONAL DATA PROCESSING

In compliance with European Parliament and Council Directive (EU) 2016/679 on the protection of physical entities in relation to personal data processing and free movement of the data (hereinafter referred to as „Directive“), ČD Cargo, a.s., CRN 28196678, with head office Jankovcova 1569/2c, Post Code 17000, Praha 7 (hereinafter referred to as „ČD Cargo“ or also as the „Administrator“), as the personal data administrator herewith informs you on the relevant matters related to the processing of your personal data. Information on personal data processing, with the exception of joint information, are divided according to agenda subject to personal data processing.

ČD Cargo is fully aware of the importance of personal data processing and places high emphasis on observing your rights related to personal data processing.

1. JOINT INFORMATION

- 1.1. ČD Cargo, as the administrator of your personal data, processes personal data in compliance with the European Union right, in compliance with international contracts binding for the Czech Republic, and in compliance with the regulations of the Czech Republic.
- 1.2. ČD Cargo processes your personal data in a transparent way. In compliance with the Directive, you can apply the rights below during your personal data processing:
 - 1.2.1. right to access your personal data,
 - 1.2.2. right to correct and complete your personal data, if you find out ČD Cargo processes inaccurate and/or incomplete personal data,
 - 1.2.3. right to delete your personal data; your personal data will be deleted by ČD Cargo providing:
 - (a) Personal data is no longer required for the purposes it was collected or otherwise processed,
 - (b) You withdrew your consent for personal data processing, and there is no legal reason for the data processing,

- (c) You raise objections against personal data processing based on legitimate interest, and there are no prevailing legitimate reasons for the processing, or you raise an objection against personal data processing for the direct marketing purposes,
 - (d) ČD Cargo processes your personal data illegally,
 - (e) Your personal data must be deleted to fulfil the legal obligation defined in the law of the EU, the Czech Republic, and any other member state which applies to ČD Cargo,
 - (f) Your personal data was collected in relation to the offer of services from an information company,
- 1.2.4. restriction of your personal data processing,
 - 1.2.5. raise an objection against processing,
 - 1.2.6. right to transfer your personal data to another administrator,
 - 1.2.7. File a complaint to the Office for Personal Data Protection, if you think ČD Cargo proceeds in breach with the legal regulations during personal data processing.
- 1.3. Since ČD Cargo is not obliged to appoint a representative for personal data protection as per 37 and the Directive, the representative was not appointed by ČD Cargo.
- 1.4. In case of any questions and/or applications related to the protection of your personal data, you can contact ČD Cargo on the below contacts:

Address: ČD Cargo, a.s.
Specialist for personal data protection
Jankovcova 1569/2c
170 00 Praha 7 – Holešovice

email : gdpr@cdcargo.cz

IDS: 8tscdpq

During communication with ČD Cargo, always add „personal data“.

- 1.5. ČD Cargo reserves the right to adequately verify our identity as the applicant for the respective rights.
- 1.6. Your request and/or application will be settled without unnecessary delay, at the latest within one month from delivering the request and/or application. If one month deadline cannot be observed, it will be adequately extended, at the latest by two more months.

2. INFORMATION ACCORDING TO INDIVIDUAL AGENDA

2.1. Registry

- **Purpose of processing:** Receiving and sending mail
- **Categories of personal data:** Address and identification data
- **Categories of data subjects:** all types of subjects
- **Categories of data recipients:** There are no other recipients
- **Preservation period:** 5 years - shredding
- **Legal base:** Entitled interest (particularly the mail review)

2.2. Contracts, orders, contract filing

- **Purpose of processing:** Implementation of contractual relations, price definition for the transport and contract completion, the provision of contractual materials, customer - supplier services
- **Categories of personal data:** Address and identification data, description data, signature
- **Categories of data subjects:** all types of subjects
- **Categories of data recipients:** There are no other recipients
- **Preservation period:** without limits - archive

- **Legal base:** The fulfilment of contract and/or negotiation before the contract conclusion and/or legal regulations and authorised interest in relation to persons defined in the contract (particularly the provision of appropriate and continual contract fulfilment)

