PRIVACY POLICY

A. General Section

1. OPENING PROVISIONS

1.1. CZ.NIC, an interest association of legal entities, Company ID No.: 67985726, with its seat at Milešovská 1136/5, Vinohrady, 130 00 Prague 3, incorporated in the Register of Associations kept by the Municipal Court in Prague under file No. L 58624 (hereinafter "**CZ.NIC**" or "**CZ.NIC Association**"), establishes these principles for the processing of personal data by the CZ.NIC Association.

1.2. CZ.NIC performs a range of activities and provides a range of services for the processing of personal data, and the range of this data, as well as the method used for its processing, differs from one case to another. This General Section therefore establishes the general principles for the processing of personal data by the CZ.NIC Association (hereinafter the "**General Privacy Policy**") with the fact that the specific treatment of the processing of personal data for individual activities or services is contained in the Special Section relating to the processing of personal data for individual activities or services (hereinafter the "**Special Privacy Policy**"). Together, they are also referred to as the "**Privacy Policy**".

1.3. The concepts capitalised in the **Privacy Policy** shall have the meaning defined in the **Privacy Policy** or other documents issued by the CZ.NIC Association, especially in the terms and conditions or rules.

1.4. **Personal data protection legislation** shall mean the legislation that is part of the Czech legal system, including the relevant international treaties and European Union legislation, concerning the protection of personal data.

1.5. The CZ.NIC Association holds the Information Security Management System (ISMS) certification according to ISO 27001.

2. ACQUISITION, PURPOSE AND LEGAL BASIS OF THE PROCESSING OF PERSONAL DATA

2.1. Except as otherwise provided in the **Privacy Policy**, personal data is acquired by the CZ.NIC Association from the data subjects.

2.2. If the legal basis, purpose or extent of processing of personal data is not covered by the General Privacy Policy, it is stated in the Special Privacy Policy.

2.3. The data subject providing personal data to the CZ.NIC Association is responsible for the accuracy of all personal data provided and declares that it is not pseudonymous (except for activities or services that explicitly provide for the provision of pseudonymous data).

3. PROCESSING OF PERSONAL DATA UNDER AN AGREEMENT

3.1. The processing of personal data by the CZ.NIC Association is carried out in the vast majority of cases (exceptions are provided in the **Privacy Policy**) because of the necessity of fulfilling an agreement concluded between CZ.NIC and the data subject, always for the purpose of fulfilling such an agreement.

3.2. The CZ.NIC Association is authorised to process personal data for the entire duration of the agreement and for a period of 10 years after the expiration of the agreement, unless stated otherwise in the

Special Principles or unless a longer period is stipulated by law, for the purposes of archiving and the legitimate interests of the CZ.NIC Association or third parties under a restricted processing regime so that the data can be used to determine the exercise of, or to defend against, legal claims.

4. PROCESSING OF PERSONAL DATA ON THE BASIS OF THE CONSENT OF THE DATA SUBJECT

4.1. If the processing of personal data is subject to consent, it is provided to the extent and for the purposes of such consent in accordance with this **Privacy Policy**, and its refusal, if any, does not affect the provision of the services of the CZ.NIC Association.

4.2. The data subject may revoke this consent to the processing of personal data at any time, but this shall be without prejudice to the lawfulness of processing based on a consent given prior to the withdrawal of consent. The provisions of Article 3.2 shall apply *mutatis mutandis*.

5. PROCESSING OF PERSONAL DATA PROVIDED BY A THIRD PARTY

5.1. The person who provides the CZ.NIC Association with the personal data of third parties represents such third parties and confirms that it is authorised by such third parties to provide their personal data.

5.2. The data subject or person providing the CZ.NIC Association with the personal data of third parties is obliged to notify the CZ.NIC Association of any change in the personal data provided; in the case of the personal data of third parties, that person represents such third parties and confirms that it is authorised by such third parties to provide their personal data.

6. SOME INDEPENDENT PROCESSING OF PERSONAL DATA

6.1. The data of job seekers is processed to the extent that it is stated in the curriculum vitae provided to the CZ.NIC Association by the job seeker for the sole purpose of the selection procedure and for a maximum period of one year after its completion, unless an employment relationship has been established between the applicant and the CZ.NIC Association. During that time, the job seeker may notify the CZ.NIC Association that he/she no longer wishes to be in the register, in which case the CZ.NIC Association shall terminate the processing of his/her personal data without delay.

