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Personal Data Processing Policy

Information regarding personal data processing

for the purpose of the applicant selection procedure for a work role in the company Elanor a.s.

Personal data will processed in accordance with relevant Czech and European laws and regulations, namely Regulation of the European Parliament and the European Council (EU) 2016/679 – Protection of natural of persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/ES (General data protection regulation), (further also as "GDPR").

I.Personal data administrator

The administrator of the personal data is Elanor a.s., ID: 15887219, address: Jemnická 1138/1, 140 00 Prague 4 – Michle registered at the Municipal Court in Prague under the case n. B 25583 (further also as "**company/administrator**").

II.Contact

- company address: BB Centrum Brumlovka Jemnická 1138/1, 140 00 Prague
- > email: <u>gdpr@elanor.cz</u>
- phone: +420 222 509 999

III. Purpose of processing and legal basis for the processing of personal data

Applicant selection procedure for a vacant work role. Processing of personal data is necessary for specific operations before the potential signing of a contract.

IV.Degree of processed personal data

Personal will be processed to a degree in which the applicant (subject of the data) has provided the data to the company in the context of expressed interest in a work role in the company.

The company will process the following personal data:

- first name and last name,
- > email address,
- other data provided in the CV, the cover letter, and other documents which were sent by the subject via the request form on the company website <u>www.elanor.cz</u>.

The company will not share the provided personal data with third parties and the data will be accessible only to authorized employees of the company and only to a degree necessary for data processing purposes.

V.Method of processing and protection of personal data

Personal data will be processed in a manual and automated manner and during the data processing, there will be no automated decision-making without the influence of human examination with legal effects on the subjects of the data. Information and personal data will be stored in electronic form on servers situated in the Czech Republic or on data carriers to which only authorized employees will have access.

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Company Elanor a.s. to adhere to the obligations as per Regulation of the European Parliament and the European Council (EU) 2016/679 from April 27th, 2016, general data protection regulation (further as "GDPR") accepted technical and organizational measures in order to ensure personal data protection and so that it could, in maximum degree, eliminate the risk of accidental or illegal destruction of personal data or their loss or modification, possible unauthorized or accidental access by third parties to the personal data, unauthorized transfer of personal data, unauthorized processing of other kind, as well as other misuse of the data.

For this reason, the company has implemented a certified system of data protection management as per requirements of the norm ČSN ISO/IEC 27001:2014 and information security and protection of personal data is ensured in accordance with the published Management System of Information Security Policy of the company and its related internal regulation basis.

VI.Period of keeping of personal data

We process personal data for only a specific period of time that is necessary for the purposes of their processing. We continuously assess if there is still a need for processing of specific personal data required for a specific purpose. If we ascertain that the data are no longer required for any of the purposes for which they have been processed, the data will be destroyed.

In regards to specific purposes of data processing, we have assessed a standard period of personal data processing as follows.

For the purpose:

- of legitimate interest and fulfillment of contracts, we process the data for the period of the candidate selection process for the vacant work role, however, no longer than for the period of 6 months.
- of granting consent of subjects of the data to the processing of personal data in order to offer different work roles in the next 3 years or, possibly, until the consent revocation.

VII.Your rights

The subject of the data has in terms of personal data processing the following rights:

- the right to access personal data as per Article 15 of GDPR,
- > the right to correct inaccurate data as per Article 16 of GDPR,
- > the right to remove personal data as per Article 17 of GDPR,
- > the right to limit personal data processing as per Article 18 of GDPR,
- > the right to transfer personal data as per Article 20 of GDPR,
- > the right to challenge the processing of personal data as per Article 21 of GDPR,
- > the right to submit a complaint to the Personal Data Protection Office as per Article 77 of GDPR,
- the right to not be a subject of any decision based solely on automated processing, including profiling, as per article 22 of GDPR

The subject of the personal data is eligible to exert any rights listed above at the company, be it personally, by sending a letter to the address of the seat of the company to the Compliance manager or by email to the address <u>gdpr@elanor.cz</u>

The company is required to respond to the request related to the rights stated above or to adhere to the request without unnecessary delay after the request has been delivered within one month of the delivery of the request.

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VIII.Revocation of consent with personal data processing

The subject of the personal data has the right to revoke at any time the granted consent to personal data processing for the purposes of receiving job offers for different work roles.

The revocation is required to be expressed in an explicit, understandable, and definite declaration of will, namely via an email to the address: gdpr@elanor.cz.