

Privacy Notice To Employees & Applicants

In accordance with articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (General Data Protection Regulation – hereinafter referred to as the “GDPR”), the Company provides the following information relating to the processing of personal contact data of its employees or candidates and job applicants that the Data Controller have received directly from the Data Subjects, as defined in article 4 of the GDPR, or from publicly available sources (hereinafter “Personal Data”).

Personal Data Controller

The Personal Data Controller is Safe Bag Czech Republic s.r.o., registered office at Belgická 115/40, Vinohrady, 120 00 Prague 2, ID no.: 14202247 (hereinafter the “Data Controller” or the “Company”), which can be contacted at privacy.cz@safe-bag.com for matters related to personal data.

Purpose of Processing

The Personal Data will be processed to ensure the efficiency and security of the Company, of its assets and its corporate resources and, in particular, for the following purposes (“Permitted Purposes”):

- Drafting, entering into and performing employment contracts, making decisions about who to offer initial employment to, subsequent internal appointments, promotions and similar activities;
- General HR and personnel administration and planning, including payroll and benefits, travel and time-keeping, training and development, performance management, absence management, substitution, emergency contact, grievance and disciplinary procedures, providing of equal opportunity and business continuity planning, relocation and business travel purposes, sick leaves and maternity leaves;
- Analysis and evaluation of performance and allocation of premiums according to productivity levels; to such aim, our employees’ performance may be monitored via appropriate software (see below);
- Organizational and efficiency purposes, including purchasing and general affairs, planning, controlling, budgeting, benchmarking, restructuring, merger and acquisition and marketing promotion activities;
- Security purposes, including managing access to the airport and providing and issuing of airport passes, maintaining and protecting the Company’s property, ensuring integrity and security of and controlling access to the Company’s premises, facilities, IT and communication systems, platforms and secured websites and applications websites and other systems or facilities (including camera and other systems), investigating, preventing and detecting security threats, fraud, theft or other criminal or malicious activities;

- Ensuring the safety of work and health at the workplace and including ensuring the safety of the end customer in the investigation of work accidents, damage events or possible errors in production through a camera system, and subsequently dealing with local authorities or organizations, doctors, relocation agencies, travel agents and other service providers;
- Legal documentation purposes, to ensure compliance with legal documentation and document retention obligations (such as record keeping obligations).

Legal Basis For Processing

The legal bases for processing of personal data are set forth in Article 6 of the GDPR. Depending on the above Permitted Purposes for which the Company uses personal data, the processing is either necessary for entering into and performing the employment contracts, or other agreements with the employer, or is necessary for compliance with employer's legal obligations (e.g. to keep salary records or records for tax purposes) or necessary for purposes of the Company's legitimate interest or those of any third party recipients that receive the Data Subjects' personal data, always provided that such interests are not overridden by the interests or fundamental rights and freedoms of the Data Subjects.

How Personal Data Are Collected

The Company collects Personal Data about the Data Subject in a variety of ways and this will usually start when the Data Controller undertakes a recruitment exercise where the data is collected from the job applicants. This includes the information normally included in a CV or a recruitment cover letter, or notes made by the Company's recruiting officers during a recruitment interview. Further information will be collected directly from the Data Subjects, as defined in article 4 of the GDPR, when they complete forms at the start of their employment, for example, bank and next of kin details. Other details may be collected directly from the Data Subject in the form of official documentation such as ID, driving licence, passport or other right to work evidence.

In some cases, the Company will collect data about the Data Subjects from third parties, such as employment agencies, former employers when gathering references or credit reference agencies. Personal data is kept in personnel files or within the Company's HR and IT systems.

Performance Monitoring

A software installed on the wrapping machines allows to acquire data on the performance of each operator, taking into account:

- Three-letter code assigned to operator by HR
- Number of sales
- Type of product sold
- Time and duration of operational breaks and personal breaks
- Average time per wrapping

- Average consumption (in meters) of material used for each wrapping
- Alerts resulting from deviation from quality standards (material consumed by type of luggage, average, quantity of film breaks, quantity of receipts cancelled, shut down of the machine; abnormal deviations of the weight of the baggage during wrapping, between the first and second wrapping phases; delay of 2 minutes from the end of the last winding phase if there are no further wrapping; trend of mistakes made)

Compulsory or optional nature of processing

The provision by the Data Subject of certain Personal Data to the Data Controller might be compulsory to meet the requirements of legal and contractual obligations and, therefore, any refusal to provide them in whole or in part may make it impossible for the Data Controller to execute the contract that the data subject is party to or to correctly carry out all obligations, such as those of an accounting, administrative, and fiscal nature connected to the contractual relationship.

Personal Data Recipients

Exclusively for the Permitted Purposes, the data will be made known not only to the competent internal personnel units, pursuant to article 29 of the GDPR, but also to the following categories of subjects:

- Persons, companies or professional firms that carry out assistance and advisory services or activities for the Data Controller, specifically but not exclusively in reference to matters involving accounting, administrative, legal, tax, tech and financial management;
- Banking institutions;
- Public or governmental bodies such as regulatory or enforcement authorities, attorneys or courts where the Company is required to do so by applicable law or regulation or at their request if legally permitted and necessary to comply with a legal obligation or for the establishment, exercise or defense of legal claims.
- To parties that need access to the data for purposes ancillary to the relationship between the Data Subject and the Company, to the extent strictly necessary to perform the auxiliary tasks entrusted to them (*e.g.* credit institutions, insurance companies insurance companies; certification bodies, accommodation facilities, airlines, mobile phone companies).
- To third parties as part of a Company sale or restructure.
- Social networks managers.

Storage of Personal Data

In line with data protection principles, the Company only keeps Personal Data for as long as it needs it for, which will be at least for:

- the duration of the employment contract + 10 years for employees

- 10 years for job applicants

Transfer of Personal Data

The Company will store and process Personal Data within the European Economic Area. The Data Controller is a globally active enterprise, so in the course of its business activities, it may transfer personal data also to recipients in countries outside of the European Economic Area (“third countries”), in which applicable laws do not offer the same level of data protection as the laws of Czech Republic. When doing so the Company will comply with applicable data protection requirements and take appropriate safeguards to ensure the security and integrity of Personal Data. The Data Subject may contact the Company at any moment to obtain further information on such safeguards.

Data Subjects’ rights

Pursuant to the EU General Data Protection Regulation (“GDPR”), the Data Subjects have certain rights in relation to the data that the Company holds on them. These are:

- requesting access to their personal data pursuant to GDPR Section 15
- revoking any consent given to the processing of their personal data - GDPR Section 7
- requesting a rectification (GDPR Section 16), restriction of processing (GDPR Section 18), or cancellation of their personal data (GDPR Section 21)
- objecting to processing (GDPR Section 20) of their personal data
- requesting not to be subject to a decision based solely on automated processing, including profiling (GDPR Section 22)
- requesting the transfer of the data that the Company holds on the Data Subjects for their own purposes
- obtaining information in the case of a data breach (GDPR Section 34)
- filing a complaint with the Supervisory Authority of Czech Republic <https://www.uoou.cz/en/> (GDPR Section 77).

If the Data subjects wish to exercise any of the rights explained above, it is possible to contact privacy.cz@safe-bag.com.

Supervisory Authority

The Office for Personal Data Protection in Czech Republic (<https://www.uoou.cz/en/>) has its registered office in: Pplk. Sochora 27, 170 00 Praha 7, Czech Republic.