

Detailed information on personal data processing related to employment – general processes

Dear Sir / Madam,

Your employer is processing the required employee personal data related to employment, including personal data related to applicants for jobs prior to the actual start of their employment (i.e. data required to prepare necessary documentation) as well as former employees (i.e. for the purpose of mandatory archiving). In specific cases the employer is processing also personal data of other persons such as family members of relevant persons for tax purposes etc. Where the word “employee” is used in the text below in order to keep the description as comprehensive and clear as possible, it will always include all the above mentioned groups of persons.

With respect to the processing of personal data of members of statutory bodies and supervisory boards of the companies carried out on the basis of personal data processing related to employment, this information is provided also for members of these bodies. The same applies also to agency employees who have been temporarily allocated.

The detailed information in this document is intended for employees so that they are able to fully understand the processes for which this information is collected, and to properly deal with rights and obligations of employment participants. In the Detailed information you can find answers to the following questions:

- 1) How can you contact our Data Protection Officer (i.e. the person in charge of the protection of personal data)?
- 2) What is the purpose of your personal data processing and what is the legal ground (legal basis) for such processing?
- 3) What personal data do we use?
- 4) From what sources does this information come?
- 5) To whom are you giving your consent?
- 6) Who is entitled to process your personal data?
- 7) For how long will your personal data be stored?
- 8) What are your rights when your personal data is being processed?
- 9) Is your consent to the processing of personal data voluntary or mandatory?
- 10) Is there any automated decision-making, including profiling of your personal data?
- 11) How can you withdraw your consent to the processing of personal data?

1. How can you contact our Data Protection Officer?

Data Protection Officer (i.e. the person in charge of the protection of personal data) shall be a person appointed by the controller or processor of personal data on the basis of his / her professional skills, who is in charge of statutory tasks and acting as a point of contact for you, in any matter related to the processing of your personal data and exercising your rights under the law.

The Data Protection Officer is appointed in Generali Česká pojišťovna a.s. as well as in other entities within the Generali Group in the Czech Republic (including three linked foreign entities) identified in Article 5 of this document (hereinafter referred to as the “Group”), or this protection of personal data is provided through another body of the company (in cases where no duty to appoint such Data Protection Officer applies for any particular entity).

With your applications, questions or complaints, you can contact the Data Protection Officer for companies indicated in section 5, paragraphs a) to e) of this document at the following address: Generali Česká pojišťovna a.s., Na Pankráci 1720/123, Prague 4, dpo@generaliceska.cz (or at the address of the office or electronic address of each company acting as **joint controller** of personal data).

Personal data protection agenda for the company identified in section 5, paragraph i) of this document (Generali CEE Holding B.V., organizační složka, Company ID: 28239652) shall be provided by the Department of Compliance. You can contact this department regarding your applications, questions or complaints at the following address: Generali CEE Holding, B.V., Department of Compliance, Na Pankráci 1658/121, Prague 4, gdpr.ceeholding@generali.com (or at the address of the office or electronic address of each company acting as **joint controller** of personal data).

You can contact the Data Protection Officer identified in section 5, paragraph j) of this document (Assicurazioni Generali S.p.A.) with your applications, questions or complaints at the following address: Assicurazioni Generali, Piazza Cordusio no. 2, 20123 Milan, Italy – “to the attention of the Data Protection Officer“, dpoag@generali.com (or at the address of the office or electronic address of each company acting as **joint controller** of personal data).

For companies identified in section 5, paragraphs k) and g) of this document (Generali Real Estate S.p.A and Generali Real Estate S.p.A., CEE Branch, organizační složka), you can contact the Data Protection Officer with your applications, questions or complaints at the following address: Generali Real Estate S.p.A., Via Machiavelli 4, 34132 Trieste, Italy; dpo.gre@generali.com (or at the address of the office or electronic address of each company acting as **joint controller** of personal data).

For companies identified in section 5, paragraphs l) a h) of this document (Generali Operations Service Platform S.r.l.; Generali Operations Service Platform Czech Branch, odštěpný závod, organizační složka) you can contact the Data Protection Officer with your applications, questions or complaints at the following address Assicurazioni Generali S.p.A. Via Machiavelli 3, Trieste, Italy, alessandro.busetti@generali.com (or at the address of the office or electronic address of each company acting as **joint controller** of personal data).

Internal processes applicable to the companies acting as **joint controllers** of personal data must be set appropriately so that these companies are able to take uniform actions towards personal data subjects from the Czech Republic, irrespective of which company acting as **joint controller** of personal data is contacted by the subject of personal data.

2. What is the purpose of your personal data processing and what is the legal ground (legal basis) for such processing (the reason for such processing)?

The **purpose** of your personal data processing related to employment is to **comply with mutual rights and obligations between employers and employees**, and also to **ensure personnel policy and staff management** on the part of employers – Group subjects (entities).

