

PERSONAL DATA PROCESSING POLICY

Czech Television, a public service broadcaster based at Kavčí hory, 140 70 Prague 4, Id. No.: 00027383, considers the protection of personal data and the privacy of its viewers and other individuals to be one of its priorities. For this reason, Czech Television introduced, adheres to, and regularly updates measures aimed at ensuring maximum protection of the personal data of the individuals (data subjects) who are processed by Czech Television. These measures include the personal data processing policy (hereinafter the “**Policy**”) listed below, which summarises the basic information about the kinds of personal data processed by Czech Television within its activities, as well as the period and reason for the processing.

This Policy also contains basic information on the rights of data subjects under the **General Data Protection Regulation** (Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR)) and other related legal regulations (e.g., Act No. 110/2019 Coll., on personal data processing).

1. CATEGORIES OF THE PERSONAL DATA PROCESSED

Czech Television usually processes the following categories of personal data:

- a) **Identification details** – for example, the first name and surname, academic degree, date of birth or birth identification number, Id. No. (IČO) and identification document number.
- b) **Contact details** – for example, the telephone number, email address, permanent residence address, contact address, invoicing address, other communication addresses or social media contacts.
- c) **Information on the services provided** – for example, specification of the services provided and other service-relevant data relating to the data subject.
- d) **Data relating to communication between Czech Television and data subjects** – for example, data provided by the data subject in relation to participation in a contest organised by Czech Television, processing of applications or data related to the negotiation and performance of agreements on the provision of services or the sale of goods.
- e) **Special categories of personal data** – e.g. personal data concerning health provided in order to prevent the spread of contagious diseases, increase the safety of the working environment and demonstrate compliance with duties laid down by legal regulations on the grounds of public interest in the area of public health.

2. PURPOSES, LEGAL GROUNDS, DURATION OF PROCESSING AND OTHER CIRCUMSTANCES OF PROCESSING

Personal data are always processed by Czech Television only to the extent necessary for the purposes for which the personal data are collected. Personal data are always processed on the basis of a certain statutory ground and within its legal scope.

Czech Television processes personal data for the following purposes, without limitation:

Area of processing:		Purpose of processing:
1.	PROVYS - Programming - Production of TV programmes	Keeping an information system for management of production and broadcasting of programmes, including their producers and other persons involved
2.	Access system – visitors (accompanied guests)	Records kept on persons entering the premises of the Czech Television (protection of the controller, discharge of Czech Television's obligations laid down by law)
3.	Filing archive	Discharge of Czech Television's obligations laid down by law
4.	TV licence fees	Keeping a database of individual payers of TV licence fees and discharge of Czech Television's obligations laid down by law
5.	Telephone directory and email directory	Keeping an internal telephone directory in written electronic form (Intranet, MS Outlook) and keeping an email directory
6.	Czech Television website	Promotion of Czech Television, publication of personal data of selected Czech Television employees on the Czech Television's official website (http://www.ceskatelevize.cz), contests, e-shop, marketing, cookies
7.	Register of actors and extras	Study of screenplays, search for suitable actors, consultations with directing and production teams, ensuring suitable casting and extras in programmes. Dealings with theatre managers as part of arranging mutual co-operation. Dealings with private actor agencies representing performing artists, conclusion of agreements between Czech Television and individual agencies. Editing and regular updating of the data in the Register of Theatres and the Register of Actors, taking photographs of actors, following aspiring actors at art schools
8.	Video library, documents, news and film archiving, digital archives	Processing of materials to ensure the production and storage of magnetic, video-tape and film carriers, records of loans
9.	Film technology	Economic management and keeping records of film technology for employees and external workers to ensure production, records of loans
10.	Studio, broadcasting and external technology	Economic management and keeping records of TV technology to ensure production, broadcasting and keeping records of loans
11.	Fire protection	Discharge of obligations laid down by law
12.	Props collection	Keeping records of costume and props loans as part of commercial rental to external clients
13.	Recording, archiving and administration of CCTV visual information	Discharge of obligations laid down by law, protection of property and employees of Czech Television and protection of other persons present on the premises of Czech Television, control over access and entry to

		the premises of
		Czech Television and its individual buildings, also with a view to ensuring public safety and preventing emergencies
14.	Journalistic licence, artistic license	Authorised publication of personal data in accordance with a special legal regulation (the Civil Code), public interest – performance of a legal obligation (provision of a public service) or legitimate interests
15.	Programming development	Keeping records of themes and projects created by authors and independent producers, commissioning new programmes on the grounds of a legitimate interest in the protection of the Czech Television's programming development
16.	List of locations	Records of properties suitable for filming programmes on the basis of the owners' consent
17.	Covid-19 testing	Discharge of obligations on the grounds of public interest in the area of public health, preventing the spread of Covid-19 and increasing the safety of the working environment

