



PROCESSING OF PERSONAL DATA IN THE BRNO iD E-SHOP

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INFORMATION ON PROCESSING OF PERSONAL DATA IN THE BRNO iD E-SHOP

This document provides essential information on how we process your personal data.

We protect your personal data to the greatest extent possible and aim to be as transparent as possible in how we process your personal data. The information memorandum has been prepared based on and in accordance with the Regulation of the European Parliament and of the Council (EU) 2016/679 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 (GDPR).

Technické sítě Brno, akciová společnost (Technical Networks Brno, joint-stock company) with its registered office at Barvířská 5, 602 00 Brno

Company ID: 25512285 (hereinafter referred to as "TSB") hereby, as a personal data controller, fulfills the information obligation towards data subjects according to articles 13 and 14 of the GDPR. This information memorandum provides basic information that we, as personal data controller, are obliged to provide. If you have any questions regarding the processing of your personal data, you can contact us at the contact address: info@brnoid.cz or at our registered office address. If you wish to exercise any of your rights, please be prepared that we will need to identify you properly and verifiably as the applicant.

The contact point of the Brno iD e-shop (hereinafter referred to as "Brno iD") for receiving data subject requests is the TSB registry office (podatelna@tsb.cz). The rights mentioned in articles 15 to 22 of the GDPR regulation can be exercised by the data subject at TSB:

- a) in written paper form (request with an officially verified signature sent by post)
- b) in written electronic form (email with a qualified or certified electronic signature or from a data mailbox)
- c) in written paper form (request submitted in person at the TSB registry office – subject to identification by an ID card).

WHAT ARE THE CONTACT DETAILS OF BRNO iD AS THE DATA CONTROLLER?

You can use the following contact details for communication and submitting requests related to the processing of personal data:

- Delivery address: Barvířská 5, 602 00 Brno
- Email address: info@brnoid.cz
- Data mailbox identifier: 55kgizb
- Other contact details can be found at: www.tsb.cz

WHO IS THE DATA PROTECTION OFFICER?

TSB has appointed a Data Protection Officer in accordance with Article 37 of the GDPR. The Data Protection Officer is an individual with expertise in data protection, responsible for ensuring that personal data processing is conducted properly, especially in accordance with legal regulations. You can contact the DPO and their office at the email address ouu@tsb.cz or the delivery address.



FOR WHAT PURPOSES DOES BRNO iD PROCESS PERSONAL DATA?

TSB processes personal data for the purpose of offering Brno iD services. This includes, for example, the option to purchase non-transferable prepaid tickets, as well as for the purposes of many other Brno iD services that require the use of personal data in their utilization.

WHAT IS THE LEGAL BASIS FOR BRNO iD TO PROCESS PERSONAL DATA?

Legitimate interests are further described in Recitals 47-49 of the GDPR. The data controller can utilize a legitimate interest if the controller's interest outweighs the interests of the data subjects. Legitimate interests of the data controller include, for example:

- Processing personal data necessarily required for the purposes of making some Brno iD products and services available
- Processing personal data necessarily required for the purposes of fraud prevention
- Transferring personal data within the Brno-iD group for internal administrative purposes
- Preventing unauthorized access to electronic communication networks and the spread of potentially harmful codes and preventing attacks

HOW DOES BRNO iD OBTAIN PERSONAL DATA?

Brno iD acquires personal data directly from individuals, i.e., from the data subjects themselves, including from forms filled out within the Brno iD environment (especially in the “My Account” section).

WHAT CATEGORIES OF PERSONAL DATA DOES BRNO iD PROCESS?

TSB processes personal data of data subjects to the extent necessary to fulfill the given purpose and also in accordance with the data minimization principle.

TSB processes the following categories of personal data:

- Contact information, which includes:

contact address, email address, telephone number—personal data allowing TSB to contact someone during the processing of their request or during the fulfillment or settlement of a contract.

- Identification data, which includes:

name, surname, date of birth, personal identification number, photographs, and permanent address—personal data allowing TSB to identify a data subject uniquely and unmistakably.

- Status data, which includes:

discount entitlements and categories (such as student status, senior citizen status, etc.) that allow access to certain services at discounted pricing conditions (e.g., discounted non-transferable prepaid tickets).

WHAT IS THE LEGAL BASIS FOR BRNO iD TO PROCESS PERSONAL DATA?

The legality of processing is established by Article 6(1) of the GDPR. TSB processes personal data based on the following legal grounds:

- Processing of personal data for the purpose of fulfilling a contract (e.g., providing services related to electronic non-transferable prepaid tickets)
- Processing of personal data based on voluntary provision by the customer for the purpose of accessing certain Brno iD services or for easier customer contact in case of solving their issue
- Brno iD also offers services (e.g., tickets to the Zoo, Observatory, etc.) that do not require any personal data

Processing of personal data necessary for fulfilling legal obligations applicable to us is based primarily on the following legal regulations:

- Act no. 500/2004 Sb., Administrative Procedure Code as amended
- Act no. 499/2004 Sb., Archives and Records Service Act as amended
- Act no. 361/2000 Sb., Road Traffic Act as amended
- Act no. 111/1994 Sb., Road Transport Act as amended
- Act no. 266/1994 Sb., Railways Act as amended
- Act no. 127/2005 Sb., Electronic Communications Act as amended

TO WHICH CATEGORIES OF RECIPIENTS CAN THE PROCESSED PERSONAL DATA BE TRANSFERRED?

