Information on the processing of personal data of customers, business partners, job applicants and other external individuals by CAPEXUS s.r.o.

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Dear customers, business partners, visitors, and users of our information systems or applications, we would like to inform you that the protection of personal data is of the utmost importance to us and forms an integral part of fulfilling all our obligations. We therefore devote due attention to this matter and act in accordance with applicable legislation when ensuring the protection of personal data.

1. Details of the data controller and data protection officer

CAPEXUS s.r.o., Company Registration Number: 24131326, with its registered office at Moulíkova 3286/1b, Smíchov, 150 00 Prague 5, registered in the Commercial Register maintained by the Municipal Court in Prague under file number C 181449, **as the data controller** (hereinafter referred to as 'our company'), **hereby informs you of the principles and procedures governing the processing of your personal data** and of your rights relating to the protection of personal data, in accordance with Act No. 110/2019 Coll., on the processing of personal data, as amended (hereinafter referred to as 'ZZOÚ') and 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').

CAPEXUS s.r.o. is part of the ČEZ Group and, together with other subsidiaries of ČEZ ESCO, a.s., company registration number: 03592880, with its registered office at Duhová 1444/2, Michle, 140 00 Prague 4, acts as a joint controller of personal data within the meaning of Article 26(1) of the GDPR (hereinafter referred to as the "ESCO Group"). The companies of the ESCO Group, operating in the energy sector and related fields, as specifically listed **here**, have agreed to jointly determine the purposes and means of processing your personal data. The joint controllers have, amongst other things, set out in writing, through a transparent agreement, their respective shares of responsibility for fulfilling the obligations under the GDPR, in particular with regard to the exercise of data subjects' rights, and their obligations to provide the information specified in Articles 13 and 14, and have determined the extent of each company's liability for any damage caused during the protection and processing of your data.

Our company has not appointed a Data Protection Officer, as it does not meet the legal requirements for such an appointment under the GDPR and the Act on the Protection of Personal Data.

The information provided here is of a general legal and normative nature; it therefore does not form part of any contract and may be supplemented, in the course of our mutual communication, with details relating to a specific instance of personal data processing.

2. Personal data we process and how we process it

Our company and its contracted processors process, in accordance with the relevant legal basis and purpose of processing, the following categories of your personal data in particular:

a) **identification, authentication and address data:** first name, surname, academic title, date of birth, details from identity documents, permanent or temporary address, postal or other contact address, nationality, place and country of birth, registered office, company registration number, in rare cases personal identification number, handwritten signature and electronic signature;

b) **contact details:** telephone number, email address, data box ID;

c) **electronic data:** IP address, cookies, authentication certificates and electronic signature certificates, location data of the device used by the user, identifiers on social media and communication platforms;

d) **other personal data related to the contractual relationship:** bank account number, customer account number, SIPO reference number, access ID card number (if assigned to you), access ID and password for the user's personal account (if created);

e) in specific cases, **special categories of personal data**;

f) **personal data in visual recordings** – photographs, videos.

We may process your personal data both manually and automatically; however, when processing your data automatically, we do not use automated decision-making, including profiling, which could affect your rights.

3. Sources of personal data

Our company obtains your personal data primarily directly from you, particularly during negotiations to conclude a contract and subsequently during its performance, or from third parties who act as intermediaries in such negotiations. In such cases, we will inform you when the provision of personal data is necessary for the provision of a specific service or business collaboration, and when, conversely, it is voluntary but serves to facilitate mutual communication and streamline cooperation between you and our company.

Furthermore, we may obtain your personal data from public registers or from government authorities (for example, from the Trade Register, the Land Registry, the Insolvency Register or the Central Register of Enforcement Proceedings, etc.). Alternatively, in specific cases and in accordance with the relevant legislation, we may also obtain your personal data from non-public registers. We use data obtained from these sources solely for the purposes for which it was originally published.