The personal data processing shall be carried out on the basis of the following legal grounds (legal bases):

- 2.1. **compliance with obligations arising from law** (including unilateral resolutions to provide specification in accordance with and within the limits of legal provisions - legislation);
- 2.2. **compliance with rights and obligations established by mutual agreements** (in labour law usually just specifying and determining in more detail the rights and obligations within the scope laid down in relevant legal provisions);
- 2.3. enforcement of **legal interests** of contracting parties (parties to a legal relationship);
- 2.4. processing of personal data on the basis of a **consent** provided by the data **subject** that the employer is authorised to process the specific data, i.e. in compliance with your particular consent you have been or you will be asked for;

This shall **always be applied only** for the purposes laid down above and below in this Article 2.

Processing of personal data within the meaning of this document shall **thereby** mean, in addition to general **analysis** and **segmentation** of the data as well as **storing** and **selecting** the data, in particular the following:

processing not requiring the specific consent of the data subject (your consent)

- a. processing establishing conditions to **enter into** one of basic **contractual relationships** and to **make subsequent changes** to these relationships (employment, or one of two types of work agreements outside employment) and all other contracts (agreements) entered into in relation to employment amongst employers – members of the Group on one side, and employees on the other side; the same applies also to processing establishing conditions for unilateral establishment of rights and obligations in relation to employment (in accordance with legal provisions).
- b. processing related to the **verification of any criminal record that has not been expunged (erased) from criminal records** of an employee or job applicant (this is not always a condition for granting a job – with respect to the nature of work, it is necessary for the employer to be informed on criminal records in order to be able to adopt appropriate, non-discriminatory measures);
- c. processing **establishing conditions to comply with the obligations laid down by law** (in particular in the Labour Code), contractual arrangements and related legitimate interests of the employer (materials required to meet wage obligations and provide benefits) concerning both employees and, in specific cases, also other persons (such as family members – tax aspects etc.);
- d. processing of a photo used to **ensure safety** (such as identification of persons entering the company premises) and processing of images forming integral (inseparable) part of images containing a group of people (group images) aimed at informing people about facts being processed, such as images from various events etc.
- e. processing related to **assessment of medical fitness** to perform a particular job, documentation to accidents at work, or occupational disease;
- f. processing enabling to **track and prove the content of rights and obligations** between the employer and a former employee for any necessary period of time after termination of employment;
- g. processing required to meet statutory **archiving obligation** (duty to maintain an archive);
- h. processing establishing conditions to remove **conflicts of interest or eliminating risks** arising from actually existing conflicts of interest (not caused as a consequence of a breach of obligations and which it is possible to remove – such as verification of any potentially difficult financial situation);
- i. processing required to maintain rational management of human resources (i.e. staffing structure) within each company in the Group as well as the Generali financial group as a whole in the European context (evaluation of employees etc.);

- j. processing that allows a third party to establish a connection with an employee (in order to provide a third party with employee's contact details with relevant information related to employee's job – work position, method and time when the employee is able to serve the third party etc.) in cases where this processing is required to perform the agenda provided by the employer / employee;
- k. processing that allows a third party to assign access rights into the information system (i.e. to the IT system) of a third party and to monitor / keep records of activities performed in this system, should this be necessary for the exercise of rights and obligations arising from the contractual relationship between the third party and the employer;
- l. processing to enable a third party to comply with the requirements and obligations of the (external) controller;
- m. processing related to the fulfilment of rights and obligations related to the Covid-19 epidemic (in particular testing, vaccination, positivity information, etc.);
- n. processing required to **identify, exercise or defend legal claims**; in the event that you have decided to sign a contract or any other document using a biometric signature, we process biometric characteristics of the signature representing a special category of personal data, allowing us – in the event of any dispute – to prove that your will confirmed by your signature was actually provided by you, and to provide you with a higher level of protection against any misuse of your personal data;

and also any processing where a specific consent of the data subject is required (i.e. your approval):

- o. further processing of a **photography facilitating communication and orientation** in the company organisational structure (excluding any processing used to identify persons only or group images); this will include a photo displayed in employers' applications within the Group (e-mail, organisational manual / chart – rules of organisation etc.);
- p. processing of **private contacts to facilitate communication** with the employer outside employer's workplace;
- q. processing of your personal data for **marketing offers** (bids) of products of Group subjects (entities) or to determine **whether the client of the employer is also an employee of any member of the Group**, where this may be in the interest of the employee or the client (for example to simplify notifications of required cooperation related to insurance – payments, submitting documents etc.);
- r. processing of your personal data in the Talent Profile for employees who are already able to use the SIMBA electronic tool (Generali Investments CEE and Generali CEE Holding B.V., organizační složka / organisational unit).