2.3. Filing the subjects

- **Purpose of processing:** Implementation of mutual relations
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** all types of subjects
- **Categories of data recipients:** There are no other recipients
- **Preservation period:** without limits - archive
- **Legal base:** The fulfilment and/or negotiations before the contract conclusion

2.4. Reception

- **Purpose of processing:** review of the visits
- **Categories of personal data:** IDENTIFICATION data
- **Categories of data subjects:** all types of subjects except for the administrator's employees
- **Categories of data recipients:** no recipients
- **Preservation period:** 5 years - shredding
- **Legal base:** Entitled interest (particularly the protection of property and health)

2.5. Economic management of the building

- **Purpose of processing:** Operation provision
- **Categories of personal data:** Address and identification data, description data

- **Categories of data subjects:** all types of subjects except for the administrator's employees
- **Categories of data recipients:** no recipients
- **Preservation period:** 5 years - shredding
- **Legal base:** The fulfilment and/or negotiations before the contract conclusion

2.6. Administration support of the Office of the Chairman of the Board of Directors

- **Purpose of processing:** Administration provision
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** all types of subjects
- **Categories of data recipients:** There are no other recipients
- **Preservation period:** 3 years - shredding
- **Legal base:** Entitled interest (particularly the company operation organisation)

2.7. Partner cards for railway transport companies

- **Purpose of processing:** Provision of transportation
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** Customers (clients) of the administrator, contractual foreign partners
- **Categories of data recipients:** There are no other recipients
- **Preservation period:** 5 years - shredding
- **Legal base:** The fulfilment and/or negotiations before the contract conclusion

2.8. Solving safety events

- **Purpose of processing:** Safety provision
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** all types of subjects
- **Categories of data recipients:** Police of the Czech Republic
- **Preservation period:** 5 years - shredding
- **Legal base:** Entitled interest (safety provision)

2.9. Safety inspection

- **Purpose of processing:** Inspection activity, safety provision
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** all types of subjects
- **Categories of data recipients:** There are no other recipients
- **Preservation period:** 5 years - shredding
- **Legal base:** Entitled interest (safety provision)

2.10. Internal audit

- **Purpose of processing:** Inspection activity
- **Categories of personal data:** Address and identification data
- **Categories of data subjects:** all types of subjects
- **Categories of data recipients:** There are no other recipients

- **Preservation period:** 10 years - shredding
- **Legal base:** Entitled interest (particularly the provision of methodical access to evaluation and the improvement of risk management system, control and inspection processes, and the organisation administration)

2.11. Settlement of complaints

- **Purpose of processing:** Settlement of complaints
- **Categories of personal data:** Address and identification data
- **Categories of data subjects:** all types of subjects
- **Categories of data recipients:** There are no other recipients
- **Preservation period:** 5 years – shredding (in serious cases archive – no restrictions)
- **Legal base:** Entitled interest (particularly the provision of the company internal acting in compliance with legal and other regulations, the provision of improved company function)

2.12. Administration within personal data processing

- **Purpose of processing:** Settlement of requests and related agenda administration
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** all types of subjects
- **Categories of data recipients:** Public administration bodies
- **Preservation period:** 5 years – shredding (in serious cases archive – no restrictions)
- **Legal base:** Legal regulation (particularly within personal data protection) and authorised interest (legal protection of ČD Cargo)

2.13. Marketing activities

- **Purpose of processing:** Organisation of customer and employee events

- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** Employees of the administrator and customers
- **Categories of data recipients:** Partners of the events
- **Preservation period:** 5 years - shredding
- **Legal base:** Entitled interest and consent for taking photos

2.14. Camera systems and photo traps

- **Purpose of processing:** Particularly the protection of property, lives, and health, the provision of safe railway operation, the specification of causes of exceptional events and other damaging events
- **Categories of personal data:** Description data
- **Categories of data subjects:** All subjects within ČD Cargo perimeter
- **Categories of data recipients:** Criminal procedure bodies
- **Preservation period:** 3 years - shredding
- **Legal base:** Entitled interest (particularly the protection of property and life)