6.2. The CZ.NIC Association processes the personal data of its contractual partners, including those data subjects who have used the e-shop operated by CZ.NIC or participated in the trainings, seminars, lectures, conferences or other events organised by the CZ.NIC Association, as necessary for the performance of agreements with these contractual partners, and, in connection with this, also for the purposes of the legitimate interests of CZ.NIC, for the period specified in Article 3.2; this personal data includes:

- first names, surnames, addresses, telephone numbers, email addresses, identification numbers, tax identification numbers and other data required by law, as well as the contact details of these contractual partners necessary for the performance of agreements with these contractual partners and for the purposes of the legitimate interests of the CZ.NIC Association, if such information is included in the relevant agreement or if such employees participate in the performance of such an agreement, to a similar extent.

6.3. The CZ.NIC Association also processes sound recordings of telephone calls received by the customer support service of the CZ.NIC Association for the purposes of fulfilling contractual obligations, the

legitimate interests of the CZ.NIC Association or protecting the vital interests of the data subject or other individual. Records are kept for six months from their being made.

6.4. The CZ.NIC Association processes video and audio-video recordings from security systems (especially CCTV systems) intended for protection, security and monitoring access to the technical facilities of the CZ.NIC Association, for a period of seven days from their being made, in order to verify whether there has been a security breach or other security incident. This processing of personal data is necessary for the purposes of the legitimate interests of the CZ.NIC Association and third parties, in particular contractual partners of the CZ.NIC Association which could be affected by security incidents (e.g. interference with domain name holder rights through unauthorised access to the Central Register, etc.).

7. METHODS AND MEANS OF PROCESSING PERSONAL DATA

7.1. The CZ.NIC Association

    7.1.1. processes personal data mainly in <u>electronic form and by automated means</u>;

    7.1.2. <u>keeps personal data in its information systems</u> or on backup media, mainly on the territory of the European Union and, in limited cases, outside this territory. The information systems of the CZ.NIC Association or the backup media are located or kept under the direct control of CZ.NIC or in third-party facilities, but always remain under the direct control of CZ.NIC and, unless otherwise provided by the **Privacy Policy**, the personal data contained therein is not provided or made available to third parties.

7.2. <u>Technical and organisational protection measures:</u> The CZ.NIC Association has adopted and documented such measures as to ensure that access to personal data and means for its processing are restricted to authorised persons only and that such authorised persons process and access only such personal data and processing means as correspond to their level of authorisation. At the same time, the CZ.NIC Association has adopted and documented such measures as to prevent any unauthorised reading, creation, copying, transmission, modification or deletion of records containing personal data and to trace who processed the personal data and how or who accessed the means of personal data processing and how.

7.3. <u>Processing by the CZ.NIC Association and other persons:</u> Personal data is processed by the CZ.NIC Association; only to a limited extent or to the extent necessary for the fulfilment of the contractual and legal obligations of the CZ.NIC Association may personal data be provided to third parties who provide the CZ.NIC Association with certain activities as subcontractors, such as marketing, dispatch of mail, processing of payments, keeping of accounts, tax advisory services, legal services, validation of contacts, etc., or where these are persons who require the provision of data in the exercise of their authority and/or on the basis of a contractual obligation of the Association (e.g. public funding providers), etc. However, this applies only to personal data that is necessary for the performance of such an activity or obligation, and the relevant persons are bound to protect the personal data to the extent of and in accordance with the law.

7.4. <u>Transmission abroad:</u> the CZ.NIC Association does not transmit personal data abroad except for some subcontractors as per Article 7.3 and with the exception set out in the Special Principles (Part B.I and B.IV).

8. USE OF PERSONAL DATA FOR SECURITY AND MARKETING PURPOSES

8.1. Because of the nature of the activities of the CZ.NIC Association, which include the area of computer and Internet security and the fight against cybercrime, and the fact that ensuring the safe operation of CZ.NIC services, especially the Central Register, is crucial for the development and daily functioning of public administration and entrepreneurs as well as the private activities of citizens, the CZ.NIC

Association is authorised to use the personal data of data subjects for the purpose of <u>identifying risks, vulnerabilities or threats related to data subjects or information systems or services operated by them, R&D in this area and targeted information on identified facts</u>.

