

## **Information concerning the processing of personal data of employees**

### **Introductory information**

The company PEKM Kabeltechnik s.r.o. as the employer processes personal data of its **employees** based on and in accordance with the relevant legal regulations, particularly with the 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), (further also only as the “**Regulation**”), the processing is carried out for specified purposes, using the methods and means of processing which are always in compliance with the respective legal title within the meaning of article 6 of the Regulation.

This information concerning the processing of personal data of jobseekers contains transparent information within the meaning of articles 13 and 14 of the Regulation, as well as information concerning data subject rights within the meaning of articles 15 through to 22 of the Regulation.

### **Personal data controller**

In relation to the data of its employees, the company **PEKM Kabeltechnik s.r.o.**, with its registered office at Stráž nad Nisou, Svárovská 698, zip code 463 03, company ID: 430 01 378, acts in the legal position of the personal data controller (further only as the “**Controller**”).

The Controller is responsible for processing the personal data of the data subjects (employees) and it has adopted internal measures in this respect to secure and protect the personal data being processed, which are specified in the internal documentation of the Controller, in the Guideline S2-07 Personal Data Processing and Protection.

The employees of the company PEKM Kabeltechnik s.r.o. are entitled to contact the employer as the Controller with all their enquiries concerning the processing and protection of personal data and exercise their rights of the data subject with the Controller, either personally at the personal data contact points established at the personal department of the Controller, or at the e-mail address: info.pekm@cvgrp.com, or phone no.: +420 485 248 111.

### **Data processors**

In order to ensure further processing of personal data, the Controller has contracted the Processors specified in F2-07-01, which is saved on the company server or it can be viewed upon request to the immediate superior, or at the personal data contact point - see above.

### **Transfer of personal data**

Partial transfer of selected personal data of the mother company within the multinational CVG Group takes place based on the FRAMEWORK AGREEMENT IN RELATION TO DATA TRANSFERS WITHIN THE COMMERCIAL VEHICLE GROUP, INC. GROUP of 24 May 2018 (further only as “CVG GROUP FRAMEWORK AGREEMENT“ or ”CVG GROUP Framework Agreement“). This CVG GROUP Framework Agreement is based on so called standard contractual clauses and the transfer of personal data is thus based on suitable guarantees within the meaning of article 46 pursuant to article 94 (2) of the GDPR.

### **The purpose of personal data processing**

The controller processes selected personal data of its employees and former employees (further only as the “**employees**”) for the following purposes:

- Employee personal and salary administration and execution of the employer legal obligations related to it, including records of worked hours
- protection of property and personal safety (visual camera system records)
- internal administrative purposes of the employer (organigrams and internal overviews/telephone lists of employees with contact data, issue slips for working aids and clothes)
- Recording of work performance and activities
- External presentation of the company , company events and other social activities(photographs, visual records)

### **Legal titles (purposes) of personal data processing**

Legal titles for the processing of employees’ personal data within the meaning of article 6 of the Regulation in relation to the above mentioned purposes include the following:

- execution of Controller’s legal obligations
- legitimate interests of the Controller
- Data subject consent

Based on a legal title: Data subject consent - only descriptive personal data are processed in the form of photographs and/or visual records for the purpose of: External presentation of the company , company events and other social activities. The employees may withdraw this consent at any time, in such case further processing ceases to be possible.

### **Methods of personal data processing**

The Controller processes employees’ personal data using the following methods and means:

- **Automated processing**  
Company internal information systems  
Camera system
- **Manual processing**  
Personal files of employees  
Other related documentation

#### **Camera system**

The Controller operates the camera system in its place of business/registered office in Stráž nad Nisou, as a system equipped with the function of visual recording The records are kept at the Controller’s registered office/place of business.

The camera system has been in place for the purpose of property protection and personal safety. The legal title for the processing are legitimate interests of the controller.

The camera system consists of cameras distributed around the premises for inspection and monitoring purposes. The premises with installed monitoring camera system are provided with clearly visible signs which include a pictograph as well as a short information text.

### **Personal data categories/scope of processing**

In terms of the scope of processing and data categories, the Controller processes the following personal data of employees:

- Identification, address and descriptive personal data:

Name and surname, personal number, surname at birth/former surname, sex, degree, date and place of birth, birth registration number, residence address, identity card number, citizenship, marital status, telephone number and e-mail address, completed education, previous job, professional qualifications, health insurance company, dependants, the amount of wage and bank connection; personal photographs (identification and other purposes: external presentation of the company, company events and other social activities); visual records in the camera system.

### **Personal data processing/retention period**

The personal data of employees are only retained for the necessary period, as long as the purpose and legal title for the processing continues, always for the period of the employment and/or consent to the processing of personal data. After the termination of the employment - in the case of the execution of legal obligations of the Controller, in compliance with the legal regulations for social security and pension insurance.

The camera system records are retained for the period of seven (7) days.

### **Data subject rights**

Employees as data subjects have the following rights in relation to the Controller within the meaning of articles 15 through to 22 of the Regulation:

- **right to access** to personal data, particularly the right to require the Controller to provide information concerning the processing of own personal data,
- **right to rectification** of personal data if inaccurate data are maintained,
- **right to erasure** of personal data (“right to be forgotten”)
- **right to restriction** of personal data processing exceeding the requirements of legislation,
- **right to object** to the Controller processing personal data,
- right not to be object of automated individual decision making, including profiling (with exceptions).

Besides that, the data subject is entitled to make a complaint to the supervisory authority, which is:

**Úřad pro ochranu osobních údajů (Personal Data Protection Authority)**

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