2.15. Recruitment procedure for free positions

- **Purpose of processing:** Recruitment of new employees
- **Categories of personal data:** Defines the employment candidates
- **Categories of data subjects:** employment candidates
- **Categories of data recipients:** There are no other recipients
- **Preservation period:** 5 years - shredding
- **Legal base:** The fulfilment and/or negotiations before the contract conclusion, consent in case of CV filing for further offers

2.16. Secondary school, university practise

- **Purpose of processing:** Practise for students
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** students
- **Categories of data recipients:** There are no other recipients
- **Preservation period:** 5 years - shredding
- **Legal base:** The fulfilment and/or negotiations before the contract conclusion

2.17. OHS

- **Purpose of processing:** protection of health
- **Categories of personal data:** Address and identification data, description and sensitive data
- **Categories of data subjects:** Employees of the administrator and persons in ČD Cargo premises
- **Categories of data recipients:** Work inspections, insurance companies
- **Preservation period:** 5 years - shredding
- **Legal base:** Legal regulations (particularly in the area of civil and labour law)

2.18. Disputes (compensation of damages, debts of all types, work related injuries and other disputes)

- **Purpose of processing:** Protection of ČDC rights (legal protection and application of the company legal entitlements)
- **Categories of personal data:** Address and identification data, description and sensitive data
- **Categories of data subjects:** all types of subjects

- **Categories of data recipients:** Particularly court, executor, insolvency administrator, lawyers
- **Preservation period:** without limits - archive
- **Legal base:** Legal regulations and/or entitled interest (particularly the company legal protection and the enforcement of the company legal entitlements)

2.19. Criminal-legal agenda

- **Purpose of processing:** Protection of the administrator's rights (the company legal protection)
- **Categories of personal data:** Address and identification data, description and sensitive data
- **Categories of data subjects:** all types of subjects
- **Categories of data recipients:** Particularly OČTŘ, executor, insolvency administrators
- **Preservation period:** 5 years – shredding, contracts and assessments of serious significance without restrictions - archive
- **Legal base:** Legal regulations and/or entitled interest (particularly the company legal protection)

2.20. Request for the information provision

- **Purpose of processing:** Settlement of requests
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** Particularly journalists, physical entities from associations, etc.
- **Categories of data recipients:** no recipients
- **Preservation period:** 5 years - shredding
- **Legal base:** Entitled interest (particularly the company legal protection)

ČD Cargo also highlights that it is not an obligatory subject according to act no. 106/1999 Coll., on free access to information

2.21. Authorisation and Power of Attorney

- **Purpose of processing:** For processing and maintaining the authorisations and power of attorneys issued by ČD Cargo to the respective employees and other persons
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** all types of subjects
- **Categories of data recipients:** According to the purpose of the authorisation and power of attorney
- **Preservation period:** without limits - archive
- **Legal base:** The fulfilment of contract and/or negotiation before the contract conclusion and/or legal regulations and authorised interest (particularly the provision of continual company organisation, the provision of appropriate and professional representation of the company)

2.22. Work in SAP (the issue and approval of orders/ invoices)

- **Purpose of processing:** The approval of payment of invoices, entering the service orders in SAP (subsequently receive the number of the order stated by the suppliers on the invoices)
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** all subjects
- **Categories of data recipients:** no recipients
- **Preservation period:** 5 years - shredding
- **Legal base:** The fulfilment and/or negotiations before the contract conclusion and/ or entitled interest (particularly the provision of the review and the fulfilment of contracts)

2.23. Communication with the attorney offices and other partners

- **Purpose of processing:** The provision and settlement of communication/ correspondence within the set contracts, contractual negotiations, potentially resulting disputes
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** all types of subjects
- **Categories of data recipients:** There are no other recipients
- **Preservation period:** 10 years - shredding

- **Legal base:** The fulfilment and/or negotiations before the contract conclusion and/ or entitled interest (particularly the provision of continual and clear activities, cooperation)

2.24. eROZA

- **Purpose of processing:** Administration of access to customer portal ČD Cargo to agree the transport services
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** customers (clients) of the administrator
- **Categories of data recipients:** There are no other recipients
- **Preservation period:** 5 years - shredding
- **Legal base:** The fulfilment and/or negotiations before the contract conclusion