All personal data are processed by Czech Television for a specific purpose; the use of the personal data in a manner incompatible with the specific purpose never occurs. Czech Television processes personal data only for the period necessary to achieve the relevant purpose or for the period laid down by legal regulations. Personal data may be processed longer only for archiving purposes in the public interest; for scientific or historical research purposes or for statistical purposes.

Personal data processed on the legal ground of performance of a contract are processed during the term of the contractual relationship and subsequently for the period necessary to secure the legal claims following from the contract (i.e. for the period during which the mutual rights and obligations following from mutual contracts may become the subject of a court dispute).

Personal data processed on the legal ground of the data subject's consent are processed until the consent of the data subject is withdrawn, but no longer than for a period of 5 years after granting the consent.

The provision of personal data for processing on the basis of the data subject's consent is completely voluntary and the consent may be withdrawn at any time. However, this in no way precludes the lawfulness of the processing performed prior to the withdrawal of the consent.

3. SOURCES OF PERSONAL DATA

Czech Television obtains personal data especially from the following sources:

- a) from basic population registers (for the purposes of keeping records of TV licence fee payers);
- b) from publicly available registers, lists and records;
- c) from third parties if the data subject has given their consent to this effect or Czech Television is entitled to obtain such personal data on the basis of other legal grounds;

d) from the data subjects themselves.

4. RECIPIENTS OF PERSONAL DATA AND SHARING WITH OTHER CONTROLLERS

Where Czech Television uses the services of specialists who process personal data in their profession (such as marketing agencies, IT service providers and other contractors) these persons agree to process personal data exclusively in accordance with Czech Television's instructions. The processor in the area of TV licence fees is Česká pošta, s.p., Id. No. 47114983, with its registered office in Prague 1, at Politických vězňů 909/4, Postal Code 22599.

In certain areas, Czech Television co-operates with other personal data controllers, where personal data are processed jointly by these controllers (joint controllers). Czech Television also transfers personal data when undertaking a legal obligation (e.g. at request of the Police of the Czech Republic) or in the protection of its rights (e.g. enforcement of unpaid TV licence fees).

Personal data are transferred to third parties always in accordance with the applicable legal regulations and in compliance with the highest standards of personal data protection, ensuring proper protection of the rights of data subjects and their privacy.

Czech Television transfers personal data to international organisations or third countries outside the EU/EEA. In the case of countries that ensure the level of personal data protection corresponds to the level of protection in the EU/EEA based on a decision of the European Commission, Czech Television proceeds in accordance with its internal regulations and the GDPR.

If personal data are transferred to countries that do not ensure adequate protection of personal data at the level of protection in the EU/EEA, Czech Television guarantees implementation of additional security and protective measures in accordance with requirements of the GDPR, including the use of standard contractual clauses approved by the European Commission.

5. RIGHTS OF DATA SUBJECTS

5.1. The right of access to personal data

The data subject has the right of access to personal data and may request that Czech Television provide information on whether it processes their personal data; on the purposes of processing; the categories of personal data concerned; the recipients to whom the personal data have been or will be disclosed; the estimated period of processing; the existence of the right to request from the controller rectification or erasure of personal data or restriction of their processing, or to object to such processing; the right to lodge a complaint with a supervisory authority; any available information as to the source of the personal data, if not obtained from the data subject; the existence of automated decision-making, including profiling; and appropriate safeguards if data is transferred outside the EU. At the data subject's request, Czech Television will provide a copy of the personal data being processed. If the data subject repeatedly requests the provision of a copy of the personal data being processed or the data subject's request is manifestly unfounded or excessive, Czech Television may either charge a reasonable fee to cover administrative costs or refuse to act on the request.

The data subject does not have the right of access to personal data if the personal data are not published by the Czech Television and are processed only for journalistic purposes or for the purposes of academic, artistic or literary expression. In other cases, Czech Television may exclude access to personal data in justified cases, especially if the legitimate purpose of personal data processing could be jeopardised or prolonged,

or if it would require excessive effort.

