

Information on the Processing of Personal Data of Customers, Business Partners, Job Applicants, and Other External Persons of ČEZ, a. s.

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1. Information about the Data Controller and Data Protection Officer

Dear customers, business partners, visitors, users of information systems or applications, **ČEZ, a. s.**, reg. No.: 45274649, having its registered office at Duhová 2/1444, Prague 4, zip code 140 53, registered in the Commercial Register kept by the Municipal Court in Prague under file No. B 1581, **as the personal data controller** (hereinafter referred to as "our company"), **hereby informs you about the principles and procedures for processing your personal data** and about your rights related to the protection of personal data, in accordance with Act No. 110/2019 Coll., on the processing of personal data, as amended (hereinafter referred to as "PDPA") and Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation; hereinafter referred to as the "GDPR").

Together with other companies, our company is also a member of **CEZ Group**, which is headed by a controlling entity within the meaning of Section 79 of Act No. 90/2012 Coll., on business corporations and cooperatives, as amended (hereinafter referred to as the "BCA"). Therefore, the principles and procedures for processing and protecting personal data, their security, and the exercise of your rights as data subjects, including the appointment of a data protection officer, are set uniformly for the entire CEZ Group.

Mgr. Petr Brázda, LL.M., was appointed as the Personal Data Protection Officer for CEZ Group companies.

The information provided herein is of a general legally normative nature and is therefore not part of any contracts and may be supplemented by case-specific details in our communications.

2. Personal Data We Process

In accordance with the relevant legal grounds and purpose of processing, our company and its contractual processors particularly process the following categories of personal data:

- a) Identification, authentication and address data: first name, last name, academic degree, date of birth, data from identity documents, permanent or temporary residence address, delivery or other contact address, nationality, place and country of birth, registered office, registration number, in rare cases birth certificate number, handwritten signature and electronic signature;
- b) contact details: telephone number, email address, data box ID;
- c) electronic data: IP address, cookies, authentication and e-signature certificates, location data of the device used by the user, identifiers in social networks and communication platforms;
- d) other personal data related to the contractual relationship: bank account number, customer account number, customer bill payments (SIPO) connection number, card access ID number (if assigned to you), access ID, and password to the user's personal account (if created);
- g) in specific cases, personal data of special categories;
- i) personal data in a sound recording – audio recordings;
- j) personal data in an image recording – camera recordings, photographs, videos.

3. Personal Data Sources

Our company primarily obtains your personal data directly from you, in particular within the scope of negotiations for the conclusion of a contract and in the course of its performance, or from third parties who mediate such negotiations. In these cases, we will inform you when the provision of personal data is necessary for the performance of a specific service or business cooperation, and when it is voluntary, but serves to facilitate mutual communication and streamline cooperation between you and our company.

We also generate other personal data about you, which are mainly data on consumption and consumer behavior (in the case of the supply of commodities such as electricity, etc.).

Furthermore, we may obtain your personal data from public records or government authorities (for example, the trade register, the land register, the insolvency register, or the central restraint register, etc.). Alternatively, in specific cases, we can also get your personal data from non-public records on the basis of applicable legislation.

In order to improve the quality, objectivity, verifiability, security of services and protection of rights, our company will monitor and record communications with you (for example, phone calls with customers). In such cases, we will always inform you in advance, and you will have the right to refuse this procedure. The only exceptions to this are special communication lines dedicated exclusively to crisis and emergency situations, which are always recorded.

In order to ensure the protection of property, personal safety, and the security of the services provided, our company has camera systems located on buildings owned or managed by our company or one of the CEZ Group companies. You will always be informed about the use of CCTV systems by means of information signs placed on the buildings in question. If necessary, the obtained camera recordings may be provided to administrative and law enforcement authorities.

4. Purposes, Legal Grounds, and Duration of Personal Data Processing

We process your personal data mainly for the purposes listed below, on the basis of specified legal grounds and for the defined period of time.

