

## Information on Processing of Personal Data of Contractors

### 1. Introduction

**Coca-Cola HBC Česko a Slovensko, s.r.o.**, Company ID: 41189698, with its registered seat at Prague 9 - Kyje, Českobrodská 1329, Postal Code 19821, Czech Republic, registered in the Commercial Register maintained by the Municipal Court in Prague, Section C, Insert 3595 (the “**Controller**” or “**we**”) processes as a controller personal data of its existing and potential contractors who are natural persons as well as of the contact persons of the contractor communicated to the Controller (“**data subjects**” or “**you**”).

Processing of your personal data is carried out in accordance with generally applicable legislation, particularly the 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 (“**GDPR**”).

On the subject of personal data processing, the data subjects may contact directly the Controller. In order to strengthen your rights and guarantees with regard to the processing of personal data, the Controller also has designated the data protection officer who is available to you via e-mail [pravnici.cz@cchellenic.com](mailto:pravnici.cz@cchellenic.com).

### 2. What kind of personal data we process

The Controller shall process identification and contact details of the data subject and data collected by the Controller during the pre-contractual relations and when performing the contract entered into between the Controller and the respective contractor (the “**contract**”) as well as personal data provided to the Controller by the data subjects.

We will process only personal data that are adequate, relevant and limited to the scope necessary with regard to the purpose of the processing.

### 3. Why do we process your personal data

We process your personal data for the following purposes:

- (a) managing the tender process and negotiating a contract with the potential contractor based on Article 6 (1) b) of GDPR and Article 6 (1) f) of GDPR;
- (b) performance of the concluded contract based on Article 6 (1) b) of GDPR;
- (c) complying with our legal obligation under the generally applicable legislation based on Article 6 (1) c) of GDPR (*i.e. obligation of the Controller to maintain accounting and tax documents*);
- (d) establishing, exercising or defending our legal claims based on Article 6 (1) f) of GDPR;
- (e) if you have consented to our use of your personal data, we will process your personal data for the purposes stated in such consent, based on Article 6 (1) a) of GDPR.

The provision of personal data by the data subject is a contractual requirement. The data subject has no statutory obligation to provide personal data; however, the Controller needs the data to conclude and perform the contract.

### 4. Retention period

Personal data shall be processed for no longer than is necessary for the purpose of their processing. If we process your personal data for two or more purposes, we will retain it until the purpose with the latest period expires. However, we will stop using it for the purpose with a shorter period once that period expires. The Controller uses the following criteria to determine the processing period of personal data:

- (a) for the purpose of negotiating a contract we will process your personal data from the beginning of such negotiation until the relevant tender process is terminated;
- (b) for the purpose of performing the contract your personal data will be processed until termination of all obligations under the respective contract;

- (c) for the purpose of complying with our legal obligation we will process your personal data for the duration of such legal obligation under the generally applicable legislation;
- (d) for the purpose of establishing, exercising or defending our legal claims we may process your personal data until the lapse of 5th calendar year following the termination of (a) relevant selection procedure or (b) if the contract was concluded, all obligations under the contract. In case of judicial, administrative or other proceedings dealing with our mutual rights and / or obligations, the processing of personal data will never end before the termination of such proceedings;
- (e) personal data processed based on your consent will be processed until you withdraw such consent, unless we determine a shorter processing period when the consent is given.

No later than by the end of the calendar quarter following the expiry of the processing period the relevant personal data which no longer need to be processed shall be anonymized or destroyed (by shredding or other means preventing unauthorized disclosure).

## **5. Who do we disclose your personal data to**

The Controller will disclose personal data of the data subjects to the respective state bodies and authorities to whom we provide personal data based on generally applicable legislation.

We will further disclose your personal data to our verified business partners that process personal data for us as processors based on agreement on personal data processing. These processors act as our suppliers developing and maintaining functional and secure systems or supplying us with necessary software solutions or other services required to process your personal data. Upon request, we will provide you with information on processors participating in processing of your personal data. Your personal data will also be disclosed to our employees.

Finally, the personal data of data subjects will be shared within the Controller group for internal administrative purposes. The list of Controller group members is available on <https://coca-colahellenic.com/en/operations/markets/markets-overview/>. Data subject acknowledges that the list of Controller group members may change in time.

## **6. Transfer of personal data to third countries**

If we disclose your personal data to recipients from countries outside of the European Economic Area (EEA), the data protection laws in such countries may be of a lower standard than in the EEA. In such cases, we will ensure that respective guarantees are followed when your personal data are being processed.

In case of certain countries outside the EEA we may ask you for consent to the transfer of your personal data or make the transfer subject to European Commission approved standard contractual terms. This does not apply if we are permitted under generally applicable legislation to make such transfer of personal data without these formalities.

## **7. Your rights**

In connection with the processing of your personal data, you have a number of rights. However, some exceptions may apply to the exercise of such rights and, therefore, you may not be able to exercise them in all situations. If you legitimately exercise your rights, we will take the required action without undue delay and within one month at the latest (this period may be extended for another two months in justified cases). Overview of the data subject's rights:

- Right of access                      You have a right to be provided with access to data processed by us.
- Right to rectification                You can ask us to rectify inaccurate personal data.
- Right to erasure                      Under circumstances set forth in Article 17 of the GDPR, you can ask us to erase your personal data.
- Right to withdraw consent        If we process your personal data based on your consent with processing, you may withdraw your consent at any time to prevent

further processing for the purpose stated in such consent. Please note that withdrawal of your consent will not affect the lawfulness of any prior processing.

- Right to object  
If we process your personal data based on our legitimate interests, you have a right to raise an objection against such processing.
- Right to restriction of processing  
In certain cases, you can ask us to restrict the processing (*for example until your objection is solved*).
- Right to data portability  
You can ask us to transfer to you or a third party personal data processed electronically and based on a contract or your consent.
- Right to request a remedy and right to lodge a complaint  
If you assume that processing of your personal data is in breach with legal regulation, please contact us and we will immediately remedy the situation. This is without prejudice to your right to lodge a complaint regarding the processing directly with the Office for Personal Data Protection (in Czech Úřad pro ochranu osobních údajů, [www.uouu.cz](http://www.uouu.cz)).