

In Brno on 23.03.2022

Our ref. No.:

Information on Personal Data Processing for Identity Card Holders at Mendel University in Brno

Mendel University in Brno, reg. No. 62156489, with its registered office at Zemědělská 1665/1, 613 00 Brno, Czech Republic (hereinafter '**controller**' or '**MENDELU**'), hereby fulfils its information obligation towards data subjects (hereinafter '**data subject**') whose personal data can be processed in connection with the issuance of identity cards by the controller. A **data subject** can mean a student at MENDELU, an employee of MENDELU, a participant in a lifelong learning programme at MENDELU, or a participant in educational activities provided by MENDELU (e.g. a student from a different higher education institution who has joined a study stay at MENDELU). The controller is obliged to inform the affected data subjects of the conditions under which their personal data is processed pursuant to Art. 13 of 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, and repealing Directive 95/46/ES (General Data Protection Regulation, hereinafter '**GDPR**').

Contact details of the personal data controller

The university's registered office: Zemědělská 1, Brno

Name of the university: Mendel University in Brno
MENDELU Rectorate: Building A
Mailing address: Zemědělská 1665/1, 613 00 Brno, Czech Republic
Telephone: +420 545 131 111
Email: info@mendelu.cz
Website: www.mendelu.cz
Registration No.: 62156489
VAT No.: CZ62156489
Data box ID: 85ij9bs

Contact details of the Department of Scientific and Pedagogical Information and Services

Ing. Věra Svobodová
Mendel University in Brno, Zemědělská 1665/5, Brno 613 00
Contact phone number: +420 545 135 041
Contact email: vera.svobodova@mendelu.cz

Contact details of the data protection officer

Mgr. Martin Pernica, Ph.D.
Mendel University in Brno, Zemědělská 1665/1, Brno 613 00
Contact email: dpo@mendelu.cz

The purposes of personal data processing

The controller processes the personal data of the above categories of data subjects in order to issue and administer MENDELU identity cards (certificates) pursuant to:

– Art. 6(1)(c) of the GDPR, which stipulates that *processing is necessary for compliance with a legal obligation to which the controller is subject*. This is primarily compliance with the statutory obligation of the controller pursuant to Section 57(1)(a) of Act No. 111/1998 Coll., regulating Higher Education Institutions and on Amendments and

Supplements to some other Acts, as amended, setting forth that MENDELU is obliged to issue student identity cards. (This provision only applies to students),

– Art. 6(1)(f) of the GDPR, which stipulates that *processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of identity card holders who, as data subjects, require protection of their personal data*. The controller processes the personal data of identity card holders for the purposes verifying the identity of the identity card holder, administration and keeping records of access to MENDELU's premises, buildings and individual spaces and to enhance the protection of property either owned or managed by MENDELU. (This provision applies to all above categories of data subjects).

The processing of the personal data of the above (categories of) data subjects for a different purpose is only possible if the identity card holder agrees to it, or if there are other reasons arising from the GDPR.

The personal data of identity card holders are processed by the controller to the following extent

- The name, surname, date of birth, student status, the mode of study, email, the card's validity from/to, the card's status, the card's ID number, a photograph, gender, the preferred language of communication.

When processing personal data, no automatic decision-making, including profiling takes place which would result in the carrying out of operations or making decisions that might interfere with the rights and legitimate interests of data subjects within the meaning of Art. 22 of the GDPR.

The means of personal data processing

When issuing and administering MENDELU identity cards, the controller processes the personal data of data subjects in both electronic and paper document forms.

Period of personal data retention

The controller processes the personal data of data subjects during the period when the respective relationship of the data subject towards MENDELU is active, and all other procedures are governed by special legislation, primarily Act No. 499/2004 Coll., on Archiving and Records Management, as amended.

Transfers of personal data

MENDELU does not share any personal data of its identity card holders with any third parties. However, the above does not apply to holders of ISIC, ITIC and ALIVE identity cards.

An overview of the rights pertaining to personal data protection

Data subjects – MENDELU graduates have the following rights, provided their identity has been verified:

- the right to access their personal data under the conditions defined in Art. 15 of the GDPR, which entitles them to know whether and, if relevant, what data about them MENDELU processes and keeps, the purpose, legal basis, manner and duration of processing and information on the recipients who have access to their personal data,
- the right to rectify inaccurate or incomplete data under the conditions defined in Art. 16 of the GDPR. Data subjects are obliged to notify MENDELU of any changes to their personal data and provide documents showing that such changes have taken place,
- the right to erasure under the conditions defined in Art. 17 of the GDPR. This right is only applicable when MENDELU cannot prove legitimate reasons for processing the personal data of data subjects,
- the right to restrict processing under the conditions defined in Art. 18 of the GDPR. This right is only applicable when a data subject contests the accuracy of their personal data, the reasons for and purposes of their processing, or lodges an objection against their processing,

- the right to be notified of the rectification, erasure or restriction of processing under the conditions defined in Art. 19 of the GDPR, by MENDELU as the controller of personal data, unless this proves impossible or involves a disproportionate amount of effort,
- the right to portability of personal data provided based on consent or a contract and is subject to automated processing at MENDELU, under the conditions defined in Art. 20 of the GDPR. This includes the right to receive personal data in a structured, commonly used and machine-readable format and the right to request that MENDELU transmit this data to another controller designated by you, provided this is technically feasible. However, the controller does not perform automated processing of the personal data provided,
- the right to object to personal data processing, only in cases where processing is carried out in the public interest or on the basis of the legitimate interests of the controller under the conditions defined in Art. 21 of the GDPR,
- the right not to be subject to any decision-making based on automated processing, including profiling, only under the conditions defined in Art. 22 in the GDPR. However, the controller does not perform any fully automated decision-making and processing without human involvement, which would have legal consequences or other significant impacts for data subjects,
- the right to lodge a complaint with the supervisory authority, which in the Czech Republic is the Office for Personal Data Protection, pursuant to Art. 77 of the GDPR.