The legal grounds for processing personal data of the data subject under the GDPR may be:

- consent to personal data processing for one or more specific purposes;
- the processing is necessary for the performance of a contract to which the data subject is a party, or for the performance of pre-contractual measures adopted at the request of the data subject;
- the processing is necessary for compliance with a legal obligation to which the controller is subject;
- the processing is necessary to protect 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 controller;
- the processing is necessary for legitimate interests of the controller or a third party, except where those interests are overridden by the interests or fundamental rights and freedoms of the data subject requiring the protection of personal data, in particular where the data subject is a child.

An overview of the specific purposes, legal grounds, and periods for which personal data will be stored is provided in the attached table:

PURPOSE OF PD PROCESSING	LEGAL SCOPE	RETENTION PERIOD
Verifying the compliance of contractors and job applicants	C – Legal obligation F – Legitimate interest of the controller	Up to 5 years
Electro-mobility	B – Contracts C – Legal obligation	11 years
Registration of business partners for purchase and sales contracts for materials, services, and investments	B – Contracts F – Legitimate interest of the controller	Up to 1 year after termination of the contract and expiry of the shredding period for the particular type of document.
Records of persons provided with accommodation in connection with the armed conflict in Ukraine	B – Contracts C – Legal obligation	4 years
Records of legal disputes within CEZ Group	F – Legitimate interest of the controller	Up to 1 year from the end of the legal dispute
Records of customers purchasing heat from CEZ Group's generating facilities and performance of obligations related to the supply of thermal energy	B – Contracts	Up to 11 years after termination of the contractual relationship
Corporate volunteering	B – Contracts	5 years
Physical protection	C – Legal obligation	For the duration of the employment contract or contractual relationship with the supplier
Camera systems	C – Legal obligation F – Legitimate interest of the controller	7 days
Qualification and evaluation of contractors in the nuclear energy division	C – Legal obligation F – Legitimate interest of the controller	For the lifetime of the nuclear facility
Marketing research	B – Contracts F – Legitimate interest of the controller	1 year
Marketing research and competitions (Public Relations)	B – Contracts C – Legal obligation F – Legitimate interest of the controller	Up to 1 year
Recruitment	A – Consent B – Contracts F – Legitimate interest of the controller	For the duration of consent or up to 11 years
Recordings of calls to the Integrated Security Operations Center's telephone line	F – Legitimate interest of the controller	6 months

PURPOSE OF PD PROCESSING	LEGAL SCOPE	RETENTION PERIOD
Recording of telephone calls and audio communications at nuclear power plant sites with a view to meeting the safety requirements of the nuclear facility	C – Legal obligation	1 year
Production-related procurement	B – Contracts	Up to 1 year after termination of the contract and expiry of the shredding period for the particular type of document
Commodity trading and compliance with obligations arising from related legislation	B – Contracts C – Legal obligation	Up to 11 years
Protection of information of relevant CEZ Group companies / Searching for and analysis/evaluation of data in connected systems	C – Legal obligation F – Legitimate interest of the controller	Up to 1 year
Protection of personal data	C – Legal obligation	Up to 11 years
Protection of classified information and security capability	C – Legal obligation	10 years
Personal data processed during epidemics and other humanitarian emergencies	C – Legal obligation D – Necessity for the protection of vital interests E – Necessity in the public interest F – Legitimate interest of the controller	For the duration of emergency preventive (protection) measures and for the time necessary for their evaluation
Verification of mental/personal competences/ qualifications	C – Legal obligation F – Legitimate interest of the controller	In order to comply with our legal obligations, we retain personal data for the entire life cycle of nuclear facilities and for 10 years after their decommissioning. In other cases we retain personal data for up to 5 years.
Provision of the Data Protection Officer service	B – Contracts C – Legal obligation	5 years
Postal and filing service	F – Legitimate interest of the controller	The retention period depends on the shredding period of the document concerned.
Obligations of the issuer, in particular the maintenance of a list of persons with access to internal information	C – Legal obligation	11 years
Radiation protection	C – Legal obligation	30 years
Implementation of information security and cyber security	B – Contracts C – Legal obligation F – Legitimate interest of the controller	Up to 11 years
Contractual documentation for funding	B – Contracts	5 years
Investigation of information security incidents within CEZ Group	C – Legal obligation F – Legitimate interest of the controller	5 years
Investigation of customer complaints from CEZ Group companies by the ČEZ Ombudsman	B – Contracts	5 years
Conclusion of transactions on financial markets – recorded conversation	B – Contracts F – Legitimate interest of the controller	6 months
Keeping records of the qualifications of employees, members of company bodies, and employees of suppliers (Nuclear energy)	B – Contracts C – Legal obligation F – Legitimate interest of the controller	45 years
Keeping records of occupational accidents	C – Legal obligation	45 years
Issuing authorizations to carry out inspections of selected equipment in accordance with Decree No. 358/2016 Coll.	B – Contracts C – Legal obligation	4 years after termination of employment or the contractual relationship
Extracts of shareholders entries from the statutory register of the Central Securities Depository for the purpose of dividend payment and holding the AGM	C – Legal obligation	11 years
Security of protected information of the relevant CEZ Group companies – certificates	C – Legal obligation F – Legitimate interest of the controller	1 year after termination of employment
Ensuring physical protection at nuclear power plants, in particular camera recordings, audio recordings, and identification cards	C – Legal obligation F – Legitimate interest of the controller	Up to 11 years
Ensuring the holding and conduct of the AGM of ČEZ, a. s.	C – Legal obligation F – Legitimate interest of the controller	For the duration of the existence of ČEZ, a. s.
Ensuring access to information and business resources	B – Contracts	11 years
Processing of cookies on websites	A – Consent C – Legal obligation F – Legitimate interest of the controller	Processed on the user's device according to the type of cookies.

