

Memorandum on the processing of personal data for employees, members of bodies and members of the association (hereinafter referred to as the "Memorandum")

Introduction

Dear employees, members of the authorities, members of the association,

With this memorandum, we would like to inform you as **data subjects** about the principles and procedures for processing your personal data and your rights related to the processing of such data, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 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 "**GDPR**") and Act No. 110/2019 Coll., on the processing of personal data, as amended (hereinafter referred to as "**PDPA**").

EP Kids, z.s. respects the transparent and fair processing of your personal data and ensuring that it is properly protected in accordance with applicable legislation to ensure fair and fair processing. We protect your personal data with the highest security to prevent any unauthorized or accidental access to your personal data, destruction, loss, unauthorized transfers, unauthorized processing. To this end, we follow appropriate technical and organizational measures to ensure a level of security appropriate to all possible risks. Persons who come into contact with personal data are obliged to maintain the confidentiality of information obtained in connection with the processing of such data.

In view of the fact that this Memorandum refers to terms in the field of personal data protection and at the same time uses abbreviations, we attach in the section entitled **List of selected terms and abbreviations of** this Memorandum an explanation of the terms and abbreviations used in order to provide you with the content of this text in an even clearer form.

In addition to the information provided in this Memorandum, we will make the details of the processing of your personal data available to you in the relevant internal regulations of the controller.

Controller

The controller of your personal data is the association **EP Kids, z.s.**, ID No. 27018997, with registered office at Pařížská 130/26, Josefov, 110 00 Prague 1, registered in the Federal Register under No. L 16293/MSPH, with which you have an employment relationship (or other similar relationship) or you are a member of the administrator or a member of the association (hereinafter referred to as the "**controller**") and which is responsible for fulfilling its obligations under the applicable data protection legislation.

List of selected terms and abbreviations

TERM ABBREVIATION	AND	MEANING
Personal data		Any information about an identified or identifiable natural person; an identifiable natural person is a natural person who can be identified, directly or indirectly , in particular by reference to an identifier such as a name, an identification number, location data, a network identifier or to one or more specific elements of the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
Special categories of 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 and data concerning the health or sex life or sexual orientation of a natural person.
Data subject		The natural person to whom the personal data relates. A data subject shall be deemed to be identified or identifiable if his or her identity can be established, directly or indirectly, on the basis of one or more personal data.
Controller		The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
Processing		Any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated processes, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or any other disclosure, alignment or combination, restriction, erasure or destruction.
Purpose of processing		Purpose of the controller's activity and its purpose

Means of processing	The tools and procedures chosen for the specific processing of personal data.
Legal title	The legal title, or legal ground, is a condition without which the processing of personal data is in any case not possible.
Processor	A natural or legal person, public authority, agency or other body that processes personal data for the controller.
Recipient	The natural or legal person, public authority, agency or other body to whom the personal data are disclosed, whether or not it is a third party. The recipient has the legal, contractual or other authority to process the personal data. This includes other controllers or processors such as tax, administrative or regulatory authorities. However, public authorities which may obtain personal data in the context of a specific investigation in accordance with the law of a Member State are not considered recipients; the processing of such personal data by those public authorities must comply with the applicable data protection rules for the purposes of the processing.
Third party	A natural or legal person, public authority, agency or other body which is not a data subject, controller, processor or person directly under the control of a controller or processor who is authorised to process personal data.
DPO	The supervisory authority under the DPA is the Office for Personal Data Protection . It is entrusted with the competences of the central administrative authority in the field of personal data protection to the extent provided for in the ZZOU and other competences provided for by a special legal regulation.
Cookies	Small text files that enable the website to remember important information that will make it easier for the user to continue using it. The controller informs you about the use of cookies. More information can be found on the administrator's website.

Personal data processed

The controller and the processor who processes personal data for the controller process, in relation to the relevant legal ground or legal title and purpose of processing, in particular the following categories of personal data:

- **identification, authentication and address data:** name, surname, title, date of birth, data from identity documents, address of permanent or temporary residence, delivery or other contact address, nationality, place and country of birth, birth number, handwritten signature and electronic signature;
- **contact details:** telephone number, e-mail address, mailbox ID;
- **electronic data:** IP address, authentication certificates, electronic signature certificates;
- **personal data related to the employment (other similar) relationship:** bank account number, salary data, education, criminal matters, identification data for children, family members, knowledge of foreign languages, personal number;
- **personal data related to membership in the association, performance of functions in the association;**
- **in specific cases, special categories of personal data.**

For an overview of the personal data processed by the controller, please refer to the relevant internal regulations of the controller.