3. What personal data do we use?

We use only personal data that is necessary for the above mentioned purpose of processing; this will include in particular the data listed in the Attachment to this document.

4. From what sources does this information come?

The information is provided by you (professional CV, completed questionnaires, documents submitted by you, inserted into your personal file etc.) or from public sources (such as public registers) or coming from sources previously agreed by you (such as references from previous employers).

5. Which companies will process personal data in accordance with his document, and who will be granted your permission to further process this data?

All the above mentioned companies act as joint controllers of your personal data processed in accordance with this Information.

The “Group” within the meaning of the above shall include:

- a. Generali Česká Pojišťovna a.s. (Company ID Number: 45272956),
- b. Generali Česká Distribuce a.s. (Company ID Number: 44795084),
- c. Generali penzijní společnost, a.s. (Company ID Number: 61858692),
- d. Generali Investments CEE, investiční společnost, a.s. (Company ID Number: 43873766),
- e. Acredité s.r.o.(Company ID Number: 25600958),
- f. Generali Real Estate Fund CEE a.s., investiční fond (Company ID Number: 24736694)
- g. Generali Real Estate S.p.A., CEE Branch, organisational unit (Company ID Number: 01757601),
- h. Generali Operations Service Platform Czech Branch, odštěpný závod (Company ID Number: 29044707),
- i. Generali CEE Holding B.V., organisational unit (Company ID Number: 28239652).

The above-mentioned group also includes, in the role of Joint Data Controller, the following foreign companies whose organisational unit is based in the Czech Republic, or where these foreign companies directly or indirectly influence particular entities operating in the Czech Republic. For the purpose of personal (HR) agenda, only personal data of entities in relation to these companies or to their organisational units in the Czech Republic are being processed.

- k. Assicurazioni Generali S.p.A., p.zza Duca degli Abruzzi, 2, 34132 Trieste, Italy, incorporated in “Section I of the Register of Italian Insurance and Reinsurance Companies under No. 1.00003”;
- l. Generali Real Estate S.p.A., Via Machiavelli 434132 Trieste, Italy, incorporated in the “Register of Enterprises of Venezia Giulia under No. 0312080328”;
- m. Generali Operations Service Platform S.r.l., Piazza Duca Degli Abruzzi 2, Trieste (TS) CAP 34132, Italy, Register No.01345740324.

6. Who is entitled to process your personal data and how is your personal data processed?

Group members process personal agenda in compliance with contracts that contain a provision on personal data processing by one member of the Group on behalf for other members of the Group, or contracts that are supplemented by such a provision; therefore any information submitted to one of the above mentioned members shall be **shared and processed together**, and each subject within the Group **shall act as a joint controller** of personal data. The Company's personnel staffing (i.e. personnel and wage agenda) of employees of Group members is jointly provided by Generali Česká pojišťovna a.s. With regard to foreign entities jointly acting as a **joint controller** of personal data along with other companies, the scope of jointly processed information and the method of processing thereof shall be modified according to current operational needs.

Statutory regulation of personal data protection enables the controller to entrust the processor (i.e. supplier of processing services, even external supplier – outside the members of the Group). The processor of personal data is any physical person or legal entity, who, in compliance with legal provisions, or authorisation by the controller, is processing personal data. In the event of HR

(personnel) agenda, this entity must always be for example personnel or educational agency, supplier of legal services and other expert advice, wage and administrative agendas, supplier of IT services and other providers of various services required to perform the personal agenda and agendas related to obligations of the employer (i.e. of the insurer). Should this procedure be used by any member of the Group in order to process your personal data, this can happen only on condition that all standards applicable to personal data protection by any particular processor are contractually guaranteed at least at the same level as within the Group while such a processor must meet statutory conditions (conditions laid down in legal provisions).

7. For how long will your personal data be stored?

The processing of personal data where you **have not been or you will not be asked** to give your consent with processing thereof, shall be carried out in accordance with legal grounds (reasons) pursuant to paragraphs 2.1. to 2.3. and such processing cannot be terminated without simultaneous termination of your employment-based relationship (i.e. concluded also on the basis of your will). Processing enabling to track and prove the contents of rights and obligations amongst subjects (entities) and processing to meet the archiving obligation (duty to maintain an archive) shall be carried out over any necessary period even after the employment has been terminated.