4. Purposes, legal bases and duration of personal data processing

The legal basis for our processing of a data subject's personal data within the meaning of the GDPR may be:

A **Consent to the processing of personal data** for one or more specific purposes (Article 6(1)(a) of the GDPR);

We only collect your consent in specific cases where the processing of personal data cannot be carried out on another legal basis. In such situations, we will always inform you of the specific purpose, the retention period and other details relating to your consent. Granting consent is voluntary and you may withdraw it at any time, either by following the procedure set out for the specific instance of personal data processing in question, or by contacting our company at the email address info@capexus.cz or on the telephone number +420 602 257 600.

B **Processing is necessary for the performance** of **a contract** to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) of the GDPR);

In the context of this processing of personal data, you or your representative are a party to a contract being prepared or concluded; therefore, you have access to the content of the contract in question and, at the same time, to information relating to the processing of personal data. Alternatively, if the contract is concluded, for example, electronically via a specific website or web application, information regarding the processing of personal data for this specific purpose is always provided directly on the relevant website or within the application.

C **Processing is necessary for compliance** with **a legal obligation** to which the controller is subject (Article 6(1)(c) of the GDPR);

Our company is subject to numerous legal obligations under both Czech and European legislation. For greater clarity and to ensure you are better informed, the overview of specific purposes provided below sets out the key legal provisions governing areas of personal data processing based on compliance with a legal obligation.

D **Processing is necessary to protect the vital interests of the data subject or another natural person** (Article 6(1)(d) of the GDPR);

We do not normally process your personal data on this legal basis. Such processing of personal data could therefore only take place in entirely exceptional circumstances, of which we would inform you, including providing further details regarding any such processing of your personal data.

E **Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority** vested in the controller (Article 6(1)(e) of the GDPR);

We do not normally process your personal data on this legal basis. Such processing of personal data could therefore only take place in truly exceptional circumstances, of which we would inform you, including providing further details regarding any such processing of your personal data.

F **Processing is necessary for the purposes of the legitimate interests pursued by** the relevant controller or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child (Article 6(1)(f) of the GDPR).

Our company's legitimate interests include, in particular, ensuring the safety and health of persons and property, maintaining the necessary internal records (e.g. lists of qualifications of contractors' employees working on our premises, etc.), verifying the competence of key employees, preparing contracts with contractors, customers and employees, conducting marketing surveys, etc. In all cases of personal data processing based on the legal ground of the data controller's legitimate interest, we carry out a so-called balancing test. We will only proceed with the processing of personal data once the test has confirmed that our interests override the interests, rights and freedoms of the data subjects concerned. When processing personal data, we always take great care to ensure that the interests, rights and freedoms of data subjects are affected as little as possible.

An overview of the specific purposes, legal bases and periods for which personal data will be stored can be found in the attached table. The legal bases labelled A–F are defined above.

Purpose of personal data processing	Legal basis	Retention period	Legislation
Transport services – settlement of insurance claims	B C	5 years	Government Regulation No. 322/2025 Coll., on employers' obligations in the event of accidents at work Act No. 277/2009 Coll., on insurance
Recruitment	A B F	For the duration of the consent or up to 11 years	
Protection and processing of personal data	C F	up to 11 years	Regulation (EU) 2016/679, the General Data Protection Regulation
Fulfilment of obligations arising from health and safety at work regulations, the Fire Protection Act and environmental protection legislation	B C F	up to 45 years	Government Regulation No. 322/2025 Coll., on employers' obligations in the event of accidents at work Act No. 262/2006 Coll., the Labour Code Act No. 133/1985 Coll., on fire protection Act No. 541/2020 Coll., on waste and other environmental legislation Act No. 89/1995 Coll., on the State Statistical Service
Postal and document handling service	F	In accordance with the retention period for the relevant document	
Implementation of information and cyber security	B C F	Up to 11 years	Act No. 264/2025, the Cyber Security Act, as amended by relevant regulations
Exercise of rights and obligations under contracts	B F	10 years	
Concluding purchase and sale agreements	B	4 years	
Keeping records of workplace accidents	C	45 years	Government Regulation No. 322/2025 Coll., on employers' obligations in the event of workplace accidents Act No. 262/2006 Coll., the Labour Code
Use of cookies on the website	A C F	Processing on the user's device by type of cookie	Act No. 127/2005 Coll., on Electronic Communications
Processing of accounting records	C	11 years from the end of the financial year	Act No. 563/1991 Coll., on Accounting Act No. 280/2009 Coll., the Tax Code

