



## PRIVACY POLICY

### INFORMATION FOR BUSINESS PARTNERS, EXTERNAL STAFF AND VISITORS

#### INTRODUCTORY INFORMATION

Dear business partners and visitors,

The aim of this Policy is to inform you about how **Mondi Štětí a.s** (hereinafter referred to as “**MONDI**”) collects, processes, uses and transmits your personal data (hereinafter jointly referred to as “**personal data processing**”).

Personal data means information relating to a particular individual who can be identified on the basis of such information, possibly in conjunction with other information.

The most common examples of personal data processed by MONDI during day-to-day business activities are identification data (in particular, name, surname and job title) and contact details (in particular, e-mail address and telephone number) of business partners, their employees, representatives or other contact persons (hereinafter jointly referred to as “**business partners**”), as well as records of visitors and external staff within the Mondí site (contractors’ staff, tenants, etc.).

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#### Who is your personal data controller?

The data controller is **Mondi Štětí a.s.**, Company Registration Number: 26161516, with its registered office in Štětí, Litoměřická 272, Post code 411 08, registered in the Commercial register under File Number B. 1371 maintained by the Regional Court in Ústí nad Labem.

MONDI determines how and for what purposes your personal data will be processed. The contact details of MONDI and the **Data Protection Officer** designated by us can be found in “**Questions and contact details**” below.

MONDI and other related companies within MONDI Group are herein jointly referred to as “**MONDI Group**”.

## What personal data is processed by Mondi and for what purposes?

The below table shows the types of personal data processed by MONDI, as well as reasons and purposes for its processing.

### a) Business partners

Personal data (categories and examples)	Purpose of processing	Legal basis of processing
<u>Identification and contact details</u> (in particular, your name, surname, job title, company, telephone number and email address)	<ul style="list-style-type: none"> <li>Contracting and performing a particular contract and related commercial communication</li> <li>Sending of commercial communications to our business partners</li> <li>Approaching customers through direct marketing</li> </ul>	<ul style="list-style-type: none"> <li>Concluding and performing a contract</li> <li>Vital interest of the company in ensuring communication with business partners</li> <li>Consent of the person concerned (including to business card handover) or a consent given to the sending of commercial communications</li> <li>Vital interest in approaching customers through direct marketing</li> </ul>
<u>Payment and delivery details</u> (for example, account number and delivery address).	<ul style="list-style-type: none"> <li>Concluding and performing a particular contract with our business partners</li> </ul>	<ul style="list-style-type: none"> <li>Concluding and performing a contract.</li> </ul>

### b) External staff (contractors' employees, tenants, etc.)

Personal data (categories and examples)	Purpose of processing	Legal basis of processing
<u>Identification and contact details:</u> <ul style="list-style-type: none"> <li>Name, surname, job title, company and purpose of the visit</li> <li>Photograph on the entry card (external staff)</li> <li>Telephone number and email address</li> </ul>	<ul style="list-style-type: none"> <li>Keeping records of visitors and external staff within the company site</li> <li>Keeping records of telecommunication service users</li> </ul>	<ul style="list-style-type: none"> <li>Vital interest of the company in controlling access and in assets protection</li> <li>Consent of external staff to the processing of photographs for entry card purposes.</li> </ul>
<u>Safety data:</u> <ul style="list-style-type: none"> <li>Data from the CCTV and access control system of the company</li> <li>Data for security and OHS purposes (entry training, alcohol testing, compliance with safety rules within the site including speed limits and use of safety belts, dedicated technical equipment handling authorisations, investigating work-related injuries within the company site)</li> </ul>	<ul style="list-style-type: none"> <li>Protection of the company's assets, providing safety and controlling access to the company site.</li> <li>Ensuring OHS and complying with safety rules and guidelines.</li> </ul>	<ul style="list-style-type: none"> <li>The company's vital interest in the protection of its assets, ensuring safety and control of the company site access.</li> <li>Complying with mandatory OHS-related obligations.</li> <li>Performing contracts with external contractors and tenants.</li> </ul>

Detailed information on the CCTV system can be found in Annex 1.		
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### c) Visitors