8.2.   The CZ.NIC Association is authorised to use the personal data of data subjects in order to:

8.2.1.   <u>provide information on the activities and services of the CZ.NIC Association</u> which are the subject of a concluded agreement to the performance of which the processing of personal data by the CZ.NIC Association pertains, or for which consent to the processing of personal data has been granted;

8.2.2.   distribute commercial communications relating to other activities or services;

8.3.   The data subject is, at any time, entitled to refuse to permit the processing of their personal data pursuant to Article 8.2.

8.4.   The CZ.NIC Association is authorised to use the personal data of data subjects for statistical processing purposes and to publish these statistics.

9.   LOGGING ACCESS, COOKIES AND LINKS

9.1.   In order to ensure the functionality and security of its website, services or applications (hereinafter the "Website") the CZ.NIC Association may process the logs of access to the Website, including IP addresses, to the necessary extent.

9.2.   In order to ensure the best possible functionality for users/visitors or for analyses of its Website, the CZ.NIC Association may process a Website user/visitor data or may implement the so-called cookies (small text files stored in the user's/visitor's computer) into the user's/visitor's browser. Detailed information about the cookies used by the CZ.NIC Association is available in the cookies settings displayed on the Website (hereinafter "Cookies bar"). With the exception of those cookies that are necessary to ensure the functionality of the Website (so-called essential cookies), the user/visitor is entitled to activate and/or deactivate cookies in the cookies settings according to their preferences. The user/visitor acknowledges that blocking or deactivating certain cookies may affect the proper functioning of the Website from a technical point of view. The legal basis for the use of cookies, with the exception of the necessary cookies, is the consent of the user/visitor.

9.3.   Except for the data necessary to prove the identity of the user/visitor to the Website when entering instructions for the implementation of changes (in particular in connection with changes to data in the case of domain names or the mojeID service), data according to Articles 9.1 is retained only for the time necessary to ensure the functionality of the Website. The length of the data processing time according to Article 9.2 is specified in the Cookies bar.

9.4.   CZ.NIC websites may contain links to third parties and their websites, services or applications. Such third parties may process the data of a visitor to their websites or a user of their service or application, or they may implement what are known as cookies into the visitor's browser. The processing of the data of a visitor to the website or a user of the service or application shall then be governed by the policies adopted by these third parties, and the visitor to the website or user of the service or application should be familiar with them before visiting the website or using the service. The CZ.NIC Association is not responsible for the processing of personal data by these third parties.

10.   RIGHTS OF THE DATA SUBJECT AND THE POSSIBILITY OF CONTACTING THE CZ.NIC ASSOCIATION

10.1.   The CZ.NIC Association may be contacted about privacy matters in one of the manners listed at https://www.nic.cz.

10.2. The data subject is entitled to:

10.2.1. request CZ.NIC to explain and eliminate the resulting situation (in particular by blocking, correcting, supplementing or removing personal data) if the data subject finds or believes that the CZ.NIC Association is carrying out the processing of his/her personal data contrary to the law, in particular if the data is inaccurate with regard to the purpose of its processing; correction or supplementation may be performed through the Designated Registrar,

10.2.2. require CZ.NIC to allow the data subject to access, rectify or erase his/her personal data (through the Designated Registrar), or to restrict the processing thereof,

10.2.3. object to the processing of his/her personal data to the extent and under the conditions laid down by the law,

10.2.4. exercise the right to data portability in the case of automated processing of personal data performed with his/her consent or to conclude an agreement between him/her and the CZ.NIC Association, to the extent and under the conditions laid down by the law,

10.2.5. object against the processing of his/her personal data by the CZ.NIC Association with the supervisory authority, which is the Office for Personal Data Protection.

11. CHANGES TO THE PRIVACY POLICY

11.1. The CZ.NIC Association is entitled to amend the **Privacy Policy** at any time. The CZ.NIC Association is required to publish any changes at least one month before the effective date of such a change on the CZ.NIC website of the relevant services, on pages dedicated to CZ.NIC activities, or on the main website of CZ.NIC at https://www.nic.cz. The current versions of these documents are also always available on this website.

11.2. Any amendments, reservations, limitations or deviations concerning the **Privacy Policy** are excluded.

11.3. The right to withdraw consent to the processing of personal data under Article 4.2 shall not be affected by any change of the **Privacy Policy**.