5.2. Right to rectification of inaccurate data

The data subject has the right to rectification of inaccurate personal data processed by Czech Television. Czech Television adopts reasonable measures to ensure that personal data processed are accurate and up-to-date; however, if the data subject finds out that their personal data are inaccurate or incomplete, they may request that their personal data be updated. After verifying the identity of the data subject, Czech Television shall amend the personal data.

5.3. The right to erasure of personal data

The data subject may request at any time that the personal data concerning them be erased. Czech Television shall erase all personal data of the data subject without undue delay if it no longer needs them (e.g. for the provision of services, performance of a contract, etc.). However, even on request of a data subject, Czech Television is not obliged to erase personal data if there are legitimate grounds for the processing of such personal data.

5.4. Right to restriction of processing

The data subject has the right to request that Czech Television restrict the processing of personal data concerning them. The data subject has the right to restriction of processing only in the following specified cases:

- The accuracy of the personal data is contested by the data subject for a period enabling Czech Television to verify the accuracy of the personal data.
- The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead.
- The personal data are no longer necessary for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
- The data subject has objected to processing, pending the verification whether the legitimate grounds on the part of Czech Television override those of the data subject.

If the data subject requests the restriction of the processing of their personal data, Czech Television will restrict the processing of personal data to the necessary minimum (storage) and, where applicable, process the data only for the establishment, exercise or defence of legal claims, or for the protection of the rights **of another person**, or for other limited reasons stipulated by the applicable legal regulations. If the restriction is cancelled and Czech Television resumes the processing of the personal data, the data subject will be notified accordingly without undue delay.

5.5. Notification of rectification, erasure or restriction of processing

Czech Television notifies all recipients to whom the personal data have been disclosed of any rectification, erasure or restriction of personal data processing. If rectification, erasure or restriction of personal data processing should be required, Czech Television will inform the individual recipients, except for cases where this proves impossible or requires excessive effort. The data subject may request that Czech Television provide information on these recipients.

If – in relation to personal data processing for journalistic purposes or for the purposes of academic, artistic or literary expression carried out in a manner enabling remote access – Czech Television is obliged to notify the recipients of the rectification, erasure or restriction of personal data processing pursuant to Art. 17(2) or Art. 19 of the GDPR,

Czech Television may comply with this obligation by specifying the information on the time of the last update of the content in which the personal data are or have been indicated, or by another suitable measure.

5.6. Right to portability of personal data

Each data subject has the right to receive the personal data concerning them which has been provided to Czech Television in a structured, commonly used and machine-readable format. Each data subject also has the right to request that Czech Television transmit these data to another controller. However, this right may only be exercised in specified cases where personal data are processed by automated means and, at the same time, based on:

- a) consent of the data subject pursuant to Art. 6(1) of the GDPR or, in case of sensitive data, on consent granted in accordance with Art. 9(2)(a) of the GDPR; or
- b) performance of a contract to which the data subject is a party pursuant to Art. 6(1)(b) of the GDPR.

5.7. Right to object to personal data processing

The data subject has the right to object to the processing of their personal data by Czech Television. If it is not demonstrated that there are compelling legitimate grounds for processing which override the interests, rights and freedoms of the data subject, Czech Television will terminate the processing of the personal data concerned without undue delay on the basis of the objection.

5.8. Right to lodge a complaint

Each data subject has the right to lodge a complaint concerning the processing of personal data with the supervisory authority, specifically the Office for Personal Data Protection, which is located at Pplk. Sochora 27, 170 00 Prague 7, www.uoou.cz.

6. PERSONAL DATA PROTECTION CONTACTS

In any matter concerning your personal data, you may contact Czech Television electronically at osobniudaje@ceskatelevize.cz or in writing at the following address: Česká televize, Kavčí hory, 140 70 Praha 4.

If your request or complaint contains all the necessary requisites and relevant information, Czech Television will contact you and inform you of the steps taken. If required, Czech Television will ask you to supply additional information to support your request or complaint.

7. THE OFFICE FOR PERSONAL DATA PROTECTION

The data subject has the right to lodge a complaint with the supervisory authority in the area of personal data protection, i.e. the Czech Office for Personal Data Protection, at the address: Pplk. Sochora 27, 170 00 Praha 7, website: www.uoou.cz, email: posta@uoou.cz, telephone: +420 234 665 111.