5. Processors and recipients of personal data

To ensure the efficiency and professionalism of our processes, our company may, where justified, make your personal data available to its employees or contractual partners acting as personal data processors (on the basis of a personal data processing agreement or other legal instrument) or to contractual partners acting as joint controllers (on the basis of an agreement on the mutual rights and obligations of joint controllers or another legal instrument) or to another data controller acting as a recipient of personal data.

We require our contractual data processors to maintain a similar organisational and technical standard of personal data protection to that which we have uniformly established for the ESCO Group, including compliance with contractual terms relating to the processing of personal data (e.g. the obligation to use the personal data in question exclusively for the purposes for which it was provided, the prohibition on sharing the personal data provided with other data processors without our prior consent, etc.).

We verify that our requirements for the processing of the personal data provided are met by the relevant contractual processors prior to the conclusion of a personal data processing agreement (or other legal instrument), during its term, and even after its termination (in particular with regard to the erasure of the personal data provided, etc.).

Data processors

Category of processor	Activity
Security agencies	Ensuring the protection of life, health and property (through external security agencies).
Other companies within the ČEZ Group	The company is part of the ČEZ Group and, to ensure high-quality services, also collaborates with other SKČ companies, which are listed in more detail on the website cez/skupina-cez.
IT services and software suppliers	Development and maintenance of relevant IT systems, websites, systems for the electronic conduct of general meetings, the management and operation of electric mobility, etc.
Recruitment agencies	Recruitment and selection of suitable job applicants.
Postal and courier services	Postal services, including the delivery of money orders, as well as the transport of postal items and courier delivery of parcels.
Legal services and consultancy	Provision of legal services and advice.
Authorised representative	Acting and performing legal acts on behalf of the principal (in this case, ČEZ, a. s.) on the basis of a power of attorney or a contract.

Recipients of personal data

Your personal data may also be disclosed to third parties who are authorised to receive such personal data. These include, for example, tax, administrative or regulatory authorities.

Our company transfers personal data primarily to the following recipients:

- National Cyber and Information Security Agency
- Law enforcement authorities (courts, the Public Prosecutor's Office and the Police of the Czech Republic)
- Occupational health service providers
- Postal service operators
- Companies providing insurance services and claims settlement
- State Labour Inspection Office
- The Czech Republic's Labour Office
- Office for Personal Data Protection

6. Transfer of personal data to third countries

Our company processes your personal data, either directly or through its contracted processors, primarily within the Czech Republic or, where applicable, within the European Union (hereinafter referred to as the 'EU'), where the General Data Protection Regulation (GDPR), which is in force and effective throughout the European Union and the European Economic Area (hereinafter referred to as the 'EEA'), establishes the same conditions for the protection and security of personal data processing.

In exceptional cases, personal data is transferred to third countries or international organisations. In such cases, prior to the transfer of personal data, we assess whether the selected controller or processor provides appropriate safeguards and conditions, including the enforceability of your rights as data subjects, whilst also assessing the effectiveness of legal protection for personal data in the country concerned. The transfer of your personal data to third countries or international organisations may therefore only take place if the following conditions are met:

- there is a European Commission decision in respect of the selected third country or international organisation, under which that third country or international organisation has been found to ensure an adequate level of protection of personal data;
- the selected processor or sub-processor is able to provide appropriate organisational and technical safeguards, and in the country of that processor or sub-processor, data subjects' rights are enforceable and there is effective legal protection for data subjects.