The processing of personal data that is **carried out on the basis of a consent given by you** (according to paragraph 2.4.), can be withdrawn. This is the type of processing that can be terminated without necessitating the termination of the employment relationship (which is why withdrawal of consent is possible). You have been or you will be asked to give consent in the following cases:

- Giving consent to processing of your private contact details, where these have been provided (phone numbers, e-mail addresses etc.) to the company, and using these details to facilitate the communication, starting on the date you provided these details to the employer for the period of 16 years after the termination of your employment.
- Giving consent for the employer to process your photo to be displayed in internal applications (e-mail addresses, organisational manual / chart – rules of organisation, corporate information etc.) to facilitate the communication and orientation in the staff structure over the period of your employment. (This processing is different from the processing such as for the purpose of personal identification carried out according to the employer's legitimate interest, upon entering the building, group pictures etc.).
- Giving consent for the employer to process, throughout the period of your employment, your personal data for marketing offers of products of Group subjects (entities) or to indicate whether an employer's client is also an employee of a Group member in cases where this may be in the interest of the employee / client (for example to prompt notifications on necessary cooperation related to insurance – payments, documents required to be submitted etc.).

Personal data is processed over the period necessary for the purpose of the processing.

8. What are your rights when your personal data is being processed?

Regarding your personal data, your rights comprise as follows:

- Right to access your personal data – you can ask Generali Česká pojišťovna a.s. or any other subject / entity within the Group to access your personal data relating to you / data we are processing about you;
- Right to correction (i.e. the right to have the inaccurate or incomplete data corrected / rectified) – you can ask Generali Česká pojišťovna a.s. or any other subject / entity within the Group to amend / fix any inaccurate or incomplete personal data relating to you;
- Right to deletion (erasure; right to have the data erased) – you can ask Generali Česká pojišťovna a.s. or any other subject / entity within the Group to delete your personal data if any of the following situations has occurred:
 - a. personal data is not any more required for the purpose for which it had been collected or otherwise processed;
 - b. you have withdrawn (revoked) your consent with your personal data processing, and there is no other legal ground (reason) to continue with this processing;
 - c. you have raised objections against to be an object of decision-making based on automated processing of your personal data and there are no prevailing legitimate grounds (reasons) for such processing, or you have raised objections against processing of you personal data. However, currently no tools for automated processing are in use;
 - d. your personal data has been processed unlawfully;
 - e. your personal data must be deleted to comply with statutory obligations laid down by legislation of the European Union or a member country applicable to the controller of your data;
- Right to have the processing restricted – you can ask Generali Česká pojišťovna a.s. or any other subject / entity within the Group to restrict the processing of your personal data if any of the following situations has occurred:
 - a. you have denied the accuracy of your personal data; this shall apply for a period required for Generali Česká pojišťovna a.s. or any member of the Group to get the accuracy of your personal data verified;
 - b. the processing of your personal data is unlawful (illegal, wrongful), but you are refusing to have the data erased (deleted), instead of this you request a restricted use of such data;
 - c. Generali Česká pojišťovna a.s. or any member of the Group does not need the personal data for the purpose of processing any more but you request this data to determine, exercise or defend your legal rights;
 - d. you have raised objections against the processing of your personal data until it has been verified whether legitimate grounds (reasons) of Generali Česká pojišťovna a.s. and any other subject / entity within the Group prevail over your legitimate grounds (reasons);
- Right to data portability – you are authorised to acquire the personal data related to you that you have submitted to Generali Česká pojišťovna a.s. or any other subject / entity within the Group, in a structured and machine-readable format, and this right must not have any adverse impact on rights and freedoms of other persons.
- Right to withdraw your consent – you are authorised to withdraw (revoke) your consent to the processing of your personal data for the purpose for which you have given your consent, and you are allowed to do this at any time.

- Right to object – you are authorised to raise an objection to the processing of your personal data that we carry out for our legitimate interests, and you are allowed to do this at any time. Should you raise an objection, we are obliged to stop processing your personal data for a given purpose, unless we find out, in the course of our investigation, that we have serious legitimate reasons for such processing, or if we need to determine, execute or defend our legal claims.
- Right to complain – you have the right to lodge a complaint with the supervisory authority, which is Office for the Protection of Personal Data, Pplk. Sochora 27, postal code 170 00, Prague 7.

9. Is your consent to the processing of personal data voluntary or mandatory?

Giving consent to the processing of your personal data in the scope you were or will be asked for such a consent, is strictly voluntary (on the contrary – no specific consent is required to the processing in accordance with paragraphs 2.1 to 2.3 of this document).

10. Is there any automated decision-making, including any profiling?

When processing HR (personal) agendas, we use analyses that are based on evaluation of all available data. However, these analyses of processing do not involve fully automated decision-making.

11. How can you withdraw your consent to the processing of personal data?

You can withdraw (revoke) your consent to the processing of your personal data at any time at the following address: <https://ep1.cpoj.cz:50101/irj/portal> – on this address, click through to the “personal consents” tab (it is not possible to use this option prior to starting the job); e-mail address: cps@generaliceska.cz, or in writing at the following address: Generali Česká pojišťovna a.s., Department of Human Resources and Strategy, Na Pankráci 1720/123, 140 21 Prague 4, or at the address of the registered offices of Group members. The processing of your personal data will be immediately terminated.