

Information on processing of personal data – Committee for Editorial Independence of the media house Economia, a.s.

Information for persons making a submission regarding an inadmissible interference with the free work of Economia's journalists and editors (the "Claimant" or "You")

You can notify the Committee for Editorial Independence (the "**Committee**") of an inadmissible interference with the free work of journalists and editors of the company Economia, a.s. ("**Economia**"). You can also make a submission anonymously.

The company Economia will treat your submission in such a way as to ensure its confidentiality. Increased attention is paid to the security of your submission so that no unauthorized person could access it. Only members of the Committee and the Committee's Secretary will have access to a submission containing your personal data. Your personal data may only be disclosed to other persons with your consent or if it is absolutely necessary for the purposes of the internal investigation of the submission. The responsible senior member of the editorial staff will also have access to a submission containing your personal data concerning inadmissible interference by other persons, unless your notice indicates that you wish to keep your identity as secret as possible.

If you make a submission to the Committee, which will also contain your contact details, you acknowledge that Economia, a.s. will process your personal data. You can find more information about the processing of your personal data below.

Who will process your data?

The information contained in the submission to the Committee will be processed by the company Economia, a.s., Id. No.: 281 91 226, with its registered office in Pod dráhou 1637/2, Holešovice, 170 00 Praha 7, registered in the Commercial Register maintained by the Municipal Court in Prague, File B 12746 (the "**Controller**"), subject to the conditions set out below.

What data will be processed?

The content of your submission and your contact details in the extent that you communicate them about yourself will be stored. These may be, in particular:

- name and surname, title
- contact email address
- contact post mail address
- telephone number.

However, you can also make a submission to the Committee anonymously.

Why and on what basis will your personal data be processed?

We keep the data on the Claimant in order to contact him/her to confirm the receipt of the submission, to be able to request additional information and to inform about the way of addressing the submission.

The purpose of processing personal data is the legitimate interests of Economia, namely the proper and effective addressing of submissions to the Committee, detecting cases of inadmissible interference with the

work of Economia's editorial teams, preventing such behaviour and strengthening readers' confidence in the independence of editorial content of Economia titles.

We will process your personal data in accordance with the relevant legislation on personal data protection, in particular in accordance with 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 (the "GDPR") and in accordance with Act No. 110/2019 Coll., on the processing of personal data.

Who will have access to your data?

In the case of a submission alleging a direct or indirect interference with the editorial content of Economia titles by the shareholder of the media house Economia, only members of the Committee and the Committee's Secretary will have access to the Claimant's personal data. An internal investigation of the submission, in which other persons, such as the Head of Content, the Editor-in-Chief of the title or the Company's lawyer, may participate, depending on the nature of the submission, will be conducted so as not to reveal the identity of the Claimant to these other persons without the Claimant's consent, provided that the nature of the submission makes it possible.

For other submissions concerning interference with the editorial content and free work of the Economia's editorial teams, a standard part of the investigation is to obtain the opinion of the responsible senior member of the editorial staff (the Head of Content, the Editor-in-Chief, or newsroom manager) and the submission will therefore be shared with him/her, unless your submission expressly states that you wish to keep your identity as secret as possible.

Matters that do not fall within the scope of responsibility of the Committee (including requests under the Press Act, complaints about interference with the right to protection of personality rights of natural persons or the right to protection of goodwill and reputation of legal entities by published content, inquiries and suggestions from readers regarding the editorial content of Economia titles, commercial offers and other correspondence), shall be forwarded by the Secretary of the Committee to the relevant department of the Controller.

How long will your data be processed?

Your data will be processed for a period appropriate to the purpose of the processing. Correspondence with claimants is kept for the period of three years from the completion of the submission. The internal record of the investigation of the submission to the Committee is archived for the period of five years.

How will your personal data be secured?

All personal information you provide to us will be secured by standard procedures and technologies. Your data will be stored on a secure server.

What are your rights regarding personal data protection?

In connection with the processing of your personal data, you have the rights below. However, keep in mind that the exercise of these rights may be subject to certain exceptions, and therefore it may not always be possible to exercise them in all situations. If you exercise your rights and your application is found to be justified, we will take the required measures without undue delay, no later than one month (in justified cases, this period can be extended by up to two more months).

- **Right to access personal data** You have the right to access your personal data processed by the company Economia.
- **Right to rectification** You can ask us to correct inaccurate personal data.
- **Right to erasure** You can ask us to erase the processed personal data, under the conditions set out in Article 17 of the GDPR. In the event of a legitimate request, we will take appropriate steps to inform the other controllers who process this data that you have exercised the right to erasure.
- **Right to object** If we process your personal data on the basis of the legitimate interests of the company Economia, you have the right to object to the processing of personal data concerning you.
- **Right to restriction of processing** In certain cases, you may request that we restrict the processing performed (for example, until your objections are resolved).
- **Right to make a complaint** You can also file a complaint regarding the processing performed directly with the Office for Personal Data Protection.

Your contact for any questions

Economia has appointed a Data Protection Officer (DPO). DPO can be contacted by e-mail at: ooou@economia.cz.