B. SPECIAL SECTION

B.I. Processing of personal data in connection with domain name registrations

1. PURPOSE AND LEGAL BASIS OF PERSONAL DATA PROCESSING

1.1. Personal data is acquired by the CZ.NIC Association from the data subjects or their representatives.

1.2. Purpose of processing: maintaining a database of names of domains registered under the top-level domain .cz (ccTLD .cz) or in the .0.2.4.e164.arpa (ENUM) domain, known as the Central Register. The Central Register contains data on all registered domain names and their holders and other contact persons, including historical data. The Central Register is intended to record the rights to individual domain names, not only those that are currently valid, but also to verify changes made in the past, in particular transfers of domain names or other legal acts that can be identified on the basis of records in the Central Register, as well as those valid in the past.

1.3. Legal basis: implementation of the domain name registration agreement in the case of data provided under Articles 2.4 and 2.5. In other cases, the legal basis is the consent of the data subject, and the personal data subject is entitled to revoke their consent at any time by removing the data through the Designated Registrar or a CZ.NIC Association service (such as the mojeID service, the Domain Browser).

2. PERSONAL DATA KEPT IN CONNECTION WITH DOMAIN NAME REGISTRATIONS

2.1. The CZ.NIC Association maintains and processes the personal data of data subjects in the Central Register.

2.2. Personal data subject: The holder of a Domain Name or any contact person in connection with the Domain Name, Contact, Nameserver Set or Key Set in the Central Register.

2.3. Personal data kept in the Central Register: first name and surname, identifier, email addresses, addresses, telephone and fax numbers, identification numbers, tax identification numbers, identification numbers of the Ministry of Labour and Social Affairs or ID numbers.

2.4. Mandatory personal data (required to conclude the agreement): name of the Domain Name, contact identifier (ID), first name and surname, email address and address.

2.5. CZ.NIC is entitled to require the data subject to provide additional personal data beyond the data under Article 2.4 that is necessary for his/her unambiguous identification, e.g. in the course of ongoing judicial or other proceedings, or resolving disputes under the Rules of Alternative Dispute Resolution, in particular the date of birth and the identification number.

3. PROVIDING PERSONAL DATA OVER THE INTERNET

3.1. WHOIS service (or other similar method): The CZ.NIC Association provides the currently valid personal data in the Central Register, which has not been identified as hidden in accordance with Article 3.2 of these Special Principles, through the Internet as part of the information services of the CZ.NIC Association. Because of the nature of the Internet network, this data can also be accessed outside the European Union.

3.2.   <u>Avoiding of the disclosure of data accessed under Article 3.1</u>: the data subject may prevent the disclosure of data by hiding it under the conditions set out in the Registration Rules (after verifying the correctness of the data and the fact that the data belongs to an individual). It is not possible to hide the Domain Name, contact ID, first name and surname given for the contact.

3.3.   <u>Purpose of provision</u>: protection of the legitimate interests of data subjects, in particular ensuring legal certainty in relation to the exercise of their rights to Domain Names. This provision of personal data is furthermore provided to protect the legitimate interests of third parties with regard to the security of the Internet, communication on this network, the security of services provided using Domain Names, the protection of the rights of third parties against interference with these rights by Domain Names or services provided, and also in order for the third parties concerned to be able to contact the Holder of the Domain Name or other persons directly and without undue delay and expense or, alternatively, to be able to contact the competent authorities with the indication of a particular Holder to ensure the protection of their rights.

3.4.   Access to Registrars and their responsibility for the processing of personal data:

   3.4.1.   personal data contained in the Central Register may be accessed by Registrars, including those from countries outside the European Union;

   3.4.2.   registrars act with respect to the personal data of their customers in the position of data controllers and are obliged to observe all obligations imposed on them by the personal data protection legislation, other legal regulations and the Domain Name Registration Cooperation Agreement concluded with the CZ.NIC Association; the registrar is the data controller of the personal data of its customers, regardless of whether the data was provided to it directly or by other persons representing the customers;

   3.4.3.   The CZ.NIC Association is in the position of the personal data controller in relation to the personal data obtained by the conclusion of the domain name registration agreement pursuant to the Registration Rules;

   3.4.4.   The registrar and the CZ.NIC Association have agreed to inform each other about any security incidents related to personal data breaches.