5. Processors and Recipients of Personal Data

In order to ensure the efficiency and professionalism of the processes, our company may, in justified cases, disclose your personal data to its employees, to contractual partners in the capacity of personal data processors on the basis of a contract for personal data processing, or to contractual partners in the capacity of joint controllers of personal data on the basis of a contract on mutual rights and obligations of joint controllers, or to another personal data controller in the capacity of a personal data recipient.

We process your personal data both manually and by automated means; however, we do not use automated decision-making that could affect your rights in the automated processing of your data.

The protection of your personal data is important to us and is therefore ensured in a uniform manner for the entire CEZ Group in accordance with the relevant legislation. We also require a comparable level of organizational and technical measures for the security of your personal data from our contractual partners who process personal data for us.

PERSONAL DATA PROCESSORS

Only vetted processors or sub-processors may process personal data for us, and may do so exclusively on the basis of a contract for personal data processing or on the basis of another legal act, which must guarantee comparable organizational and technical security of personal data as is set up in CEZ Group.

If vetted processors or sub-processors are involved in personal data processing, they shall be obliged to use the personal data in question exclusively for the purposes for which they have been transferred to them, and they shall be prohibited from transferring such personal data to other entities without the consent of our company, as the data controller.

PROCESSOR CATEGORIES	ACTIVITY
Security agencies	External security agencies providing protection of life, health, and property.
Other CEZ Group companies	ČEZ, a. s., is the parent company of CEZ Group; to ensure quality services, it also cooperates with its subsidiaries, which are listed in more detail at www.cez.cz .
Corporate volunteering	Implementation of corporate volunteering aimed at helping individuals and specific projects.
Marketing and communication	Ensuring communication with the public, including the implementation of promotional events, communication materials, and marketing research.
Personnel agencies	Providing recruitment and selection of suitable job candidates.
IT service providers and software suppliers	Development and maintenance of relevant IT systems, websites, systems for holding general meetings electronically, management, and operating electric vehicles, etc.
Providers of postal and courier services	A company providing postal services according to the Postal Services Act (Czech Post), including the delivery of remittances, as well as the transport of postal items and courier services.
Providers of legal services and consultancy	Provision of legal services and consultancy.
Authorized entities	A legal entity or individual who is authorized under a power of attorney or a contract to act and perform legal acts on behalf of the principal, which in this case is ČEZ, a. s.

PERSONAL DATA RECIPIENTS

Your personal data may also be transferred to third parties who are entitled to receive such personal data. These include, for example, tax, administrative, or regulatory authorities.