2.25. Salaries

- **Purpose of processing:** Salary payments
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** Employees of the administrator and external correspondents
- **Categories of data recipients:** There are no other recipients
- **Preservation period:** 5 years - shredding
- **Legal base:** The fulfilment and/or negotiations before the contract conclusion and/ or legal regulations (particularly within civil, commercial, and tax law)

2.26. Claims

- **Purpose of processing:** Complaint procedure
- **Categories of personal data:** Address and identification data, description data

- **Categories of data subjects:** Customers (clients) of the administrator, and other entitled persons
- **Categories of data recipients:** There are no other recipients
- **Preservation period:** 5 years, 10 years from transport contract (complaint record) – shredding, serious significance without restrictions - archive
- **Legal base:** Contract fulfilment and/ or legal regulations (particularly in the area of transport law)

2.27. Statistics

- **Purpose of processing:** Evaluation of the fulfilment of business cases
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** customers (clients) of the administrator
- **Categories of data recipients:** There are no other recipients
- **Preservation period:** without limits - archive
- **Legal base:** Entitled interest (particularly the review)

2.28. Customer centre

- **Purpose of processing:** Customer support
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** customers (clients) of the administrator
- **Categories of data recipients:** There are no other recipients
- **Preservation period:** 10 years - shredding
- **Legal base:** Entitled interest (particularly the support for the customers, the provision of flexible functioning of business interest)

2.29. Customs agenda

- **Purpose of processing:** Contractual provision of the custom agenda
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** customers (clients) of the administrator
- **Categories of data recipients:** Customs administration
- **Preservation period:** 10 years - shredding
- **Legal base:** Legal regulations (particularly in the area of customs law)

2.30. Info-line

- **Purpose of processing:** Contact location for ČD Cargo
- **Categories of personal data:** Address and identification data
- **Categories of data subjects:** all types of subjects
- **Categories of data recipients:** no recipients
- **Preservation period:** 10 years - shredding
- **Legal base:** Entitled interest (particularly the provision of simple and fast access to the company, the provision of flexible internal functioning of the company during the settlement of requests)

2.31. Tendering procedure

- **Purpose of processing:** Supplier selection
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** The suppliers
- **Categories of data recipients:** There are no other recipients

- **Preservation period:** without limits - archive
- **Legal base:** Negotiation before concluding the contract

2.32. The register of received invoices / payment notices

- **Purpose of processing:** Registry of received invoices, filing of documents in the accounting system
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** all types of subjects
- **Categories of data recipients:** E.g. inland revenues, incl. foreign
- **Preservation period:** 11 years - shredding

2.33. Processing materials for invoicing

- **Purpose of processing:** Accounting and tariff inspection
- **Categories of personal data:** Address and identification data
- **Categories of data subjects:** all types of subjects
- **Categories of data recipients:** There are no other recipients
- **Preservation period:** 11 years - shredding
- **Legal base:** Legal regulations (particularly in the area of accounting)

2.34. Invoicing

- **Purpose of processing:** Issuing invoices
- **Categories of personal data:** Address and identification data

- **Categories of data subjects:** all types of subjects
- **Categories of data recipients:** There are no other recipients
- **Preservation period:** 11 years - shredding
- **Legal base:** Legal regulations (particularly in the area of accounting)

2.35. Invoice complaint

- **Purpose of processing:** Settlement of the transport relations
- **Categories of personal data:** Address and identification data
- **Categories of data subjects:** all subjects
- **Categories of data recipients:** There are no other recipients
- **Preservation period:** 10 years – shredding, serious significance without restriction - archive
- **Legal base:** Contract fulfilment

2.36. Administration of receivables

- **Purpose of processing:** Administration of receivables, incl. enforcement
- **Categories of personal data:** Address and identification data
- **Categories of data subjects:** all subjects
- **Categories of data recipients:** no recipients
- **Preservation period:** 10 years - shredding
- **Legal base:** Legal regulations (particularly in the area of accounting), entitled interest (particularly the enforcement of legal entitlements)