3.5.   <u>Restrictions on the use of personal data accessed through the CZ.NIC information services</u>: the data is only intended for purposes related to the administration and operation of the Internet or for the purposes of judicial or other similar proceedings in cases relating in particular to the possession and use of a specific Domain Name. The Domain Name Register is subject to legal protection under the relevant provisions regarding the protection of databases. No data, information or any part thereof may be used in any other way without the prior written consent of the CZ.NIC Association. The use of data, information or any part thereof contrary to the intended purpose or a repeated extraction and utilisation of a part of data in the Central Register that is not insubstantial in terms of quantity or quality may be considered as a violation of the rights of the CZ.NIC Association, persons whose data are contained in the Domain Name Register, or copyright holders. The violation of such rights shall especially include the collection and/or provision of data or any parts thereof for the purpose of sending unsolicited communications, or causing detriment to network services and the privacy of other users. Use contrary to the intended purpose may also lead to the criminal liability of the person responsible for such use.

4.   OTHER PROVISION OF PERSONAL DATA

4.1.   <u>Provision to courts and other similar authorities</u>: personal data of the data subject, including data that is marked as hidden, may be disclosed and the data subject's consent to the current versions of the Registration Rules and the Rules of Alternative Dispute Resolution may be documented to a court, arbitration court, other state authority or controller or expert under the Rules of Alternative Dispute

Resolution, for the purposes of their official activities or in the context of the settlement of disputes in accordance with the law or the settlement of disputes under the Rules of Alternative Dispute Resolution. Only data related to specific data subjects or specific Domain Names may thus be provided. Under the same conditions, CZ.NIC is also entitled to provide information about historical data, if available.

4.2. <u>Provision to third parties:</u> on the basis of a written request, the CZ.NIC Association will provide information on the contact details (email address, mailing address) of the Holder of one particular Domain Name, even if such data is marked as hidden. The request must clearly identify the applicant (authenticated signature, sending via the Data Box Information System) and state and document the purpose for which the applicant is requesting that the data be revealed, and CZ.NIC is, at its discretion, entitled to refuse to provide the information if it comes to the conclusion that the purpose of the application is not consistent with good business practice or if the applicant, without any legitimate reason, has repeatedly asked for information about the details of different Holders of various Domain Names. CZ.NIC is entitled to charge for the application. The applicant is entitled to use the information solely for the purpose stated in the application.

4.3. <u>Providing historical data to the Domain Name Holder:</u> Upon the request of the current Domain Name Holder, CZ.NIC will provide historical data from the Central Register which pertains to the Domain Name, i.e. data about the previous Domain Name Holders since the date of the most recent Domain Name registration for the maximum of the last five years. For the purpose of this provision, the term "historical data" refers to such data about the previous Holders which cannot be designated as hidden; data about the current Holder is provided irrespective of whether it can be designated as hidden. Historical data can only be provided if available.

4.4. <u>Right to portability through the Domain Browser:</u> if the Domain Name Holder is a user of the mojeID service and his/her mojeID account is kept in the Central Register for the Domain Name as a holder or administrative contact, his/her personal data is available in what is termed the Domain Browser operated by the CZ.NIC Association.

B.II. Processing of personal data in connection with the mojeID service

1. PURPOSE AND LEGAL BASIS OF PERSONAL DATA PROCESSING

1.1. Personal data is acquired by the CZ.NIC Association from the data subjects or their representatives.

1.2. <u>Purpose of processing:</u> the provision of the mojeID service as a free and open decentralised system for managing the electronic identities of the users enabling the use of common identification data to access various information systems operated by different providers (hereinafter the "**Service**"). An integral part of the Service is the verification of the identity of the data subject and the creation of a trust point for providers who can rely on the identification of the data subject by CZ.NIC.

1.3. <u>Legal basis:</u> performance of the agreement between CZ.NIC and the personal data subject.

2. PERSONAL DATA KEPT IN CONNECTION WITH THE MOJEID SERVICE

2.1. The CZ.NIC Association manages and processes personal data in the Identity Register. The Identity Register may be associated with the Central Register that CZ.NIC operates as a database of domain names, their holders, and other persons, or may be identical to the Central Register.

2.2. The subject of personal data is the person using the Service.

2.3. <u>Scope of personal data processed:</u> the Identity Register keeps personal data listed in Annex 1 to these Special Principles; it contains personal data, the provision of which by the User or the processing of which by CZ.NIC as part of the provision of the Service is required, as this is necessary for proper use of the Service.

2.4. <u>Acquisition and storage of copies of identity documents:</u> if the data subject decides to personally verify his/her data with the CZ.NIC Association upon the presentation of his/her identification document, the CZ.NIC Association is authorised to obtain and store copies of the identification document for authentication of the data and unambiguous verification of the identity of the User of the Service. The data subject has the opportunity to enable identity verification in other ways (e.g. via ISDS, authenticated signature), where CZ.NIC does not check the identity documents and does not procure any copies thereof.

