

První certifikační autorita, a.s.



# Principles of client's personal data processing

(Personal data privacy statement)

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**Version 1.04**

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**Table 1 – Document history**

Version	Date of Release	Approved by	Comments
1.00	24 May 2018	CEO of První certifikační autorita, a.s.	First edition.
1.01	10 July 2018	CEO of První certifikační autorita, a.s.	Auditor's comments included.
1.02	13 July 2020	CEO of První certifikační autorita, a.s.	Revision and formal changes of the document.
1.03	13 January 2022	CEO of První certifikační autorita, a.s.	Remote issuing of certificates included.
1.04	25 February 2022	CEO of První certifikační autorita, a.s.	Service for identity verification of natural persons used with remote issuing of certificates.

# 1 PRINCIPLES OF PERSONAL DATA PROCESSING

The purpose of this document is to inform the clients of the První certifikační autorita, a.s. company (hereinafter I.CA) about their personal data protection assurance. I.CA finds this protection to be as essential and therefore, among others, pays within the scope of its activities attention to strict respecting the relevant legislation. Personal data processing is periodically verified when assessing the compliance of ICA's trust systems.

## 1.1 Data controller of I.CA clients

Data controller is the company První certifikační autorita, a.s., registered office Podvinný mlýn 2178/6, 190 00 Praha 9. The company is registered in the Commercial Register kept by Municipal Court in Prague, reference number: section B, file 7136, company registration number is 26439395.

I.CA information addresses areas follows:

- Postal address of the company's site registered office:  
První certifikační autorita, a.s.  
Podvinný mlýn 2178/6  
190 00 Praha 9  
Česká republika
- I.CA's data box;
- Phone numbers +420 284 081 940 or +420 284 081 965;
- Electronic mail address info@ica.cz;
- In person at registered office of the registration authority in company's site (working hours on Monday to Thursday from 8.00 to 15.30, on Friday from 8.00 to 12.00).

Your question, suggestion or complaint can also be addressed to the Office for personal data protection, Pplk. Sochora 27, 170 00 Praha 7 – Holešovice, phone +420 234 665 111, electronic mail posta@uouu.cz.

## 1.2 Types of processed personal data

For the trust services needs the following personal data are processed:

- Name, surname, degree;
- Identification number;
- Initials;
- MPSV identifier;
- Gender;
- Permanent residence (street name, land registry number, house number, town or city, ZIP or postal code);
- E-mail address;
- Primary personal identity, or secondary personal identity (type and its number),

- Video recording or face photo (biometric data in case of remote certificate issuing),
- Photo of submitted identity documents when using the service for identity verification of natural persons (in case of remote certificate issuing).

Personal data (mandatory or obligatory) stated in certificate application depend on certificate type (see chapter 7 of relevant certification policy).

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### 1.3 Purpose and lawfulness of personal data processing

The purpose of client's personal data processing is to provide trust services and qualified trust services. Processed are identification and contact clients' data, other information for their identity verification and in case of remote certificate issuing also their biometric data.

Lawfulness of processing personal data of clients applying for PKI certificates is in case of qualified certificates and qualified trust services compliance with a legal obligation to which the controller (I.CA) is subject, in case of nonqualified certificates and other services is it the performance of a contract to which the client and I.CA are parties. In case of client biometric data processing client's explicit consent granting is legally required.

### 1.4 Failure to provide personal data

If personal data are not provided it is not possible to grant access to the trust services provided by I.CA, it means to issuing the certificate, issuing the time stamps or electronic signatures and seals verification.

### 1.5 Retention period of personal data

Identification and contact data as well as biometric data regarding trust services are in compliance with relevant legislation retained for ten years, the identity verification data for next fifteen years.

### 1.6 Making personal data available

Personal data contained in issued certificates are made available on the address <http://www.ica.cz/Verejne-certifikaty>. Issued certificates are published excepting those where the subscriber stipulates that certificate will not be published. This alternative is available for all certificate applicants and is described in certification policies (chapter 4.4.2).

Personal data of other services' clients (issuing qualified electronic time stamps and qualified service of verification of qualified electronic signature or seal) are not made available.

Personal data can be transferred for law or regulation purposes, but still in compliance with actual personal data protection legislation.

## 1.7 Recipients of personal data

Recipients of personal data are only subjects authorized according to relevant legislation, alternate trust services provider when I.CA's operation is terminated, or the supervisory body.

## 1.8 Transfer of personal data

I.CA does not transfer personal data neither to third countries nor to the international organizations.

## 1.9 Client's rights concerning personal data protection

The rights of the client as the data subject are:

- To gain access to his or her personal data processed by I.CA and to receive the copy of these personal data;
- To ask for rectification, if he or she finds out that data kept by I.CA are inaccurate, outdated or incomplete;
- To ask for erasure, but the right is limited by legislation regulating I.CA's processing activities and personal data need not to be erased fully or partially despite applying the right for erasure;
  - ↳ To receive personal data concerning him or her in commonly used and machine-readable format;
- To submit complaint to supervisory body (see chapter 1.1).

Note: The list is limited according to the set stated in legislation in view of the lawfulness processing condition (e.g., not relevant is processing necessary for the performance of a task carried out in the public interest or in the exercise of an official authority).