Data subjects can exercise their rights in the following ways

- in paper form via a letter bearing the handwritten verified signature of the data subject and delivered to the controller's address at Mendel University in Brno, Zemědělská 1665/1, 613 00 Brno, using a mail service provider,
- electronically via a data message delivered to the controller's data box ID 85ij9bs,
- electronically via an email that includes the qualified or advanced electronic signature of the data subject, sent to the electronic filing office of the controller at podatelna@mendelu.cz,
- by personally delivering a written request to the filing office of the controller, provided that the data subject's identity is verified using their national identity card or travel document certified by an authorised employee of the controller.

Identification cards in the ISIC, ITIC and ALIVE variants

For the *purpose* of ensuring the issuance of **ISIC, ITIC and ALIVE cards**, activation and making sure that the **digital versions of these cards** are in working order, the provision of benefits associated with specific cards, GTS ALIVE s.r.o., reg. No. 26193272 with its registered office at Na Maninách 1092/20, 170 00 Prague 7 (hereinafter '**GTS**') is also a *personal data controller* alongside Mendel University in Brno. The legal basis for processing is, in this case, Art. 6(1)(b) of the GDPR, under which *processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract*.

GTS is *the personal data controller* for the *purpose* of setting up **digital accounts** for users, linked to the individual ISIC, ITIC and ALIVE cards. The legal basis for processing is, in this case, Art. 6(1)(a) of the GDPR, *the data subject has given consent to the processing of his/her personal data for one or more specific purposes*.

GTS is entitled to conclude a contract on personal data processing with another processor. This *other processor* is BOOTIQ s.r.o., reg. No.: 29155495, with its registered office at Hybernská 1007/20, Nové Město, 110 00 Prague 1.

The personal data of identity card holders – student identity cards in the ISIC and ALIVE variants, *is processed to the following extent*: the card's serial number, the type of card, the form of card, the card's status, the card's validity from/to, the type of RFID used in the card's chip, UIS RFID in the card's chip (the chip number), the name and surname of the card holder, the date of birth of the card holder, a photograph of the card holder, student status, the mode of study, graduate status, email, gender, the preferred language of communication with the card holder.

The personal data of identity card holders – employee identity cards in the ITIC and ALIVE variants, is processed to the following extent: the card's serial number, the type of card, the card's status, the card's validity from/to, the type of RFID used in the card's chip, UIS RFID in the card's chip (the chip number), the name and surname of the card holder, the date of birth of the card holder, a photograph of the card holder, email, gender, the preferred language of communication with the card holder.

The period of processing of the personal data of identity card holders – student identity cards in the ISIC and ALIVE variants, lasts throughout the duration of study, with a possible extension of study in accordance with MENDELU's Study and Examination Regulation, but no longer than 9 years from when the personal data was first stored in relation to the particular purpose of processing. You can find the rules for the use of the cards at <https://www.isic.cz/en/>.

The period of processing of the personal data of identity card holders – employee identity cards in the ITIC and ALIVE variants, lasts throughout the duration of their employment contract, but no longer than 9 years from when the personal data was first stored in relation to the particular purpose of processing. You can find the rules for the use of the cards at <https://www.isic.cz/en/>.

The period of processing of the personal data of ISIC and ALIVE digital account users lasts throughout the existence of their accounts until their data retention period expires, and the personal data processed in relation to the issuance and administration of the ISIC or ALIVE cards; if the data subject has given consent allowing GTS to process their personal data for other purposes associated with the use of other services provided by GTS, then until withdrawal of their consent.

The period of processing of the personal data of ITIC and ALIVE digital account users lasts throughout the existence of their accounts until their data retention period expires, and the personal data processed in relation to the issuance and administration of the ITIC or ALIVE cards; if the data subject has given consent allowing GTS to process their personal data for other purposes associated with the use of other services provided by GTS, then until withdrawal of their consent.

When ISIC, ITIC and ALIVE identity cards are issued to data subjects upon their request, MENDELU will share the personal data of the holders of these identity cards with GTS. GTS can allow other companies (including those outside the EU) access to the personal data of the holders of ISIC, ITIC and ALIVE identity cards). Holders of ISIC, ITIC and ALIVE identity cards) are entitled to use the services provided by GTS and its contractual partners.

The rights of data subjects and exercising these rights towards the controller GTS

Identity cards in the ISIC, ITIC and ALIVE variants and digital accounts are issued upon a request made by a data subject (a MENDELU student, a MENDELU employee and a participant in a lifelong learning programme at MENDELU, or a participant in educational activities provided by MENDELU). Data subjects provide their personal data on a voluntary basis. A card can be invalidated at any time following the procedure set out in the Principles of Personal Data Protection prepared by GTS [<https://www.isic.cz/en/about-us/legal-documents/zasady-ochrany-osobnich-udaju/>], hereinafter the 'Principles'.

Data subjects are entitled to access, rectify, erase and restrict personal data processing, raise an objection to processing and have the right to data portability in accordance with the Principles. Information on how data subjects can exercise their rights is defined in the Principles. The conditions for the use of certificates and cards issued by GTS (consumer rights) are regulated by the Rules for the Use of Certificates and Cards [<https://www.isic.cz/o-nas/dokumenty/pravidla-pouziti-prukazu-a-karet/>].