Source of personal data processed

The controller obtains your personal data **primarily from you** when negotiating and performing an employment or service contract or in connection with an application for membership of the association. In addition, the controller obtains your personal data **from publicly available sources** (e.g. the commercial and trade register) or **from public authorities**.

Purpose and duration of the processing of personal data

The controller processes your personal data in particular for the following purposes, based on the relevant legal title.

The answer to the question of how long **the controller is entitled to process your personal data** depends on the purpose of the processing (for example, payroll or accounting records of data necessary for pension insurance purposes are archived by the controller for 30 years, if it is payroll or accounting records of data necessary for pension insurance purposes kept for pension beneficiaries, then for 10 years).

Demonstrative list of processing purposes:

- Processing of employees' personal data in connection with the personnel agenda;
- processing of employees' personal data in connection with payroll;
- processing of personal data in connection with the provision of occupational health examinations;

- processing of personal data in connection with the provision of security premises (CCTV, alarm system, entry and exit from the monitored area);
- processing of personal data of members of bodies for entry in public registers;
- processing of personal data in connection with membership of the association and the related agenda (in particular, processing of applications for membership of the association, keeping a list of members, minutes of membership meetings)
- processing of personal data in connection with the archiving of documents;
- processing of personal data in connection with the enforcement of claims by the controller.

An overview of the purposes of the processing of personal data and the periods for which personal data are processed can be found in the relevant internal regulations of the controller.

Legal title of the processing of personal data

The GDPR distinguishes a total of **six types of** legal titles for processing personal data in Article 6, with **the four legal titles listed below being the most relevant** for controllers. The controller processes your personal data:

- for the **performance of a contract**;
- the processing is necessary for the **fulfilment of a legal obligation** to which the controller is subject (for example, processing of personal data in connection with the processing of documents for statutory health and social security contributions);
- the processing is necessary for the purposes of **the legitimate interests of the controller or third party concerned**, 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;
- on the basis of your **consent**, provided that no other legal title can be used for the processing of personal data.

No contract can be concluded without the provision of the personal data necessary for the performance of the contract and the fulfilment of legal obligations. It is possible to object to the processing of personal data for the purposes of legitimate interests. You have the right to withdraw your consent at any time. In doing so, the controller points out that the withdrawal of consent does not affect the lawfulness of processing based on consent given prior to its withdrawal.

For an overview of the legal provisions relating to the processing of personal data to comply with the legal obligation, please refer to the relevant internal regulations of the controller.

Method and means of processing

The controller and the processor who processes personal data for the controller process your personal data, **manually** (for example, by setting up a contract in paper form in the relevant file) and **automatically** (by ICT means, for example, using a personal computer in Microsoft Office 365 programs and in the system of the controller or processor, as the case may be).

In the case of automated processing of your personal data, the controller **does not use automated decision-making, including profiling, which** could affect your rights.

Camera system

The administrator hereby informs you that the premises **Jankovcova 1566, Holešovice Prague 7** operates a camera system with recording, in order to protect the property, life and health of persons moving in the monitored area using the camera system, and also for the purpose of obtaining evidence for the Police of the Czech Republic, resolving insurance claims.

The recording from the camera system is kept for 14 days, after which it is automatically deleted. The legal basis for the processing of personal data according to Article 6(1)(f) GDPR is the so-called legitimate interest of the controller. These are 2 static cameras located at the entrance without audio recording.

The controller obtains your personal data **via the controller's camera system**. The controller processes, in relation to the relevant legal ground or legal title and purpose, the **image recording of the data subject, image and visual information about the behaviour and actions of the recorded persons, information about the time of recording**. The controller processes your personal data **automatically via Synology surveillance station (CCTV)**. In the case of automated processing of your personal data, the controller **does not use automated decision-making, including profiling, which** could affect your rights.

The controller also operates an **online** camera capturing the main entrance area of the controller's premises, for the online camera personal data is not transferred to other recipients. The purpose of the processing is to protect the property, life and health of persons entering the controller's premises. The right of access to personal data (Art. 15 GDPR), the right to rectification of personal data (Art. 16 GDPR), the right to erasure of personal data (Art. 17 GDPR) and the right to data portability (Art. 20 GDPR) do not apply.

Information signs inform about the use of CCTV systems.