Personal data (categories and examples)	Purpose of processing	Legal basis of processing
<u>Identification and descriptive data</u> <ul style="list-style-type: none"> <li>Name, surname, company and purpose of the visit</li> <li>Keeping records of entries to/exits from the company site</li> <li>Records from the CCTV system (see <u>Annex 1</u>).</li> </ul>	<ul style="list-style-type: none"> <li>Keeping records of visitors within the company site</li> </ul>	<ul style="list-style-type: none"> <li>The company's vital interest in controlling entry and protecting its assets</li> </ul>

### From which sources does MONDI obtain your personal data?

MONDI acquires personal data that is subsequently processed directly from its business partners and/or from publicly available resources (e.g., OR or ARES), from business partners and other people visiting MONDI or from within MONDI Group.

Other data is obtained from our access and attendance system, CCTV system or from our partners providing us with security, training or OHS-related services.

### Do we share your personal data with other persons?

#### a) External service providers

MONDI uses external service providers that provide the company with, in particular, accounting services, management of receivables, marketing or site security. In order to be able to fulfil their obligations, they need to be provided with certain personal data of our business partners, external staff and visitors and process it for us.

External service providers have MONDI's authorisation, providing sufficient guarantees with respect to business partners' personal data confidentiality and protection. MONDI has written personal data processing agreements with all these providers where the providers have committed themselves to protect personal data and to comply with MONDI personal data protection standards.

#### b) MONDI Group companies

Personal data on business partners can be shared by MONDI within MONDI Group (for more detailed information on Group members, please visit the website <https://www.mondigroup.com>). Business partners' personal data is shared only if the knowledge of this data is needed and this data is shared only with selected MONDI Group employees to perform tasks within their job responsibilities.

The access rights across MONDI Group companies are limited and they are granted only if a given person needs to know the relevant data based on their job title or work duties, with authorised employees being bound by confidentiality obligations.

#### c) Sharing data with third parties

MONDI is entitled or obliged, under certain circumstances, to share the personal data of its business partners or visitors with third parties other than the above service providers or MONDI Group companies, in compliance with the personal data protection legislation.

Such third parties include, in particular:

- police, public prosecutor's office,
- external consultants,
- external contractors' employers.

### **Does MONDI transfer your personal data to countries outside of the EEA?**

We may also transfer business partners' personal data to countries outside of the European Economic Area (EEA), for example, if it concerns a MONDI Group company based outside of the EEA, or if any of our service providers use staff or equipment located outside of the EEA.

With respect to the protection of your privacy, fundamental rights and freedoms and exercise of your rights, we have safety measures in place which ensure an adequate level of protection on the basis of standard EU contractual clauses arising from the European Commission's model clauses. For more detailed information on such transfer, do not hesitate to contact us (see "**Questions and contact details**" below).

### **How is your personal data secured?**

In order to ensure confidentiality, integrity and availability of your personal data, MONDI uses modern IT security systems. MONDI maintains appropriate safety technical and organisational measures against illegal or unauthorised processing of personal data and against accidental loss or damage of personal data.

Access to your personal data is only allowed to persons who need it in order to fulfil their work duties and who are bound by statutory or contractual confidentiality obligations.

### **How long will MONDI retain your personal data?**

MONDI retains your personal data for only as long as it is needed for the purposes for which it was collected and/or for the protection of MONDI's vital interests, or for the time for which the consent to the processing was granted.

If MONDI processes your data based on your consent, it shall do so for a period of ten years from the granting of the consent or until its revocation.

Information about MONDI's visitors shall be retained for a period of three years from the given visit.

### **What are your rights regarding the personal data processing?**

Under the above conditions, you can exercise all of the rights listed below, which are set out in legal regulations on personal data protection, in particular the General Data Protection Regulation (**GDPR**):

- right of access to personal data and the provision of further information on the processing of your personal data;
- right to correct inaccurate and incomplete personal data;
- right to obtain your personal data and transfer it to another controller;
- right to challenge the processing of your personal data;
- right to limit the processing of your personal data;
- right to erase your personal data;
- right to revoke at any time the consent to the processing;
- right to file a complaint with the supervisory authority (Personal Data Protection Office, [www.uoou.cz](http://www.uoou.cz)).