In particular, our company transfers personal data to the following recipients:

- Czech National Bank
- Energy Regulatory Office
- State Office for Nuclear Safety
- Labor Office of the Czech Republic

6. Transfer of Personal Data to Third Countries

Our company processes your personal data, either directly or through its processors, primarily in the Czech Republic or the European Union ("EU"), where the same conditions of protection and security of personal data processing are in force and effective throughout the European Union or the European Economic Area ("EEA") under the GDPR.

In exceptional cases, personal data is transferred to third countries or international organizations. In such cases, before transferring personal data, we assess whether the selected controller or processor provides appropriate safeguards and conditions, including the enforceability of your rights as a data subject, while assessing the effective legal protection of personal data in that country. Your personal data may therefore only be transferred to third countries or international organizations if the following conditions are met:

- a decision of the European Commission exists in respect of the selected third country/international organization, where it has been found that the third country / international organization ensures an adequate level of data protection;
- the selected processor or sub-processor is able to provide appropriate organizational and technical safeguards and there is enforceability of data subjects' rights and effective legal protection of data subjects in the country of the processor or sub-processor.

SUITABLE SAFEGUARDS MAY BE:

- a) legally binding and enforceable instruments between public authorities or public bodies;
- b) binding corporate rules;
- c) standard data protection clauses adopted by the European Commission;
- d) standard data protection clauses adopted by the relevant supervisory authority and approved by the European Commission;
- e) an approved code of conduct with binding and enforceable obligations for the processor in the third country to apply appropriate safeguards, taking into account the rights of data subjects;
- f) an approved certification mechanism with binding and enforceable obligations for the processor in the third country to apply appropriate safeguards, taking into account the rights of data subjects.

7. Cookies and Other Digital Processing

We use cookies on our company's website. In order to display our website correctly, we need to collect technical cookies. For all other types of cookies, we need your consent; it is up to you whether you give us your consent, and in some cases to what extent. You may set the extent of your permission to collect cookies using a "cookie bot", which is displayed on the relevant website. Here, you can also find detailed information on cookies.

Depending on whether and to what extent you give us your consent, we may then use cookies to personalize content and advertisements, provide social media features, and analyze traffic on our company's website. We may then share information about how you use our website with our social media, advertising, and analytics partners. Our partners may combine these data with other information which you have provided to them or which they have obtained in connection with your use of their services. For cookies, we use the services of Google Inc., which is based outside the EU in the USA.

Detailed information about cookies is available [in the Website Information](#).

8. Your Data Protection Rights

Our company strives for transparency and fair processing of your personal data and to ensure their proper protection, always in compliance with applicable laws and regulations. To assure you of our responsible approach to the processing of your data, we are ready to respond quickly and professionally to your legitimate requests to verify that we process your data responsibly and, where appropriate, to help us rectify any shortcomings in this activity, should they exceptionally occur.

- If personal data processing is based on your consent, you shall be entitled to withdraw your consent to future processing at any time.
- You shall be entitled to request access to your personal data and more detailed information about its processing from us as the data controller.
- You shall be entitled to request that we rectify inaccurate or incomplete personal data.
- You shall be entitled to request that we provide your personal data in a commonly used and machine-readable format that enables it to be transmitted to another controller, provided that we have obtained it on the basis of your consent or in connection with the conclusion and performance of a contract and it is processed by automated means.
- You shall be entitled to object to the processing of some or all of your personal data.
- You shall be entitled to request that we erase your personal data if we no longer have any legal grounds for further processing.
- You shall be entitled to file a complaint with the Office for Personal Data Protection.

Detailed information regarding your rights, including how to exercise your rights in the case of data protection, is available [here](#).

