

# GROUP PRIVACY NOTICE FOR EUROWAG EMPLOYEES

This privacy notice is intended for current and former employees of EUROWAG, and individuals working with us under different types of contracts, including temporary workers or members of the company's body, as well as job applicants (we refer to all these individuals as "**employees**").

We designed this notice to ensure compliance with our informational obligations according to Articles 13 and 14 of the EU General Data Protection Regulation ("**GDPR**") as well as other local data protection legislations.

This document describes in detail what personal data we collect, for what purposes we need it, how we handle and protect it, and what rights data subjects have. Please read it carefully.

The latest version is always available on our intranet.

If you are not a EUROWAG employee but are instead a customer or supplier, please visit our website at [www.eurowag.com](http://www.eurowag.com) to read our [Group Privacy Notice](#).

## What can be learned about the personal data from this document?

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## Our commitment to privacy

At EUROWAG, the protection of personal data and the privacy of our employees are priorities. To this end, we have established a comprehensive system for the protection of personal data, which is detailed in the Group Personal Data Management Directive. The functionality and effectiveness of the entire system are overseen by the Group DPO.

Personal data of our employees is stored with the highest security. Access is tightly controlled and only granted to authorized personnel and trustworthy third parties who process the data according to our strict guidelines.

## Finding help

To understand how personal data is protected, the rights of data subjects, and other GDPR-related issues, or to address any questions and make suggestions, please contact the Group DPO.

**Contact details of our Group DPO are as follows:**

- e-mail: [compliance@eurowag.com](mailto:compliance@eurowag.com)
- address for correspondence: W. A. G. payment solutions, Inc. - Compliance department, Na Vítězné pláni 1719/4, 140 00 Prague 4, Czech Republic.

## Why do we process personal data and who is responsible for data protection at EUROWAG?

We only collect and process the personal data necessary to recruit and select suitable employees for open jobs, establish an employment relationship, ensure mutual fulfilment of rights and obligations arising from this relationship, comply with legal obligations applicable to EUROWAG, or to protect the legitimate interests of us or third parties.

The responsibility for processing the personal data of our employees, including compliance with all legal requirements, lies with the personal data controller (see Article 24 GDPR). The controller of your personal data is the specific company within EUROWAG (see a list [here](#)) with which the employee has an employment contract or other type of contract, or with which the candidate applied for the offered job position.

Other legal entities within EUROWAG act as joint controllers (see Article 26 GDPR) in processing employees' personal data. This relationship enables the legal transfer and sharing of necessary personal data within EUROWAG.

## What categories of personal data do we process?

Employees' data processing includes the personal data listed below, which may vary depending on the job position and the type of work performed. In necessary cases, we also process information about family members of employees that the employees provide us (see section: Personal data of third persons of this chapter).



## Common Personal Data of Employees

### Identification and contact information:

- Name, surname, date and place of birth, gender, any number of identification documents.
- Permanent residence address, mailing or other contact address, phone number and email address.
- Facial photograph.

### Basic data related to the employment relationship:

- Education, qualifications, experience and skills.
- Results of the initial medical examination.
- End date of previous employment and relevant employment duration.
- Work references from previous employers and other information obtained as part of the employee's credibility (background) check.
- Information about long-term unemployment, court-ordered salary deductions or confiscations.
- Type of work performed, place of work and duration of employment, salary and (non-) entitlement components of remuneration and other information contained in contracts or other agreements with EUROWAG.
- Additional information provided by the employee for annual tax settlement and tax deduction purposes, such as details from a child's birth certificate, disability card, statements from the other parent's employer, income declarations from the spouse, proof of identity, study confirmation, preschool facility confirmation, etc.
- Bank account number for salary payments.
- Additional data for foreign workers, including passport number and issuing authority, gender, sector classification, highest education achieved, required education for the job, employment permit duration, employee card, intra-company transferee card or blue card, residence permit, employment start and end date, deployment by a foreign employer, copies of documents proving the foreigner's legal stay in the country where the employee performs work.
- Driver's licence details, including a copy of the driver's licence.