2.37. Cargo cash registry (CNP)

- **Purpose of processing:** Particularly the processing of transport costs, the fulfilment of transport contract, the accounting of cargo fee (based on the cargo sheet, wagon sheet, etc.)
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** customers (clients) of the administrator
- **Categories of data recipients:** Other transport providers
- **Preservation period:** 5 years - shredding
- **Legal base:** Contract fulfilment

2.38. Test registry

- **Purpose of processing:** administration of operation documentation
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** Employees of the administrator and the partners
- **Categories of data recipients:** no recipients
- **Preservation period:** 5 years - selection
- **Legal base:** Legal regulations (particularly in the area of labour and transport law), contract fulfilment

2.39. Train documentation

- **Purpose of processing:** Train documentation processing
- **Categories of personal data:** Address and identification data
- **Categories of data subjects:** Employees of the administrator and the partners
- **Categories of data recipients:** Transport partners

- **Preservation period:** 5 years - shredding

2.40. Communication with transport providers

- **Purpose of processing:** Transport order (loading application forms), wagon manager
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** customers (clients) of the administrator
- **Categories of data recipients:** Transport providers
- **Preservation period:** 5 years - shredding
- **Legal base:** legal regulations (particularly in the area of transport law), the fulfilment of contract and/or negotiation before the contract conclusion

2.41. Central siding train agenda (CVA)

- **Purpose of processing:** Registry of wagons, materials for invoicing of charges from the siding trains
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** Employees of the administrator and customers
- **Categories of data recipients:** There are no other recipients
- **Preservation period:** 5 years - shredding
- **Legal base:** The fulfilment and/or negotiations before the contract conclusion

2.42. Exceptional circumstances

- **Purpose of processing:** Investigation of extraordinary events
- **Categories of personal data:** Address and identification data, description data

- **Categories of data subjects:** Employees of the administrator, affected physical persons
- **Categories of data recipients:** All participating parties at the exceptional event
- **Preservation period:** without limits - archive
- **Legal base:** Legal regulations (particularly in the area of transport law)

2.43. Orders of the train

- **Purpose of processing:** The provision of train route
- **Categories of personal data:** Address and identification data, description data
- **Categories of data subjects:** customers (clients) of the administrator
- **Categories of data recipients:** According to concluded contracts
- **Preservation period:** 5 years - shredding
- **Legal base:** Contract fulfilment

3. SPECIFICATION OF APPLIED TERMS

The information on personal data processing includes the terms with the meaning below.

4. „**Data subject**“ physical entity with personal data processed by ČD Cargo.
 - 4.1. „**Purpose of processing**“ reason for personal data processing by ČD Cargo.
 - 4.2. „**Personal data category**“ the categories of personal data include:
 - 3.3.1. address and identification (e.g. the name, surname, date and place of birth, birth number, address, etc.),
 - 3.3.2. description data (e.g. education, title, employer, bank details, insurance company, etc.),
 - 3.3.3. data on other persons (e.g. address and identification data of spouse, partner, child),
 - 3.3.4. sensitive data (e.g. data on racial or ethnic origin, political view, religion, sexual orientation, genetic data, biometric data, etc.).
 - 4.3. „**Data subject categories**“ the categories of data subjects include:
 - 3.4.1. customers (clients) of ČD Cargo,
 - 3.4.2. members of selected administration bodies,
 - 3.4.3. employees of the administrator,
 - 3.4.4. persons with another relation to the administrator, e.g. transport partners, external persons, transport providers, students, etc.
 - 3.4.5. all types of subjects, i.e. all subjects defined under 3.4.1. – 3.4.4. of this point
 - 4.4. „**Categories of data recipients**“ categories of physical and legal entities, bodies of public authorities, agencies and other subjects, who receive personal data.

The categories of recipients, except for the above defined categories, for individual agendas belong to the companies administrating the information systems which ČD Cargo uses, and companies from ČD group.
 - 4.5. „**Preservation period**“ the period the personal data is stored or criteria used for the period specification. ČD Cargo has processed internal standard to define the detailed rules for handling, filing, and shredding the documents.
 - 4.6. „**Legal base**“ defines the legal aspects for personal data processing.
 - 4.7. „**Employee**“ a person who is or was in law-labour relation ČD Cargo.