2.5. <u>Use of third parties in connection with the provision of the Service:</u> the CZ.NIC Association may use the services of third parties, known as validation agents, to validate personal data provided for the purpose of providing the Service. In this activity the validation agent is a personal data processor, who is obliged to proceed on the basis of an agreement with CZ.NIC Association in order to prevent unauthorised persons from accessing personal data. It is always up to the data subject whether he/she will use the validation agent's services or whether he/she will verify his/her data directly with the CZ.NIC Association (e.g. via the Data Box Information System, by providing a copy of the identification document) or otherwise verify his/her data (validation clause for the signature of the data subject in the validation request). Providing data to the extent necessary for validation to the validation agent is mandatory if the data subject chooses this method.

2.6. CZ.NIC Association is entitled to require the data subject to provide any additional information essential for his/her identification, especially his/her address of permanent residence, date of birth

and identification number (company ID No.) if such information is necessary for the unambiguous identification of the data subject, in particular during ongoing judicial or other similar proceedings.

2.7.   The CZ.NIC Association maintains and processes records on the use of the Service by the data subject for a maximum of six months from the use of the Service.

2.8.   The CZ.NIC Association manages and processes personal data used or obtained in identification or validation according to the Rules for the duration of identification or validation and for a maximum of five years. This does not affect the obligation of the CZ.NIC Association to store legally required data in the records of issued Means of Electronic Identification for 15 years after such Means of Electronic Identification ceases to be valid.

3.   PROVISION OF PERSONAL DATA

3.1.   <u>To providers:</u> when logging in with the Service in accordance with the Rules, CZ.NIC verifies the identity of the data subject whose data is to be provided, informs the provider of the outcome of the verification, and passes to the provider the personal data of the data subject that the data subject has designated as data that can be provided to providers. Depending on the provider or the nature of the service operated by the provider, personal data may also be provided outside the territory of the European Union. The choice of the provider and the determination of the extent of the personal data transmitted are solely within the data subject's (Service User's) competence. <u>The user is advised to become acquainted with the relevant provider's privacy policy through the Service prior to transmitting the data to the Provider, as the provider becomes the controller of the personal data by accepting it from the User.</u>

3.2.   <u>To courts and other similar bodies:</u> the CZ.NIC Association is authorised to provide personal data from the Identity Register, even if it is marked as data not transferred to providers, including any data additionally provided, as well as records on the use of the Service by the data subject, including data that was transmitted to the provider by such use, to administration authorities and courts, including the arbitration court, in accordance with the law and in the course of their official activities or in dispute settlement. In this way it is possible to provide only the data related to specific data subjects. Under the same conditions, CZ.NIC is also entitled to provide information about historical data, if available.

3.3.   The CZ.NIC Association shall provide the data subject, upon request, with the personal data kept on the data subject in the Identity Register, including historical data, as well as the records on the use of the Service by the data subject, including data that was transmitted to the provider during such use, for no longer than the period stipulated under Articles 2.7 and 2.8. Personal data is available to the data subject in the Service User Account through which the data subject's data transfer rights can be exercised in accordance with legal regulations.

4.   PROCESSING OF PERSONAL DATA BY THE PROVIDER

4.1.   The provider who has been provided with personal data of the data subject in accordance with the Rules becomes the controller of the personal data provided and is obliged to process such personal data only for the purpose for which the data subject provided it.

4.2.   Further processing of the personal data that has been transferred is a matter of the relationship between the data subject and the provider. The provider is obliged to acquaint the data subject with the **Privacy Policy**. The provider is obliged to use the personal data of the User in accordance with the law.