If we process your data for the purposes of (i) vital interests of MONDI or (ii.) for the purposes of direct marketing, you also have the right to challenge the personal data processing.

We will respond to your request for exercise of the rights within the statutory timeframe, usually within one month of receipt of the request. You will be notified should our response require a longer period of time.

### Questions and contact details

If you wish to exercise any of your rights in relation to the processing of your personal data or if you have any other questions or complaints about its processing, please contact our **Data Protection Officer** by mail, telephone or e-mail:

**Mondi Štětí a.s.**  
**Ilona Kolaříková**  
**Data Protection Officer**  
Štětí, Litoměřická 272, Post code 411 08

**e-mail: [ilona.kolarikova@mondigroup.com](mailto:ilona.kolarikova@mondigroup.com)**

**tel.: 416 803 954**

### Modifications to this Policy

MONDI may decide to modify or update this Policy. The current text of the Policy will always be available on the company's website:

<https://bozp.mondisteti.cz>

<https://woodyard.mondisteti.cz>

<https://www.woodaccept.cz>

## Annex 1



### Information on CCTV System

operated by

**Mondi Štětí a.s.,**

with its registered office at Litoměřická 272, 411 08 Štětí, Company Registration No.: 26161516  
(hereinafter referred to as the “**Controller**”)

#### **A. CCTV system description**

1. The purpose of operating a CCTV system and the purpose of processing personal data (recordings) obtained through CCTV is the protection of assets of the Controller, employees and other persons, protection against theft or other criminal activities, safety of employees and other persons in the monitored premises, as well as compliance with safety regulations.
2. The Controller’s CCTV system processes plain image recordings with no sound and no possibility to process personal biometric data.
3. CCTV system is installed and the recordings are processed in:
  - The Controller’s site at Litoměřická 272, 411 08 Štětí.
4. Within the CCTV system the Controller operates ca 50 external cameras and 300 internal cameras. More detailed information on the deployment of cameras and monitored premises within the site can be requested from the Controller.
5. The recordings obtained through CCTV can be provided solely to such recipients as the Police of the Czech Republic or other law enforcement bodies for the purposes of criminal proceedings and/or to administrative authorities for the purposes of infraction proceedings or other administrative delict proceedings.

The recordings can, for the above purposes, also be made available to authorised employees of third party contractors of the Controller or tenants having their seat within the Controller’s site provided that the recordings are related to their assets or staff.
6. Personal data is not transferred to countries outside of the European Economic Area.
7. The roads within the site are equipped with video-recording cameras which monitor vehicles to allow for checking the compliance with the speed limit and use of safety belts within the site.
8. The CCTV recordings are stored for a prescribed maximum of one week, according to the purpose and location of the cameras – for more information contact the Controller. Recordings are usually deleted by rewriting in the recorder.
9. The premises monitored by the CCTV system are visibly marked with a sign notifying of this fact including the name of the Controller and contact details.
10. The CCTV system operates either on a round-the-clock basis or based on movement detection.

#### **B. Rights of the Data Subject**

11. Under the prescribed terms and conditions, you can exercise any of the below listed rights as set out in legal regulations on personal data protection (mainly GDPR), in particular:
  - Right of access to personal data and the provision of further information on the processing of your personal data (i.e. the recordings made);

- Right to correct inaccurate and incomplete personal data;
  - Right to challenge the processing of your personal data;
  - Right to limit the processing of your personal data;
  - Right to erase your personal data;
  - Right to file a complaint to the supervisory authority (Personal Data Protection Office, [www.uoou.cz](http://www.uoou.cz)).
12. The Controller points out that the applicants shall not be provided with personal data/recordings that interfere in the rights of other persons. Should the requests be manifestly unfounded or inappropriate, the Controller is entitled to require compensation for the expenses incurred to provide the information, or to refuse such request.

**C. Other information and contact details of the Controller**

Should you have any queries or requests regarding the CCTV system and your rights, do not hesitate to use the following contact details:

**Mondi Štětí a.s.**

**Data Protection Officer**

**Ing. Ilona Kolaříková**

Litoměřická 272, 411 08 Štětí

e-mail: [ilona.kolarikova@mondigroup.com](mailto:ilona.kolarikova@mondigroup.com)

tel.: 416 803 954

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