### Data created and collected during the employment relationship:

- Salary paid, deductions, mandatory contributions, financial assistance, compensation and claims.
- Results from mandatory occupational medical examinations.
- Records of working hours, overtime, on-call duty, absences, business trips, work incapacity, vacations, and sick leave.
- Employee's place of residence during temporary work incapacity, extent and duration of allowed outings, and compliance checks with the set regime of the temporarily incapacitated employee.
- Results of training, task performance, evaluations of productivity and identified shortcomings.
- Investigations of misconduct and corrective measures implemented.
- Ways of employment termination.
- Access data (usernames and passwords) to information systems and logs of their use.



- Electronic identification data (IP address of the assigned device).
- Internal and external electronic communications from company devices.
- Geographical location of the company car used by the employee, driving method, traffic offenses and accidents in which the employee was involved.
- Phone calls made from the company phone.
- Internet sites visited from a company device.
- CCTV system recordings and data from the Data Loss Prevention system.
- Promotional audiovisual recordings.

Special categories of personal data or other sensitive data of employees:

- Changes in work capacity.
- Work-related injuries or occupational illnesses.
- Testing positive for infectious diseases, quarantine orders, contact with infected or suspected infected persons and contacts of an employee who has tested positive with other employees.
- Information on pregnancy, disability and other personal and family circumstances, as well as personal data related to criminal convictions and offences, if there is a valid reason based on the nature of the work to be performed. This requirement must be reasonable or stipulated by law or specific legal regulation.

**Personal data of third persons**

- Basic personal data of the employee's spouse and/or children when applying for tax benefits. This includes identification details, employer information, and disability card status.
- Basic personal data of individuals making claims against EUROWAG in relation to a certain employee.

**Where do we collect personal data from?**

The processed personal data is usually obtained directly from the employees themselves or is generated during the performance of their work. We may also obtain personal data of our employees from public records or from government authorities, relevant contractors (e.g., headhunters) and other third parties (e.g., previous employers and educational institutions where the employee received education or qualifications).

**For what purposes and on what basis do we process personal data?**

At EUROWAG, we process the personal data of our employees for the purposes of processing and on the basis of the following legal grounds listed in the table below.

| Purpose of processing   | Legal basis for processing                      |
|---|---|
| Recruitment and selection of suitable employees for open jobs positions | Pre-contractual measures<br>Legitimate interest |
| Retaining personal data of applicants for future job opportunities      | Consent   |

|  |  |
|--|--|
| Conclusion and performance of the employment or other contracts  | Contract performance<br>Fulfilment of legal obligation |
| Payroll and accounting policy  | Contract performance<br>Fulfilment of legal obligation |
| Keeping records for the purposes of health insurance, social and retirement security                                       | Contract performance<br>Fulfilment of legal obligation |
| Tax calculation and bookkeeping  | Fulfilment of legal obligation                         |
| Occupational safety and health protection  | Fulfilment of legal obligation                         |
| Administration of courses and training   | Fulfilment of legal obligation<br>Legitimate interest  |
| Administration of occupational medical examinations  | Fulfilment of legal obligation                         |
| Protection of property, including information systems and data, and other legitimate interests of EUROWAG (detailed below) | Legitimate interest                                    |

## Pre-contractual measures and contract performance

Personal data of employees is necessary to conclude and fulfil employment contracts or other contracts or agreements.

## Fulfilment of legal obligations

As employers, companies in our group are subject to various laws that require processing of certain employee personal data. These include labour laws, public health insurance regulations, sickness insurance, social security, tax and accounting laws, fire protection and workplace safety.

## Legitimate interest

The law allows us to process employees' personal data if it is necessary to protect our legitimate interests (as the controller) or the interests of a third party (in particular, other EUROWAG companies).

Our legitimate interests include:

- Employee's credibility (background) check.
- Employee attendance management.
- Protecting property, including information systems and data. This involves processing personal data through security cameras, entry records and software tools that protect against internal and external threats.
- Ensuring internal and external communication, including creating email addresses with employee names or listing employee names on our internet or other contract lists.
- Management of performance, career and professional development of employees.
- Administering employee entitlements and benefits.
- Recording damage incidents.
- Investigating and resolving cases of misconduct, including illegal activities.

- Conducting disciplinary proceedings.
- Documenting payments to third parties.
- Handling disputes – asserting claims, resolving conflicts, and enforcing agreements.
- Building of the organizational culture.
- Promotion of EUROWAG, including the use of photos and audio-visual recordings of employees, from mass events or trainings, which are usually published on the intranet.