Appropriate safeguards may include:

a) legally binding and enforceable instruments between public authorities or public bodies;
b) binding corporate rules;
c) standard data protection clauses adopted by the European Commission;
d) standard data protection clauses adopted by the relevant supervisory authority and approved by the European Commission;
e) an approved code of conduct containing binding and enforceable obligations on the data processor in a third country to implement appropriate safeguards, including in relation to the rights of data subjects;
f) an approved certification mechanism, together with binding and enforceable commitments by the third-country processor to implement appropriate safeguards, including in relation to the rights of data subjects.

7. Cookies and other processing in the digital environment

Our company's website uses cookies. In order for the website to display correctly, we need to collect what are known as technical cookies. For all other types of cookies, we require your consent, and it is entirely up to you whether you grant us your consent and, if so, to what extent. You can set

the scope of your consent for the collection of cookies via the 'Cookie Bot', which is displayed on the relevant web page. You will also find detailed information about cookies there.

Depending on whether and to what extent you give us your consent, we may then use cookies to personalise content and adverts, provide social media features, and analyse traffic to our company's website. We may then share information about how you use our website with our social media, advertising and analytics partners. These partners may combine this data with other information you have provided to them or which they have obtained in connection with your use of their services.

8. Your rights regarding the protection of personal data

Our company strives to process your personal data transparently and fairly and to ensure its proper protection, always in accordance with the relevant legislation. To reassure you of our responsible approach to processing your data, we are prepared to respond promptly and professionally to your legitimate requests.

- Where the processing of personal data is based on your consent, you have the right to withdraw your consent for future processing at any time.
- You have the right to request access to your personal data and more detailed information about its processing from us as the data controller.
- You have the right to request that we rectify any inaccurate or incomplete personal data concerning you.
- You have the right to request that we provide your personal data in a commonly used and machine-readable format, enabling its transfer to another controller, provided that we have obtained it on the basis of your consent or in connection with the conclusion and performance of a contract, and it is processed by automated means.
- You have the right to object to the processing of some or all of your personal data on the legal grounds set out in Article 6(1)(e) and (f) of the GDPR.
- You have the right to request that we erase your personal data.
- You have the right to lodge a complaint with the Office for Personal Data Protection.

What will happen to your request

You may submit your request electronically by email or by post to the address given at the end of this information notice. We will deal with your request without delay. We will provide you with information and details of the measures taken without undue delay and, in any event, within one month of receiving an identifiable, specific and comprehensible request. This time limit may, if necessary and depending on the complexity of the matter, be extended by a further two months. We will always inform you of any such extension within one month of receiving your request, together with the reasons for the delay.

If the request is not identifiable, specific and comprehensible, we will ask you to supplement it, in which case the one-month time limit for processing the request will be suspended until it has been supplemented. We would also like to draw your attention to the fact that if you do not supplement your request within a reasonable period, the request will not be processed on the grounds of its rejection in accordance with Article 12 of the GDPR. If you submit your request electronically, the information will be provided to you electronically, where possible. In other cases, the response will be sent to you by registered post or delivered in person.

Should we not take the measures you have requested, we will inform you without delay, and no later than one month from receipt of the request, of the reasons for not taking such measures and of the possibility of lodging a complaint with the supervisory authority and seeking judicial redress.

We provide information and deal with your requests free of charge. However, if requests are manifestly unfounded or excessive, in particular because they are repetitive, we may either: a) charge a reasonable fee taking into account the administrative costs associated with providing the requested information or communication, or with carrying out the requested actions; or b) refuse to comply with the request.

Please note that the exercise of data subjects' rights under Articles 12 to 22 of the GDPR may be restricted in accordance with Article 23(1) of the GDPR.