TSB may provide processed personal data to other entities when necessary to offer a Brno iD service, based on your request, involving third-party service provision within the Brno iD environment. Customers are always informed (at the point of access to the specific service within Brno iD) about which data and to which entity will be transferred in connection with the service utilization. This includes whether any personal data are transferred as part of a specific function or service and thus, whether and what personal data are required by the service or function.

For instance, for waste payment services, related personal data are transferred to the Environmental Department of the Brno City Municipality, which manages the municipal waste fee in Brno. Similarly, for online student status verification with universities or ISIC card operator, personal data are transferred to the chosen institution to determine eligibility for student status.

Personal data of electronic ticket holders are automatically transferred to KORDIS JMK, a.s. Transportation providers within the South Moravian Integrated Transport System (IDS JMK) recognize IDS JMK tickets, including those issued electronically by TSB-operated Brno iD, across their services. To facilitate mutual recognition of tickets, ensure their sale, verify validity, handle complaints, process returns, enforce penalties for fare evasion, manage uniform sales and ticket administration, avoid data discrepancies between sellers, and allow passengers to manage their tickets in a unified system regardless of the ticket vendor, personal information of users who have purchased or intend to purchase a ticket and have agreed to the IDS JMK Transport Conditions is exchanged within the e-shops, sales, and control systems of IDS JMK. The common data controllers for personal data provided or obtained for the purpose of acquiring an IDS JMK ticket are the Brno City Transport Company (Dopravní podnik města Brna, a.s.) and KORDIS JMK, a.s., the latter being the coordinator of the Integrated Transport System of the South Moravian Region, overseeing sales for all transport providers within the system. It conducts daily calculations for single-use ticket coverage, distributes information necessary for verifying ticket validity, and facilitates ticket sales through its own e-shop. Personal data processors include transportation providers operating

IDS JMK routes and entities conducting transportation inspections. For the purposes of selling tickets or verifying their validity, personal data may be shared with other entities, solely for this purpose. A list of transportation providers and other personal data processors is available on www.idsjmk.cz.

To enhance accessibility and coverage of verification locations, employees of third-party entities may also access customer personal data. Currently, such entities include the Brno City Transport Company (Dopravní podnik města Brna, a.s.) and KORDIS JMK, a.s., offering Brno iD customer personal data verification at their branches.

Within legal limits, TSB may provide personal data to government agencies, courts, criminal proceedings bodies, administrative bodies, etc.

DOES BRNO iD TRANSFER PERSONAL DATA TO A THIRD COUNTRY OR INTERNATIONAL ORGANIZATION?

TSB does not currently transfer processed personal data to recipients abroad.

WHAT FORM OF PROCESSING IS CONDUCTED?

Brno iD primarily processes personal data automatically in information systems, ensuring a high level of technical, organizational, and personnel security. TSB does not engage in automated decision-making or profiling.

The information systems used by Brno iD for processing personal data are secured and audited to guarantee their resilience, reliability, confidentiality, and availability of information.

Employees or persons in a similar relation to TSB who handle personal data are trained in data protection and are bound by confidentiality.

FOR HOW LONG DOES BRNO iD PROCESS PERSONAL DATA?

In line with data minimization principles, Brno iD processes only the personal data necessary for service provision. It's up to the Brno iD customer to decide which data to provide (thus accessing all services for which they meet the required data conditions). Requests for the deletion of personal data not removable by the customer themselves (e.g., verified personal data) or for account cancellation can be made at the Brno iD Customer Center. If the deletion of data leads to the unavailability of necessary data for some services, these services and products may be blocked (for example, non-transferable prepaid tickets cannot be used without providing related personal data, which are directly conditional for these specific products).

WHAT RIGHTS DO YOU HAVE AND HOW CAN YOU EXERCISE THEM?

You can exercise your rights, for example, by sending a written request to our contact address, sending a message to our data mailbox, or emailing with a qualified electronic signature.

If the request is submitted in another form, you may be asked to prove your identity by presenting an ID card or to submit the request anew.

Responses and statements are provided by TSB free of charge, except in cases of repeated or unreasonable requests.

TSB will respond within one month at the latest.

- Right to access

You have the right to find out if and what personal data about you are being processed, for how long, and for what purpose. Additionally, whether they are being passed on to other recipients. Primarily, you always have access to and an overview of the processed personal data fully available online in the "My Account" section of your customer account at Brno iD, where there is a summary of all currently valid personal data recorded for that customer account.

- Right to rectification

You have the right to correct inaccurate personal data or complete incomplete data.

- Right to erasure of personal data or account cancellation

You can request the deletion of personal data or the complete cancellation of the account, but only if there is no legal ground for processing. You do not have the right to demand TSB erase processed personal data during the period of their lawful processing.

- Right to data portability

The right to data portability includes the data subject's right to request their personal data processed by TSB in a structured, commonly used, and machine-readable format for the purpose of transferring it to another controller, or, where technically feasible, to have it directly transferred to another controller. Many Brno iD services automatically include this right when you acquire products from third parties through Brno iD that require some personal data (for example, payments for waste services cannot be made without providing personal data). This right can only be exercised provided that the processing is based on the legal ground of contract fulfillment and is carried out by TSB through an information system (automatically).

- Right to object to processing personal data

You can object to the processing of your personal data by TSB if it's based on the legal ground of "legitimate interests of the controller" and if it threatens your fundamental rights and freedoms.

- Additional rights

TSB informs you that you have the right to lodge a complaint with the Data Protection Authority under the conditions set by Article 77 of the GDPR.

Thank you for trusting us with your personal data.
Your Brno iD