Annex 1

Data	Required data
Identifier	Yes
Date and time of last change	No
Date and time of last update	No
Date and time of creation	Yes
Name	Yes
Organisation	No
Address *(this may be the address of permanent residence/seat of a legal entity/seat of an individual - entrepreneur)*	No
Mailing address	Yes
Telephone	Yes
Fax	No
Email address	Yes
Attributes of publication in WHOIS	No
Email address for notifications	No
Tax identification number	No
Type of identification string (company identification number, tax identification number, identity card, passport or the MoLSA identifier) and the identification string (company identification number, tax identification number, identity card number, passport number or the MoLSA identifier)	No
Data box ID	Yes (in the case of validation through a data box using ISDS data)
Password	Yes
List of certificates	No
String for the certificate of vehicle registration	No
Validation attribute	No
Date of birth	No
"Over 18" attribute	No
Student	No
Nickname	No
Picture	No
Address list	No
List of telephone numbers	No
List of IM identifiers (ICQ, Google Talk, etc.)	No
URL list	No
Email list	No

B.III. Processing of personal data in connection with the TURRIS project

1. PURPOSE AND LEGAL BASIS OF PERSONAL DATA PROCESSING

1.1. Personal data is obtained by the CZ.NIC Association from the data subjects or their representatives, possibly in connection with the provision of services under the TURRIS project.

1.2. Purpose of processing: provision of services within the TURRIS project, which includes monitoring, analysis and collection of information on security incidents in the field of computer networks, in particular the Internet, and in which CZ.NIC collects and evaluates data from Turris routers (hereinafter the "**Device**") which the data subjects involve in the project (hereinafter the "**Project**").

1.3. Legal basis: performance of the agreement under which the data subject engages the Device in the Project and at the same time protection of the vital interests of data subjects, such as protection against security incidents within the Internet that may have a significant impact on their rights, including fundamental human rights.

1.4. Upon the expiration of the agreement under which the data subject connects the Device to the Project to which the personal data relates, CZ.NIC is authorised to process such personal data only for the purpose of archiving, the fulfilment of statutory obligations and for the purposes of the legitimate interests of the CZ.NIC Association or third parties under a restricted processing regime so that such data may be used for the purpose of determining, enforcing or defending against legal claims, for a maximum period of 10 years after the expiry of such an agreement; the data obtained from the Device must be destroyed by the CZ.NIC Association after the expiry of the time limits according to Article 3.4, and any further storage and processing of data in accordance with Article 3.4 is not thereby affected.

2. PERSONAL DATA PROCESSED IN CONNECTION WITH THE TURRIS PROJECT

2.1. The subject of personal data is a person participating in the Project, i.e. the owner, lessee or user of the Device.

2.2. Scope of processed personal data: first name, surname, addresses, telephone numbers, email addresses, identification numbers, tax identification numbers.

2.3. Other data processed by CZ.NIC that can lead to the identification of the data subject and that can be considered personal data to the following extent:

2.3.1. device identification, temperature, voltage and current data from internal sensors, processor and memory usage information and their capacity or damage, error information in preinstalled software or software that was installed in the Device by CZ.NIC during the duration of the data subject's participation in the TURRIS project,

2.3.2. Communication protocol, the source and target (technical description – data at the level of the packet headers, particularly to distinguish IPv4/IPv6 or TCP/UDP, packet type, identification of the source and target address, source and target port, communication time),

2.3.3. data from the application layer that has the nature of metadata (e.g. the contents of DNS packets, http protocol headers, certificates used in the initialisation of TLS sessions, etc.), exclusively provided that they are essential for the relevant security analysis and subject to compliance with the terms and conditions set out in Article 3.2,

2.3.4.   Statistical data on the session, including the packet size, the protocol used, the volume of data transferred during a single session, and

2.3.5.   data from the logs of unauthorised accesses from the firewall, to the extent corresponding to Article 2.3.2.

2.4.   The CZ.NIC Association does not process any such data that constitutes the contents of the communication (internal contents of the packets), including personal data, passwords, etc. contained in the transmitted packets, except for data analysis according to Article 2.3.3.

2.5.   In connection with the provision of services under the TURRIS project in the field of the prevention of security incidents in the Internet environment, protection of the vital interests of persons, including data subjects, and scientific and research activities, further data may be processed which may lead to the identification of certain data subjects other than those listed in Article 2.1, namely IP addresses. These IP addresses are acquired through the monitoring of cyber-attacks, storage and evaluation of data on such attacks, and subsequent public access through the TURRIS project. The data subjects to which these addresses belong may exercise their rights in accordance with Article 10 of the General Principles.

3.   PROCESSING OF PERSONAL DATA

3.1.   <u>Place of processing:</u> the personal data that is obtained is processed to the greatest extent possible if the nature of the analysis so allows; only data obtained from analysis is transmitted directly to the Device and the servers under the direct control of the CZ.NIC Association. In other cases, it is only possible to transfer data to the servers directly controlled by the CZ.NIC Association if such data cannot be processed directly in the Device. Data will be transferred from the Device to the servers directly controlled by the CZ.NIC Association through an encrypted connection with direct control of the server certificate.