The camera system is operated for the controller by **EP Investment Advisors, s.r.o.**, company registration number 26687259, with registered office at Pařížská 130/26, Prague 1 - Josefov, Postal Code 110 00, registered in the Commercial Register under No. C 87354/MSPH, data box 89pegn **as the processor**. The online camera is operated by the administrator.

Processor

The Controller processes your personal data by its employees who need access to the personal data for the performance of their work duties and who are bound to maintain confidentiality of all facts and data of which they become aware in the course of their work.

In addition, employees of **the processor** have access to your personal data only to the extent necessary for the performance of their activities for the controller. We always enter into a written **data processing agreement** with all our processors, which includes safeguards for the security of your personal data. These include, for example, a company providing payroll processing activities for the controller, or an IT service provider and software supplier providing programming or other technical support services.

For an overview of the processors for the controller, please refer to the relevant internal rules of the controller.

Recipients of personal data

Under certain circumstances, the controller may transfer your personal data to so-called recipients (other controller, processor) and third parties.

These **recipients** are, for example, public authorities to whom personal data of employees are normally transferred for the purpose of keeping tax records or calculating social security or health insurance:

- Czech Social Security Administration,
- health insurance companies,
- financial and, where applicable, enforcement authorities in connection with the employer's normal reporting and tax obligations.

However, it is not a recipient if the public authorities require personal data in the context of a special investigation, in which case it is a so-called **third party**.

Transfers of personal data to third countries

The controller, or the processor for the controller, processes your personal data primarily in the Czech Republic or, where applicable, in the European Union ("EU"), where unified protection of personal data is guaranteed in each member state. Quite exceptionally, your personal data may be processed outside the EU, for example in a computer system whose servers will be located outside the EU. In such a case, we would choose as a contractual partner a company that will meet the conditions for secure data transfer in accordance with the applicable legislation. We will inform you in an appropriate manner about the specific measures and procedures, to whom and to which countries personal data is disclosed/transferred, under which conditions, how its data is protected, or the risks involved.

Rights of the data subject

- If the processing of personal data is based on your consent, you have the right **to withdraw** your consent **at any time**. In connection with the withdrawal of consent, the controller informs you that **the withdrawal of consent does not affect the lawfulness of the processing of personal data until the moment of its withdrawal**, nor does it affect the processing of data for other legal reasons for which your consent is not required.
- You have the right to request **access to** your personal data and more detailed information about its processing.
- You have the right to request the **rectification of** inaccurate or incomplete personal data.

- You have the right to request the **provision** of your personal data in a commonly used and machine-readable format that allows it to be transmitted to another controller, where 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 have the right to object **to** the processing of some or all of your personal data.
- You have the right to ask us to **delete** your personal data if we no longer have any legal basis for further processing.
- You have the right to lodge a **complaint with** the Data Protection Authority.
- You have the right **not to be subject to** automated individual decision-making, including profiling.

Possible update of the memorandum

In view of the fact that there may be changes to the rules and conditions for processing and protecting your personal data, in particular as a result of changes to legislation, or changes to our terms, conditions, procedures and methods for processing and protecting your personal data, we will inform you of such changes by updating this Memorandum, unless such changes require us to contact you directly.

This memorandum was last updated on 13 May 2025.

Exercise of data subject rights

In the event of a **request** by you to exercise a right as listed in the section entitled **Data Subject Rights** of this Memorandum, the controller shall always be **obliged** to deal with such a request from the data subject and shall provide the information without undue delay after receipt of the request, but in any event **within one month of receipt of the request**. This period **may be** extended by two months in **exceptional cases**, which must be notified to the data subject by the controller, including the reasons for such extension.

You may send your request to the contact details of the controller:

EP Kids, z.s., Pařížská 130/26, Josefov, 110 00 Prague 1.

or email milena.segecova@epholding.cz

+420 703 401 493.

To facilitate the exercise of your rights, you can use the sample form marked **Data Subject Request**.

In the event that you have a **reasonable suspicion** that there has been a violation of legal regulations in connection with the protection of Personal Data, **you have the right to file a complaint with the Office for Personal Data Protection, Pplk. Sochora 727/27, 170 00 Prague 7- Holešovice, email: stiznosti@uoou.cz**, for this purpose you can use the form available on the website of the Office for Personal Data Protection <https://uoou.gov.cz/verejnost/stiznost-na-spravce-nebo-zpracovatele>.