9. Glossary of Terms and Abbreviations

Cookies	Short text files that a visited website sends to your browser. They allow the website to record information about your visit, for instance, preferred language and other settings. The next visit to the website may therefore be easier and more productive. Cookie files are important. Web browsing would be much more complicated without them.
Supervisory Authority	The supervisory authority in the Czech Republic has been established under the Personal Data Protection Act as the Office for Personal Data Protection (hereinafter referred to as the "OPDP"). It is entrusted with the competences of a central administrative authority for personal data protection within the scope laid down in the act, and with other competences laid down in a special regulation.
CEZ Group	Together with other companies, our company is a member of CEZ Group, which is headed by a controlling entity within the meaning of Section 79 of Act No. 90/2012 Coll., on business corporations and cooperatives, as amended (hereinafter referred to as the "BCA"). The principles and procedures for processing and protecting personal data, their security, and the exercise of your rights as data subjects, including the appointment of a data protection officer, are set uniformly for the entire CEZ Group.
GDPR	Regulation (EU) No. 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
Personal data (hereinafter referred to as "PD")	Any information relating to an identified or identifiable individual; an identifiable individual is one who can be identified, directly or indirectly, particularly by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that individual.
Data Protection Officer	A person appointed for the entire CEZ Group pursuant to Article 37 of the GDPR. The Data Protection Officer (hereinafter also referred to as the "DPO") has independent responsibility for a defined area of personal data protection for the CEZ Group and is a partner for negotiations with the OPDP and data subjects. In particular, the DPO is responsible for protecting the interests of data subjects.
Recipient	An individual or legal entity, public authority, agency, or other body to which personal data are disclosed, whether a third party or not. The recipient has the legal, contractual, or other authority to process personal data. This includes other controllers or processors such as tax, administrative or regulatory authorities. However, public authorities that may receive personal data within the scope of a particular inquiry in accordance with Member State law are not regarded as recipients; the processing of such data by such public authorities must be in compliance with the applicable data protection rules for processing purposes.

CEZ Group	CEZ Group comprises several companies grouped around the parent company ČEZ, a. s., operating mainly in the energy sector, linked to the parent company mainly through equity holdings. More detailed information here.
Personal data controller	The legal entity (ČEZ, a. s.) that determines the purpose and means of processing personal data, carries out the processing, and is responsible for it. The controller may authorize or delegate a processor to process personal data.
Data subject (hereinafter referred to as the "DS")	An individual to whom personal data relate. The data subject shall be deemed to be identified or identifiable if his or her identity can be directly or indirectly established on the basis of one or more PD elements.
Proportionality test	The controller's assessment of a data subject's request, where the data subject's request is manifestly unfounded or unreasonable, in particular because it is repetitive. Requests may be considered manifestly unfounded if, for example, they are completely lacking in justification at first glance (where justification is necessary) and it is not possible to assess them, even by interpreting what the data subject is requesting (an example would be an objection to processing under Article 21(1) of the GDPR where the DS fails to provide information in the request about his or her situation that enables the controller to assess whether the legitimate interest outweighs the interest of the data subject). Requests may especially be considered evidently unreasonable if they are repeated without a reason or if they are too numerous. This must, however, be assessed on a case-by-case basis. Evident lack of justification or inappropriateness of a request shall be demonstrated by the controller and justified in a communication by which the data subject and the Data Protection Officer are informed about the rejection of the request. This justification must be documented by the controller and filed for the purposes of inspection by the Supervisory Authority.
PDPA	Act No. 110/2019 Sb., on Personal Data Processing and on Amendments to Certain Acts, as amended
Personal data processing	Any operation or set of operations with personal data or sets of personal data that is performed, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
Personal data processor	An individual or legal entity, public authority, agency, or other body that processes personal data for the controller.
Special data categories (sensitive data)	Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, or data concerning a natural person's sex life or sexual orientation.

10. Contact Us

If you have a request or complaint relating to the processing of your personal data or a query for the person responsible for processing of personal data our company, please, contact us via our [web form](#). Alternatively, you can write to us at ČEZ, a. s., Duhová 2/1444, 140 53 Prague 4, using the subject line "Personal Data Processing". We will respond to your requests, questions, or grievances as soon as possible, but no later than one month after receipt. If we are unable to deal with your request in a timely manner due to the complexity of your request or a high number of requests from other persons, we will inform you of the necessary time extension.

Our Data Protection Officer is Mgr. Petr Brázda, LL.M. You may contact him via the web form or in writing at the address **Personal Data Protection Officer, ČEZ, a. s., Duhová 2/1444, 140 53, Prague 4** or via the data box ID: **yqkcds6**. Details on ways to contact the data protection officer, their mission, and competence in dealing with your rights are available on the [Data Protection Officer website](#).

11. Effect

This document is effective from the date of publication on May 25, 2018. The text was last updated on July 28, 2022.