3.2.   <u>Data storage:</u> data collected from the Device are stored in an operationally separated data repository that is accessible only to a limited number of CZ.NIC staff assigned to activities under these terms and conditions.

3.3.   <u>Data collected for the purpose of the analysis will be stored separately from the data subject's database.</u> During the analyses, the CZ.NIC Association's employees will not have access to any information about the data subjects, but only to the unique identification of the Device. The interconnection of the information obtained through the Device and the identity of the data subject only makes it possible to display the selected information (especially logs and statistics) of the data subject via the Project's web interface or to inform the data subject of any security event or threat, if, in view of the imminent risk, general information on the results of the analysis is not sufficient.

3.4.   <u>Duration of the processing and storage of data obtained from the Device:</u> data is only processed for the time necessary for its analysis and processing, but not longer than 10 days (unless the data subject specifies a different time period in the Project web interface) from its receipt from the Device. Subsequently, the CZ.NIC Association shall only be entitled to store and process aggregated data which will not enable any clear identification of the source and target of the communication. This obligation does not apply to the technical data under Article 2.3.1 which the CZ.NIC Association is entitled to store and process without restriction.

4.   PROVISION OF PERSONAL DATA

4.1.   <u>Provision to third parties for protection against security threats:</u> in particular for providing information about potential security threats, but always in such a way that such data does not allow such third parties to identify unambiguously the data subject concerned under Article 2.1, in particular in connection with the performance of the activities of the CZ.NIC Association as the operator of the

National CERT according to legal regulations and in connection with the performance of the activities of the CZ.NIC-CSIRT Association.

4.2. <u>Provision to third parties for R&D purposes:</u> data obtained from the analysis of operation of the Device may be provided to third parties for the purpose of further research and development and sharing of information relevant to the fulfilment of the objectives of the Project (e.g. malware data exchange), but always in anonymised form so that it is not possible to identify a particular Device or data subject under Article 2.1.

4.3. <u>Providing information to data subjects:</u> an overview of information obtained from data acquired through the Device will be available to the data subject under Article 2.1 on the Project user page. Other data subjects (such as data obtained from the processing of information on sources of cyber-attacks) will be provided with information on processed data upon request in accordance with the General Privacy Policy.

B.IV. Processing of personal data when operating the National CERT

1. OPENING PROVISIONS

1.1. The CZ.NIC Association operates what is termed the National CERT pursuant to Act No. 181/2014 Coll., on Cybersecurity (hereinafter the "**Act**"), on the basis of a Public Contract on Securing the Activities of the National CERT and on Cooperation in the Field of Cybersecurity concluded on 18 December 2015 between the CZ.NIC Association and the Czech Republic – the National Security Authority (hereinafter the "**Public Contract**").

2. PURPOSE AND LEGAL BASIS OF PERSONAL DATA PROCESSING

2.1. Purpose of processing: the activities of the National CERT under the Act and the Public Contract.

2.2. Sources of processed personal data: notification of contact persons from entities listed in the Act, reports of cybersecurity incidents received under the Act and the Public Contract and within the TURRIS project, or from the data subjects concerned.

2.3. Legal basis: performance of tasks performed by CZ.NIC in the public interest or in the exercise of public authority under the Public Contract and the Act.

3. PERSONAL DATA KEPT IN CONNECTION WITH THE NATIONAL CERT

3.1. The CZ.NIC Association manages and processes, predominantly manually, the personal data of data subjects obtained from the contact information received from the authorities and persons referred to in the Act, where such personal data includes, in particular, first names and surnames, telephone numbers, addresses and email addresses of contact persons.

3.2. The CZ.NIC Association further manages and processes, mainly manually, the personal data of data subjects that it receives from reports of cybersecurity incidents or events, or from its search activity in addressing reported cybersecurity incidents or events.

4. PROVISION OF PERSONAL DATA

4.1. Personal data under these Special Principles is provided only in accordance with the Act and the Public Contract, or as part of the obligations imposed on the CZ.NIC Association by law, or in cooperation with other CERT/CSIRT Security Teams, as part of the legal obligations or contractual obligations of the CZ.NIC Association or the protection of the vital interests of data subjects, third parties associated with CZ.NIC, even outside the European Union where necessary (e.g. with regard to the localisation of a cybersecurity incident or event).