9. Glossary of terms and abbreviations

Cookies	A small text file sent to your browser by a website you visit. It enables the website to record information about your visit, such as your preferred language and other settings. This can make your next visit to the site easier and more productive. Cookies are important; without them, browsing the web would be much more complicated.
Supervisory Authority	An authority in the Czech Republic established as the Office for Personal Data Protection (hereinafter referred to as the 'OPDP') under the Act on the Processing of Personal Data. It is entrusted with the powers of a central administrative authority in the field of personal data protection to the extent specified by this Act, as well as other powers laid down by specific legislation.
The GDPR	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).
Personal data (hereinafter 'PD')	Any information relating to an identified or identifiable natural person; an identifiable natural person is a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Data Protection Officer	A person appointed for the entire ČEZ Group and selected companies of the ČEZ Group in accordance with Article 37 of the GDPR. The Data Protection Officer (hereinafter also referred to as the "DPO") has independent responsibility for a defined area of personal data protection within the ČEZ Group and selected companies of the ČEZ Group, and acts as the point of contact for dealings with the Office for Personal Data Protection and data subjects. The Data Protection Officer's primary responsibility is to protect the interests of data subjects.
Recipient	A natural or legal person, public authority, agency or other body to whom personal data are disclosed, whether a third party or not. The recipient has a legal, contractual or other authority to process personal data. These include other controllers or processors, such as tax, administrative or regulatory authorities. However, public authorities which may obtain personal data in the course of a specific investigation in accordance with the law of a Member State are not considered recipients; the processing of such personal data by these public authorities must comply with the applicable data protection rules for the specific purposes of the processing.
The ČEZ Group	The ČEZ Group comprises a group of companies centred around the parent company ČEZ, a. s., operating primarily in the energy sector and linked to this parent company mainly through shareholdings. Further information is available here.
ESCO Group	The ESCO Group is a controlled group of interconnected subsidiaries operating on the Czech and Slovak markets in the field of sustainable energy and district heating. It supplies and operates solutions that help corporate, local authority and government customers meet their energy and climate targets. The ESCO Group forms part of the ČEZ Group as a platform for the development of modern energy services. The ESCO Group also acts as a joint controller within the meaning of Article 26(1) of the GDPR. Further information is available here.
Data Controller	A legal entity (ČEZ, a. s.) which determines the purposes and means of personal data processing, carries out the processing and is responsible for it. The controller may authorise or commission a processor to process personal data.
Data subject (hereinafter "DS")	A natural person to whom the personal data relate. A data subject is considered to be identified or identifiable if their identity can be ascertained, directly or indirectly, on the basis of one or more items of personal data.
Proportionality test	Assessment of a data subject's request by the Controller, where the data subject's request is manifestly unfounded or excessive, in particular because it is repetitive. Requests may be considered manifestly unfounded, for example, where they are, at first glance, entirely devoid of justification (where a justification is required) and it is not possible, even by interpretation, to ascertain what the data subject is seeking (an example might be an objection to processing under Article 21(1) of the GDPR, where the data subject fails to provide information in the request about their circumstances that would enable the Controller to assess whether a legitimate interest outweighs the data subject's interest). Requests may be considered manifestly unfounded in particular where they are unreasonably repetitive or numerous. This cannot be generalised; each case must always be assessed in its specific context. The Controller must demonstrate that a request is manifestly unfounded or excessive and provide reasons for this in the notification informing the data subject and the Data Protection Officer of the refusal of the request. The Controller must document these reasons and retain them for any inspection by the Supervisory Authority
ZZOÚ	Act No. 110/2019 Coll., on the processing of personal data, as amended
Processing of personal data	Any operation or set of operations which is carried out on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or any other form of disclosure, alignment or combination, restriction, erasure or destruction.
Data processor	A natural or legal person, public authority, agency or other body which processes personal data on behalf of Data controller
Special categories of data (sensitive data)	Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, and data concerning a natural person's health, sex life or sexual orientation.

10. Contact us

If you have a request or complaint regarding the processing of your personal data, or an enquiry for the person responsible for personal data processing at our company, please contact us at the email address info@capexus.cz or at the address CAPEXUS s.r.o., Moulíkova 3286/1b, 150 00 Prague 5 – Smíchov, quoting the reference 'personal data processing'. We will respond to your requests, enquiries or complaints as soon as possible, but no later than one month after receipt. If, due to the complexity of your request or a high volume of requests from other individuals, we are unable to deal with your request in time, we will inform you of the necessary extension to the deadline.

11. Effective Date

This document comes into effect on the date of publication, 25 May 2018. The text was last updated on 1 June 2026.