**Every employee or other data subject has the right to object to processing based on a legitimate interest.** If they do so, we will stop processing the relevant personal data unless we can demonstrate compelling legitimate grounds for the processing that override the interests, rights and freedoms of the data subject, or if the processing is necessary for the establishment, exercise or defence of legal claims.

## Consent

With regard to the unequal position between the employee and employer, we try to avoid processing on the basis of consent. If a situation arises where processing is not possible without consent, employees will have the option to grant or refuse consent without any consequences. Any given consent can be subsequently withdrawn at any time.

## Automated individual decision-making

Personal data of our employees is not used for automated individual decision-making, including profiling in accordance with Article 22 GDPR.

## How long do we keep personal data?

Personal data is usually kept for the duration of the basic employment relationship. After the end of the employment relationship, we only keep selected personal data, especially for the period required by law. This can be up to 50 years or, in some countries, permanently, for purposes such as payroll and accounting records for pension insurance.

Personal data of job applicants is kept for the duration of the selection process. When we are interested in approaching an applicant who was not accepted with an offer of employment in the future, we will require consent.

Additionally, we retain selected personal data for a reasonable period, in order to effectively protect the legitimate interests of our group or other third parties, for example for the duration of the statutory limitation period or for the duration of ongoing legal proceedings.

Personal data processed on the basis of consent is kept only for the period during which the given consent is valid. If consent is withdrawn, it does not affect the legality of the processing done before the withdrawal.

## To whom and where can personal data be transferred?

Personal data is shared within EUROWAG primarily to ensure effective recruitment and selection of employees, high-quality employment services, internal administration and reporting.



As a common practice, third-party service providers are used to process employee personal data. These so-called processors are authorized to handle the data only for the specific purposes assigned to them.

Our processors include:

- IT and telecommunications service providers
- Personnel agencies, headhunters and operators of personnel portals
- Printing and postal service providers, including couriers
- Suppliers of accounting services
- Providers of employee benefits and training services
- Business travel service providers
- Debt recovery entities
- Auditors and legal advisors

Additionally, personal data is shared with the third parties, which act as separate controllers, for example medical service providers and attorneys.

Upon a legitimate request, personal data of our employees may also be transferred to third parties with the legal authority to require such a transfer. This primarily includes various governmental bodies. Additionally, personal data may be shared upon request of the data subject, for example providing information about income when obtaining a bank loan.

There is no intention to transfer the personal data of employees to third countries that do not provide an adequate level of personal data protection or without concluded standard contractual clauses.

## What rights does the data subject have and how can they be exercised?

We would like to bring the following rights to your attention, especially:

- **The right to object to the processing of personal data on the basis of legitimate interests and on the legal basis of a public interest.**
- **If personal data is processed on the basis of consent, there is the right to withdraw consent at any time.**
- **The right to effectively object to the processing of personal data for direct marketing purposes, including profiling.**

In addition, the GDPR provides a number of data subject rights as well as conditions for their exercise. While some rights are “automatic,” such as consent withdrawal or direct marketing objection, some rights are linked to specific conditions that might not be met in every case. It is the role of authorized staff, overseen by the Group DPO, to properly assess requests and inform you in a timely manner, usually within one month (a period which can be prolonged).

Among others, the following rights are included:

- The right to request access to personal data. This includes the right to confirm whether personal data is processed, the right to access personal data, and the right to obtain a copy of the personal data processed, if it is technically feasible.
- The right to rectification (correction), if incomplete or inaccurate personal data is processed.
- The right to erasure of personal data.



- The right to restriction of processing of personal data.
- The right to data portability.
- The right to object to processing, including profiling based on legitimate or public interest.
- The right to object to processing for direct marketing purposes, including profiling.
- The right to not be subject to automated individual decision making.

There is also a right to file a complaint to the relevant data protection supervisory authority or to apply for judicial remedy. Please be aware that the leading supervisory authority according to the place of the main establishment for EUROWAG is the [Office for Protection of Personal Data of the Czech Republic](#), but you can also enforce your rights with the help of any concerned supervisory authority from a country where EW entities operates and is more suitable for you because of language or distance. More information about supervisory authorities of EEA states can be found [here](#).

